

**Advocates for the Oak Ridge Reservation
112 Newcrest Lane
Oak Ridge, TN**

April 13, 2000

William Richardson, Secretary
U.S. Department of Energy
1000 Independence Ave. SW
Washington, D. C. 20585

Dear Secretary Richardson:

I am writing to comment on a March 13th DOE press release announcing your directive to Deputy Secretary Glauthier to "lead a review of the real property needs" of DOE facilities, with the intent of making "long-term recommendations for tailoring real estate needs to mission requirements." I am writing on behalf of Advocates for the Oak Ridge Reservation (AFORR) to urge careful consideration of the many values of DOE's reservation lands during this review.

As you know, the reservation lands surrounding DOE's facilities serve many important ends that coincide with the goals spelled out in this year's draft of DOE's Strategic Plan. Among them are:

- Acting as a buffer area to provide security around our nuclear facilities.
- Serving as a buffer area to protect citizens from inadvertent contact with contaminated areas and hazardous operations.
- Providing extensive natural ecosystems for research on the environmental impacts of energy-related activities and pollutants, feedbacks between greenhouse gases and terrestrial systems, and the potential role of terrestrial ecosystems for carbon sequestration.
- Providing living laboratories for the education of students from pre-school through graduate school in the environmental sciences.

The values listed above coincide with three of the major broad thrusts of the current draft of DOE's Strategic Plan—(1) National Nuclear Security, (2) Environmental Quality, and (3) Science.

We are optimistic that DOE will fully consider the importance of buffer zones surrounding facilities and lands where there are classified activities, operations that use radionuclides and hazardous materials, or contamination from past activities. The presence of buffers deserves much of the credit for the fact that the "civilian population" of Oak Ridge has coexisted comfortably with nearby DOE facilities for over half a century. Allowing residential developments and office parks near hazardous sites without security zones would invite trouble.

In evaluating these lands, we think it is vitally important that their science values also be fully considered. Immediately adjacent to most of DOE's national laboratories are key field research sites, currently being used—and with the potential for greater future use—to explore key scientific questions relating to energy use. Among these critical energy topics are global climate change, the effects of air pollutants on our environment, and means of carbon sequestration to counter rising atmospheric carbon dioxide levels. Many research projects on these reservation lands have involved, and continue to involve, significant collaboration with other government agencies (NASA, EPA, TVA, USDA Forest Service, NSF, etc.), and state and private universities, to perform some of the highest quality research in the country on energy-related impacts on the environment. Much of this research would not be possible without the combination of large-scale field research facilities and the variety of natural ecosystems available on DOE Reservation lands, especially its National Environmental Research Park. It would be regrettable to lose unique research opportunities by transferring land holdings that might later be of critical value for energy-related research.

In addition to these land values that coincide directly with DOE's primary strategic goals, we urge you and the agency to consider the unparalleled conservation values of these lands for future generations. We live in an era when our country's open spaces are succumbing to urban and suburban sprawl, our migratory bird species are in a steady decline, and non-native invasive plant species are overrunning our native wildflower and other plant species. We are convinced that the majority of Americans recognize the value of conserving our remaining unique natural resources and open green spaces. As you yourself, Secretary Richardson, so eloquently stated last year when you dedicated the Three Bend Scenic and Wildlife Management Refuge Area, "In places where environmentally unique resources are involved, we have a special responsibility to the states and communities, like yourselves, that have supported us and the future generations, to safeguard those precious places."

The DOE Oak Ridge Reservation is truly such a precious place. Because of the unique history of protection from human development, the 34,500 acres in DOE's Oak Ridge holdings are in fact a huge island of relatively intact forest surrounded by urban, suburban, and agricultural development. Consider a few special characteristics of DOE's Oak Ridge Reservation:

- In 1995, The Nature Conservancy identified over 270 occurrences of significant species and communities on the reservation.
- These unique places have led to the establishment of seven registered State Natural Areas on the ORR.
- Five years of breeding bird surveys by the national Partners in Flight (PIF) program have found that the ORR is a breeding ground for 18 of the 20 species identified by PIF as priorities for conservation in the Ridge and Valley Province. Half of these bird species are rarely found in the surrounding region, but are relatively common on the ORR.
- These surveys have documented more species of breeding birds (over 200) on the reservation than any other location in the eastern part of the state (including the Great Smoky Mountains National Park).
- The Oak Ridge National Environmental Research Park is currently designated as an International Biosphere Reserve, serving along with the Great Smokies as part of a network of biological data and research opportunities.

- At least 21 state-listed rare plants and 20 state-listed and two federally-listed wildlife species are found on the reservation.
- The reservation currently is a popular location for fall and spring hunting for Wild Turkey and White-tailed Deer. Quail Unlimited is partnering with Tennessee Wildlife Resources Agency for enhancement of habitat for Northern Bobwhite and other upland wildlife on the reservation.

It has been well documented in the scientific literature that reductions in size, and increases in fragmentation, of natural ecosystems lead to a loss of biodiversity. Many of these plant and animal species are present here because they are sensitive to human disturbance and need interior forest habitats. Especially in the East, tracts of undisturbed land are getting smaller and fewer. The ORR is of utmost importance as the largest remaining, relatively unfragmented natural area in the Ridge and Valley Province.

Many other federal agencies have joined in national conservation efforts, and we urge the Department of Energy to step forward and assert itself more aggressively in this movement. Partners in Flight, for example, boasts active participation from virtually all agencies in the federal government with significant land holdings. This includes the Department of Defense, the National Park Service, the U. S. Forest Service, the Natural Resource and Conservation Service, the Bureau of Land Management, the Bureau of Land Reclamation, U. S. Fish and Wildlife Service, the Environmental Protection Agency, and numerous state agencies and private organizations.

In recent years a sizeable fraction of the Oak Ridge Reservation has been transferred or otherwise made available for local economic development. Of the remaining 34,500 acres on the Reservation, only approximately 20,000 now remain in the Oak Ridge National Environmental Research Park. Numerous tracts have been made available for development—approximately 5,000 acres in the last 15 years—as the reservation continues to shrink in size. The larger tracts that have been made available include:

- 1100-acre former site for the Clinch River Breeder Reactor, now owned by the Tennessee Valley Authority and being made available as a potential industrial development site.
- Two tracts totaling 380 acres sold for development of the City of Oak Ridge's Bethel Valley Industrial Park and Lockheed Martin's Commerce Park industrial park.
- 1220 acres sold to the Boeing Corporation in 1988 for a missile project (never used for that purpose, and currently proposed for development for a golf course and mixed residential-commercial-industrial use);
- 756-acre "Parcel A," sold to the City of Oak Ridge in the early 1990s, now developed as a golf course and residential subdivisions, but with few homes sold.
- 960 acres leased to the Community Reuse Organization of East Tennessee (CROET) in 1997 for development as an industrial park.
- And just recently, the proposed leasing of 450-acre "Parcel ED-3" to CROET for commercial and industrial development.

Each one of these land transfers was proposed as a stand-alone action to foster economic development, but together they form a program to carve up the public lands of the Oak Ridge Reservation for private benefit. Will urban/suburban sprawl consume another unique biological resource in the name of economic development?

We urge you to put an end to the piecemeal dismantling of a unique and irreplaceable national asset. We need your leadership to protect the remaining reservation lands from shortsighted developments that lack a compelling national benefit. Please protect the integrity of the Oak Ridge Reservation for its multiple special values: (1) for scientific research and education, (2) as buffer zones for national security and protecting the population from contamination, (3) for recreation and aesthetic values, (4) for unique conservation values, and not least, (5) for unanticipated national needs of future generations.

Sincerely,

J. Devereux Joslin, Jr.
President
Advocates for the Oak Ridge Reservation

CC: President Clinton
Vice-President Gore
DOE Oak Ridge Operations Manager Dever
DOE Under Secretary Moniz
DOE Deputy Secretary Glauthier
Congressional delegation of the State of Tennessee

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