

February 25, 1999

Mr. William Richardson
Secretary of Energy
United States Department of Energy
1000 Independence Ave., SW
Washington, DC 20508

Dear Mr. Richardson:

Advocates for the Oak Ridge Reservation (AFORR) is a local organization representing most of the key environmental organizations in the state of Tennessee. Recently word has reached us that you are considering the possibility of creating wildlife protection and regulated hunting areas on portions of the DOE Reservations that have the existing potential for supporting such activities. We would be fully in support of any action that would ensure long-term protection of these lands and would retain for their unique conservation and scientific values and applaud your forethought in considering such a designation.

However, there is a larger environmental issue than wildlife habitat involved in protection of these lands. The DOE Reservations played a critical role in the development of the environmental and ecological sciences. Four decades ago the Atomic Energy Commission (AEC) established the first large-scale ecology and ecosystem programs that were concerned with the impacts of radioactivity on the environment and its ecosystems. These programs drew on the advanced science and technology capability of the laboratories on those sites. At that time these first sites were Hanford, Oak Ridge, and the Savannah River Plant. Soon research programs were established at Argonne, Brookhaven, Idaho, Los Alamos, Nevada Test Site, and Puerto Rico. By the late 1960's a number of these sites were included in the first national major ecology program that incorporated the first use and development of mathematical models and large-scale field experiments. This program was directed by the National Science Foundation (NSF), and for the first time NSF research funds were used to support this research at AEC facilities.

In the early 1970's in recognition of the importance of these reservations to the Agency mission activities, the AEC designated seven of these Reservations as National Environmental Research Parks to provide protected land areas for long-term studies of the potential impacts of energy technologies on the environment. In

addition, these DOE Research Parks would be used to demonstrate the compatibility of energy technology with a quality environment as well as provide areas for research and education in the environmental sciences.

These DOE Research Parks, located in South Carolina, Nevada, Tennessee, Idaho, Illinois, New Mexico, and Washington state, represent seven different ecological regions in the United States. In addition they reflect a broad range of human impacts, with sites ranging from the pristine to the highly contaminated. Thus, a comprehensive understanding of energy impacts on the environment is achievable today by the use of these sites for research, particularly on such questions as global change and the impact of increasing carbon dioxide levels on the biosphere.

Furthermore, the DOE Research Parks provide unique educational opportunities. The Oak Ridge National Environmental Research Park has been highly successful as a training ground for future researchers, including students in all grades and levels, ranging from kindergarten to graduate school as well as university faculty. In the past five years this Research Park has been used by 85,000 elementary and high school students from Tennessee as well as pre-college teachers, and university faculty for educational activities in the environmental sciences and research.

A tremendous amount of biological diversity and preservation of special habitats are an unanticipated result of the Oak Ridge Reservation land area that has served as buffer for the DOE facilities. Many species and special habitats occur on the reservation that are now absent or uncommon in the surrounding area. The vascular plant list includes over 1100 species, with 26 of them listed as rare on the Tennessee list. Wildlife, likewise, is abundant and varied. Over 20 state and/or federally listed species occur, and habitat for at least 20 additional listed species exists (although not yet surveyed). Additionally, there have been more species of breeding birds documented on the Oak Ridge Reservation than on any other single tract of land in Tennessee.

The Nature Conservancy, in a preliminary biodiversity report on the Oak Ridge Reservation, as part of the DOE Future Use initiative in 1995, identified over 270 occurrences of significant species on the reservation. Using federal and state ranking systems, conservation sites were identified based on clusters of rare species and significant communities with 27 ranking as very high in significance and 54 as

high. The Nature Conservancy recommended that three large blocks of land be protected as landscape complexes to preserve the integrity of the cluster of significant areas identified.

However, the integrity of these DOE Research Parks are now in jeopardy as there is pressure for industrial or residential development of these lands. Yet the unique scientific and conservation values of these lands are unparalleled on any other public or private lands in the United States. We find it ironic that the Administration is suggesting ways to acquire more public lands and to reduce sprawl, yet the DOE is considering releasing some of the country's most valued lands for scientific research and conservation.

In closing, Mr. Secretary, we would urge you to consider some means to retain the long-term integrity of the DOE National Environmental Research Parks. They have demonstrated value to the Department and country as unique entities relating the impacts on the environment of present as well as future energy-related technologies. In addition, they can provide the land resources for locating new energy-related facilities.

Sincerely,

J. D. Joslin, Chair
Advocates for the Oak Ridge Reservation