

Advocates for the Oak Ridge Reservation reviewed two DOE EAs for proposed actions on the Oak Ridge Reservation in 2020 and submitted comments on both documents. In the course of our reviews, we have identified two issues that are larger than either of these EAs:

1. The need for a site-wide environmental impact statement covering DOE programs, activities, and plans across the Oak Ridge Reservation
2. The importance of retaining coordinated management of undeveloped lands and natural landscapes on the Reservation under one DOE organization.

As federal property, the Oak Ridge Reservation is an asset that belongs to the people of the United States, not to the U.S. Department of Energy (DOE). DOE is the agency entrusted with its management. While DOE's primary purpose is to conduct activities in support of certain high-priority national needs on parts of the Reservation, we believe that DOE has a larger obligation to ensure that this asset is responsibly managed in support of the broad public interest, now and in the future. For over two decades, Advocates for the Oak Ridge Reservation (AFORR) has contended that to properly discharge its management obligations for the Oak Ridge Reservation, DOE should prepare a site-wide environmental impact statement (EIS) for the entire DOE Oak Ridge Reservation, as provided for in DOE National Environmental Policy Act (NEPA) regulations at 10 CFR 1021.330, to include comprehensive consideration of land use. The regulation states: "As a matter of policy when not otherwise required, DOE shall prepare site-wide EISs for certain large, multiple-facility DOE sites." This requirement has been in place for many years, and there is no question that the Oak Ridge Reservation is a large, multiple-facility DOE site, but there has never been a site-wide EIS to comprehensively examine the impacts of DOE programs and management activities across the Reservation. Every other major DOE site, and even some much smaller sites, has conducted at least one site-wide EIS, and most have reevaluated these documents regularly and conducted new site-wide EISs when situations have changed. For example, we note that on August 5 the National Nuclear Security Agency (NNSA) issued a Notice of Intent for a new site-wide EIS for the Lawrence Livermore National Laboratory (<https://www.energy.gov/sites/prod/files/2020/08/f77/noi-eis-0547-llnl-site-wide-2020.pdf>), to replace or update previous site-wide EISs published in 1992 and 2005. In the absence of a site-wide EIS for the Oak Ridge site, there has been a history of piecemeal land transfers that have been dismantling the Oak Ridge Reservation piece by piece, with a NEPA environmental assessment (EA) and finding of no significant impact (FONSI) for each transfer, thus segmenting a larger action that should be considered a major federal action to be examined by an environmental impact statement.

The fact that we received two different DOE draft EAs on the same day for two different proposed actions (the ORETTTC EA and the EA Addendum for Proposed Revitalization of Parcel ED-1 at the Horizon Center) at locations that are across the highway from each other, yet neither EA acknowledges the existence of the other proposed action, only highlights the magnitude of DOE's failure to treat the Reservation as a coherent whole that deserves coordinated management. A site-wide EIS is required.

The Oak Ridge Technology and Training Center (ORETTTC) EA states that management responsibility for 950 acres (larger than the 811-acre area of the Y-12 plant) was transferred to NNSA from the Office of Science Consolidated Service Center to allow NNSA to site a project that requires only 81 acres. AFORR is concerned that, by transferring management responsibility for far more land than NNSA requires for its project, DOE is needlessly fragmenting management responsibility for natural landscapes on the ORR. It is noteworthy that this 950-acre area includes some resources of special significance, including Hembree Marsh and a tract of old-growth forest. Management of these areas should be integrated with management of other Oak Ridge Reservation natural landscapes and should be overseen by personnel with expertise in natural areas stewardship. Natural areas stewardship has not historically been a mission of NNSA, nor an

area of NNSA expertise, but it is something that the Office of Science has done well for many years with support from Oak Ridge National Laboratory. Accordingly, we ask that responsibility for lands not needed for the NNSA project discussed in the EA be returned to the Office of Science Consolidated Service Center. Furthermore, we ask that DOE affirm as a policy that management of undeveloped Reservation lands not in active use for operating facilities or cleanup will not be divided across different DOE organizations.