

Mr. David Wilfert
Spallation Neutron Source Program
U.S. Department of Energy
Oak Ridge Operations Office
nsnseis@ornl.gov

Dear Mr. Wilfert:

Advocates for the Oak Ridge Reservation support the NSNS project as an important scientific endeavor, as an opportunity for Oak Ridge National Laboratory to maintain its world-class ranking in this field of research, and as a significant economic activity that will benefit Oak Ridge and the surrounding communities for many years into the future.

We acknowledge that siting of the NSNS within the Oak Ridge Reservation (ORR) is consistent with the purpose and mission of the ORR.

We are concerned that the preferred location for the NSNS on Chestnut Ridge -- at the center of the National Environmental Research Park and the Southern Appalachian Biosphere Reserve -- together with the planned location of the Joint Institute for Neutron Science will significantly contribute to the increasing forest fragmentation in this nationally and internationally important habitat for rare and endangered species.

We also are concerned about likely and possible impacts of the NSNS on long-term research projects that have been collecting scientific data on the forest and stream ecosystems in the Walker Branch Watershed for three decades.

The draft EIS fails to adequately address cumulative impacts on the ORR and in particular on its biodiversity. It does not even include in its assessment such major impacts from the immediate past and from present activities as the development of the ED1 parcel. Indeed, the document's discussion of cumulative impacts is essentially limited to the construction and operational phases of the NSNS project, and its anticipated future expansion. Thus this EIS does not meet the requirements detailed in 40 CFR 1508.7 of assessing cumulative impacts, which requires the inclusion of "other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time."

Also, the draft EIS does not assess in sufficient detail mitigation measures that might be taken to minimize the environmental impacts of the NSNS, such as DOE long-term commitments to preserving the integrity of the National Environmental Research Park and alternative technologies for cooling the NSNS.

We respectfully request that you

- address these omissions in the final EIS
- involve local stakeholders in the design and analysis of mitigation measures
- hold another public comment period and hearings on the FEIS before decisions on the final design of the NSNS are made and any construction begins.

Sincerely,