

Recommendation 1.1:

I applaud this recommendation. The DOE under Secretary O’Leary mandated EISs of the National Laboratories – ongoing activities. This was a gigantic waste of effort and time and resources, and the environmental assessments were poorly done anyway.

Recommendation 1.2:

This one can create problems, since many of the lawsuits brought try to make the case that the EIS is “incomplete.” This recommendation could open the door to more of such lawsuits and the process could drag on even further than it does now.

Recommendations 1.3 and 1.4:

These are both excellent, although “environmental concerns” will need to be defined.

Recommendation 2.1

I do not believe this will have the desired effect. Most activist groups have local chapters or affiliates, or just members with local addresses that they can call on. For example, as a member of the Trinity Section of the American Nuclear Society, I can, and have, represented the Society’s position on local issues. I would delete this recommendation.

Recommendation 2.2:

This can create the same problem as Recommendation 1.2.

Recommendation 3.1:

I don’t really see the need for this one – the activists get their voices heard anyway and seem to dominate the NEPA process now.

Recommendation 3.2:

An excellent recommendation.

Recommendation 4.1:

We are overdue for this one! A excellent recommendation.

Recommendation 5.1:

A good recommendation.

Recommendation 5.2:

Good except for the mandatory rejection requirement. Assessment of environmental impact always has a considerable subjective component, and I can see where that could result in protracted litigation.

Recommendation 5.3:

I am personally neutral on this one.

Recommendation 6.1:

I don't think this is necessary. There appears to be more than ample consultation with stakeholders now. Having attended many NEPA hearings, I can say from personal experience that activists will take up time and effort to raise issues not remotely pertinent to NEPA and will take hours and hours doing it.

Recommendation 6.2:

Probably a good one.

Groups 7, 8 and 9 Recommendations:

These are also excellent and long overdue.