

SAVE STRAWBERRY CANYON

P.O. BOX 1234

BERKELEY, CALIFORNIA 94701

Save Strawberry Canyon is a citizens' group that seeks to preserve and protect the watershed lands and cultural landscape of Strawberry Canyon. Save Strawberry Canyon was formed out of the urgent need to take action in response to the threat of intrusive, inappropriate development on the Canyon lands.

Strawberry Canyon, opposite the Golden Gate, is a unique link to the East Bay Regional Park district lands and, by its streams and views, to the San Francisco Bay. The Canyon itself with its streamside vegetation, oak-bay woodlands, grasslands, and surrounding slopes, is a rich repository of wildlife directly adjacent to the dense urban populations of the UC Berkeley Campus and the cities of Berkeley and Oakland.

Save Strawberry Canyon seeks to inform the public about the impacts of proposed developments, to encourage location of such developments to more suitable sites, and to promote better public access to the beautiful Canyon with its wildlife and scenic resources.

July 14, 2009

Via electronic mail kim.abbott@bso.science.doe.gov

Kim Abbott
Department of Energy Office of Science
Berkeley Site Office
Lawrence Berkeley National Laboratory
One Cyclotron Road, MS 90-1023
Berkeley, CA 94720

Re: Comment on the BELLA draft EA

Dear Kim Abbott,

Thank you for the opportunity to comment on the Environmental Assessment (EA) prepared for the BELLA project, the new accelerator proposed for the Lawrence Berkeley National Laboratory hill site. These comments are submitted on behalf of Save Strawberry Canyon, a non-profit organization dedicated to the preservation and protection of Strawberry Canyon and the headwaters of Strawberry Creek.

The proposed project is an "experimental facility" (EA, p.3). Save Strawberry Canyon takes note that this small one meter laser would generate 10 billion electron volts.

The experimental nature of the project is perhaps the singularly most important project characteristic from an environmental standpoint. Please clarify the basis for estimates of radioactive emissions. Please provide evidence of the documents and reports which are

the basis for estimated radioactive emissions. Furthermore, please provide empirical evidence which shows that the three feet thick concrete wall at the west end and the “16 inches of lead, 36 inches of steel, and another 6 feet of concrete...outside the Experimental Cave” (EA, p.27) suffice to absorb the radiation to the level estimated.

The EA uses these estimates as the basis for assumptions about health impacts to the people living in the vicinity and to visiting children, who are sensitive receptors, at the nearby science museum. As stated in the EA, the proposed project is as close as 448 feet from Campus Drive, a residential neighborhood, and 516 feet from the Lawrence Hall of Science. Was a health risk assessment prepared for the project? Any number of impacts might be underestimated due to faulty estimates of radioactive emissions.

The proposed project would be located in Blackberry Canyon, which is drained by the North Fork of Strawberry Creek. The EA neglects to mention this relationship. Please clarify the potential impacts to hydrology, water quality, and soil. The relationships are particularly important in light of historic groundwater contamination as evidenced by a radioactive plume described in the EA. Given that the proposed project is an experimental methodology with estimated predictions about radioactive emissions, please clarify the federal obligations under the Clean Water Act.

The proposed project has cumulative impacts which would degrade Strawberry Canyon. As stated in the EA, the proposed project is one of several construction projects in the vicinity. LBNL maintains that these projects are synergistically related (see LBNL Long Range Development Plan EIR), and as such, relocating any one of these projects may affect the viability of the others and may reduce the cumulative impacts of the whole. Hence, please explain why it is necessary to locate the proposed project at the LBNL hill site. Please clarify the relationship between the BELLA project and any and all projects which are synergistically related.

The projects listed in the EA as having potential for cumulative impacts include Seismic Phase 1, Seismic Phase 2, the User Support Building, Building 51 and the Bevatron Demolition, Building 77 Rehabilitation, Building 6 Seismic Upgrade, the Southeast Campus Integrated Projects, the Northeast Quadrant Science and Safety Projects, the Computational Research and Theory Building, the Helios Energy Research Facility, the Guest House. The EA neglects to mention that the Helios Energy Research Facility Final Environmental Impact Report (EIR) was **decertified** by the Regents. Please refer to the Notice of Preparation of an EIR for the Helios project dated 12/1/08 and issued by the University of California where it states that “...(t)he Regents has decertified the Final Environmental Impact Report and rescinded the design approval of the Helios Energy Research Facility as previously proposed. This Notice of Preparation has been issued to inform the agencies and the general public that a new EIR will be prepared for the redesigned Helios Energy Research Facility Project.” At present, no EIR has been issued for the redesigned Helios facility.

In closing, the proposed project perpetuates a legacy of inappropriate experimental research at this hillside location. Whatever higher purpose the research would accomplish is not the point. The societal cost of squandered natural resources and the cavalier dismissal of threats to human health from proximate radiation sources are of grave concern.

Thank you for considering our comments and concerns.

Yours sincerely,

Janice Thomas
Secretary,
Save Strawberry Canyon

cc: Edgar Bailey, Chief, Radiological Health Branch, CA Dept of Health Services
Susan Moore, Chief Supervisor, US Fish and Wildlife Service, Sacramento Office