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Transmitted by Email to: [Complex2030@mnsa.doe.gov](mailto:Complex2030@mnsa.doe.gov)

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**RE: Complex 2030 ("Bombplex"), the Dept. of Energy Plan to Revamp the US Nuclear Weapons Complex**

Complex 2030 proposes to build a new plutonium pit manufacturing center while revitalizing US nuclear weapons development and production capabilities at 8 sites around the country. The driving force behind this scheme is the Reliable Replacement Warhead (RRW) program. Under RRW, American weaponeers want to re-design and rebuild essentially every nuclear weapon in the enduring arsenal. According to Department of Energy (DOE) documents that underpin the Complex 2030 plan, the agency envisions a new RRW bomb design coming out of its weapons labs at Livermore and Los Alamos every five years, and plans to build these newly-designed nukes at the rate of 125 per year.

Tri-Valley CAREs is a non-profit organization located in Livermore, California. Tri-Valley CAREs has been monitoring the activities of Lawrence Livermore National Laboratory (LLNL) and the nuclear weapons complex for more than twenty years. On behalf of our 5,000 members, we submit the following scoping comments on the DOE National Nuclear Security Administration (NNSA)'s Complex 2030 Supplemental Programmatic Environmental Impact Statement (PEIS).

**PURPOSE AND NEED**

The JASONs review of the DOE weapons labs' plutonium "aging" data must be included in the draft PEIS and reflected in its "Purpose and Need" section. The JASONs report of November 20, 2006 on plutonium pit lifetimes essentially states that the plutonium pits in U.S. nuclear weapons will remain reliable for approximately 100 years at a minimum (and perhaps much longer as a maximum). The average age of a U.S. nuclear weapon in the enduring arsenal is less than 22 years. These data undercut any possible justification, based on plutonium aging or reliability, for building a new arsenal of RRWs and / or transforming the complex so that it can produce new plutonium pits for new nukes.

Please carefully analyze the significance of the plutonium aging data to the future of the nuclear weapons stockpile and the DOE's perceived "need" to develop and produce new nuclear weapons. In this context, the "Purpose and Need" for the RRW program and for a new plutonium pit production center must be fully analyzed.

Moreover, the connections between the RRW program, the proposed new pit production facility and the Complex 2030 plan as a whole must be detailed. At the Livermore public scoping meeting, One DOE official was heard to say that there is not a connection between these three elements. He stated that Complex 2030 and the proposed plutonium pit production plant could go forward with or without the RRW program.

Given that the pit production facility envisioned as part of Complex 2030 is sized to produce at least 125 certified (war reserve) plutonium pits per year, and given that the RRW program plan calls for 125 new nuclear weapons per year, it is a little difficult not to make a connection between the two. However, if DOE does not agree that the mission, or "purpose," of the Complex 2030 plutonium pit production facility is to make pits for the new RRWs, then DOE should explain in detail for what purpose the 125 certified pits will be "needed."

Additionally, the Complex 2030 plan is being sold to Congress and the public as a consolidation plan. Although Complex 2030 documents discuss consolidation, as presently configured, it fails to accomplish this goal. The 2030 plan that was circulated at the scoping hearings was to go **from 8 sites to 8 sites**. This is revitalization, not consolidation. Please eliminate from further consideration any option that does not involve real consolidation.

## **TRITIUM RESEARCH AND DEVELOPMENT**

Tritium is a radioactive form of hydrogen that is hard to contain and that once released can travel with the wind, rain out easily and become organically bound in the food chain. Additional activity with tritium at DOE sites will lead to tritium releases into the environment, threatening worker and public health.

At Livermore Lab tritium has been released to the air, soil and groundwater. Known tritium releases to the air from Livermore Lab total between 800,000 and one million curies. At the Livermore Lab main site, tritium has been measured in rainwater at a concentration of 147,000 picocuries per liter, more than 7 times the state and federal maximum contaminant limit (MCL) for water. The groundwater has been found to contain tritium above the MCL at both the Livermore Lab main site and its Site 300 high explosives testing range. At Site 300, the concentration of tritium in the groundwater has been measured at 2 million picocuries per liter, 100 times the MCL.

Livermore valley wines taken off the shelf and analyzed by Livermore Lab have been found to have nearly four times the tritium of other California wines. Local honey and other agricultural products have also been found to contain elevated levels of tritium. The milk of local cows has also been found to contain excess tritium.

Historically, and up to the present, the concentration of tritium in local agricultural products closely mirrors the amount of tritium activity that goes on at Livermore Lab. Years where tritium programs have increased -- so, too, the environmental burden of tritium increases. And, when tritium activity goes down at Livermore Lab, tritium concentrations in wine, honey and mild decreases.

Seven million people live within a 50-mile radius of Livermore Lab. The Livermore Lab main site has earthquake faults within 200 feet of the site boundary. Site 300 has earthquake faults running through it. One option in the Complex 2030 plan has tritium activities increasing at Livermore Lab. This is, succinctly put, insane. This option should be dropped from further consideration and should not appear in the draft PEIS at all. Tri-Valley CAREs advocates for a phase out of all tritium activity at Livermore Lab. This is a viable option that should be analyzed in the draft PEIS.

Please describe in the draft PEIS the pathways through which this material can get into the environment and impact human health and the rest of the ecosystem, including plants and animals. Also, provide detailed alternatives to increased tritium R&D at any location in the DOE complex.

### **CONSOLIDATION OF CATEGORY 1 AND 2 SPECIAL NUCLEAR MATERIALS**

The plutonium and highly enriched uranium at Livermore Lab are vulnerable to a terrorist attack, a disgruntled employee scenario and to release in the event of a major earthquake. Congress had directed that weapons usable quantities of plutonium and highly enriched uranium be removed from Livermore Lab. The Complex 2030 plan should proceed with the expectation that these materials shall be moved a long, long time before 2030. Yet, the Complex 2030 plan appears to involve moving the plutonium from Livermore twice -- once to Los Alamos Lab for use in bomb experiments there and then a second time to the new plutonium pit production facility at an as yet unnamed location.

Tri-Valley CAREs requests that a far different option be analyzed. First, there is no need for a new pit production plant anywhere. Second, the plutonium from Livermore lab should be moved only once -- and for safe and secure storage, not new bomb experiments. We suggest the following process:

First, undertake a study of potential storage sites. This study should not be limited to sites that are part of Complex 2030. For, if the plutonium from Livermore Lab were to be simply stored safely at a remote location, that plutonium would not have a role in Complex 2030.

This is an important point because with the present Complex 2030 plan, the tail of new nukes is wagging the dog of Livermore's plutonium. An unbiased analysis might show that the safest and most secure location for Livermore's plutonium is at a site that is not one of the eight involved in Complex 2030. Or, perhaps one of the eight is the best site (though it most certainly won't be Los Alamos -- the place Complex 2030 now proposes to send it). Point is, start with the analysis.

Second, make the study of potential storage sites as transparent as possible. Bring in independent analysts, community members, affected tribes and other stakeholders.

Third, (and this can begin today) lay out a plan to safely package the plutonium at Livermore Lab. The Defense Nuclear Safety Board has cited Livermore Lab's plutonium facility for storing plutonium in paint cans and food tins. And, this is only the tip of the iceberg. Good procedures,

and a reasonable allocation of time and money will be required to package the plutonium for shipment.

Fourth, ship it to the selected location in as safe and timely manner as is possible. Allocate sufficient funds to ensure that it is stored safely and securely at the new site. Continue to involve independent analysts, communities, affected tribes and other stakeholders.

The Complex 2030 documents have not discussed Livermore Lab's highly enriched uranium. Similarly, it should be removed long before Complex 2030 kicks in. And, the material should be stored as safely as possible at the most secure location. The DOE should undertake a process similar to the one outlined above to determine the best location. And, the highly enriched uranium should be stored only, and not be used in bombs or in nuclear weapons experiments.

## **HYDRODYNAMIC TESTING**

Site 300, Livermore Lab's high explosive testing range, sits on the edge of the Bay Area – with, as noted above, a population of seven million people nearby. Although the DOE announced in early 2006 that explosive testing would most likely be phased out for Site 300, the Department dramatically changed course and recently Livermore Lab applied for a permit to ramp up the allowable limit for explosive power per shot and per year at Site 300. This means a increase from 1,000 pounds to 8,000 pounds annually of TNT equivalent explosions.

These increases will be accompanied by more air pollution for the surrounding area and airborne radiation from the depleted uranium routinely used in test shots. Moreover, the Record of Decision on the Livermore Lab Site Wide EIS permits a resumption of the use of tritium in outdoor explosive shots on the firing tables.

At Site 300, the Tracy Hills Development, with hundreds of residences, is planned about a mile from the site boundary. At the southern boundary there are ranches. Across Corral Hollow Road from the fence line, there is a well-used state recreation facility. Due to the increased number and yield of test bomb shots, known chemical and heavy metal releases and potential new tritium releases, the DOE should address the issue of encroachment.

Site 300 is also home to a myriad of federally listed endangered and threatened species. The current incidental take allowance from USFWS is 25 red-legged frogs and 5 Alameda whipsnakes. The effects to these species of continuing to do explosive testing at Site 300 should be studied.

Site 300 is a Superfund Site, on the federal EPA's list of most contaminated sites in the country, and as such it should be cleaned up rather than further contaminated. One option in the Complex 2030 plan would increase high-explosives activities and hydrodynamic testing at Site 300. This, too, is crazy. We submit that, instead, hydrodynamic testing at Site 300 should be closed out altogether.

Moreover, the Complex 2030 draft PEIS should consider ramping down hydrodynamic testing at other sites, and not ramping up at any site.

The draft PEIS should contain an analysis showing the number of DOE-sponsored hydrodynamic shots each year at each site that are devoted in whole or in part to weapons development and the number of shots annually at each site that are strictly and solely for maintenance of the existing arsenal as it awaits dismantlement.

Based on these data, the draft PEIS should contain an alternative that would (1) terminate all bomb development-related tests (as they do not need to be conducted), and (2) analyze the most safe and secure location at which to conduct the few tests deemed necessary for maintenance.

## **NATIONAL IGNITION FACILITY**

The Complex 2030 materials circulated to date are not clear on the role, if any, of the National Ignition Facility mega-laser in Complex 2030. The draft PEIS should clarify this question.

## **NONPROLIFERATION ANALYSIS - COMMITMENTS AND OBLIGATIONS UNDER U.S. AND INTERNATIONAL LAW**

It is unacceptable to brush aside a discussion of how DOE/ NNSA will ensure compliance with the nuclear Non-Proliferation Treaty (NPT), which is US law, in the analysis of the draft PEIS, especially with the new planned pit manufacturing capability, the Reliable Replacement Warhead and the “responsive infrastructure.”

The New Agenda Coalition, an influential group of signatory states to the NPT, have called upon the nuclear weapons states to stop modernizing their arsenals:

*“Any plans or intentions to develop new types of nuclear weapons or rationalization for their use stand in marked contradiction to the NPT, and undermine the international community’s efforts towards improving the security of all states.”*

On June 1, 2006, Hans Blix issued a recommendation for freeing the world of Weapons of Mass Destruction. In that document, the United States was described as “exploring the possibilities of developing new types of nuclear weapons.” In response, the report recommended:

*"Any state contemplating replacement or modernization of its nuclear-weapon systems must consider such action in the light of all relevant treaty obligations and its duty to contribute to the nuclear disarmament process. As a minimum, it must refrain from developing nuclear weapons with new military capabilities or for new missions. It must not adopt systems or doctrines that blur the distinction between nuclear and conventional weapons or lower the nuclear threshold."*

Kofi Annan, on Nov. 28, 2006 at Princeton University made this statement about nuclear weapons:

*"All of the NPT [Non-Proliferation Treaty] nuclear-weapon States are modernizing their nuclear arsenals or their delivery systems. They should not imagine that this will be*

*accepted as compatible with the NPT. Everyone will see it for what it is: a euphemism for nuclear re-armament."*

The world is at a crossroads. The US is setting the course for the future of nuclear weapons on earth. Complex 2030 is the expression of how the US DOE envisions this future. Tri-Valley CAREs brings a voice of reason to challenge this "nukes forever" plan. We call upon the DOE to refocus the Complex 2030 plan on new and innovative ways to better comply with the US obligation to achieve nuclear disarmament, as expressed in the NPT and upheld by the International Court of Justice.

A Complex 2030 plan that will help us establish a nuclear weapons free world for future generations is the plan worth pursuing.

The draft PEIS should consider both the vertical and the horizontal nuclear proliferation risks of each Complex 2030 alternative, including that some of the options currently being considered may lead to the increased threat of other countries getting and using a nuclear bomb as a result of our country resuming nuclear weapons production. By nuclear weapons production, we mean both the RRW program's contemplated weapons production and the plutonium pit factory (as a nuclear core that contains sufficient material to detonate is a bomb).

### **NEED FOR ANALYSIS OF THE ENVIRONMENTAL AND HEALTH IMPACTS OF A TERRORIST ATTACK -- AND THE POTENTIAL IMPACT OF COMPLEX 2030 ON TERRORISM**

According to the President in Homeland Security Presidential Directive-3, the world has changed since September 11, 2001. "We remain a Nation at risk to terrorist attacks and will remain at risk for the foreseeable future. At all Homeland Security Threat Conditions, we must remain vigilant, prepared, and ready to deter terrorist attacks." Thus, the DOE should treat terrorist attacks as a threat that is reasonably foreseeable for the purposes of NEPA and the environmental impacts of which should be fully analyzed just as reasonably foreseeable accidents scenarios are analyzed in NEPA documents. This was affirmed in the San Luis Obispo Mothers for Peace v. NRC case.

We have grave concern that plans to revamp the nuclear arsenal – at whatever location ultimately chosen – will also create attractive targets for terrorism and other acts of malice or insanity. Additionally – each time that these materials are shipped – there will be more opportunities or attack.

For example, in Livermore densely-populated neighborhoods with tract homes are built right up to the fence line of the Livermore Lab. Houses sit a mere 800 yards away from the tritium and plutonium facilities that make up the so-called "superblock". Releases of radioactive materials could have a profound and enduring impact on the 7 million people surrounding the Livermore Lab.

In the draft PEIS, it is critical that a security assessment be done that the public can provide input on – and that takes into account the various ways that these materials will be made vulnerable including storage, transportation, loading / unloading, packaging, processing etc. A generalized

discussion of the pros and cons of each proposed location for these materials should be included. Further, we assert that the nuclear materials should not be shipped gratuitously, and surplus materials should be immobilized in forms that are difficult to access and retrieve for would-be attackers. Moreover, we would expect that the amount declared "surplus" to the nuclear weapons program would steadily increase over time as disarmament advances. This could be studied as a part of the proposed "NPT Compliance/Disarmament Alternative" to the Complex 2030 PEIS.

The costs of increased security must also be considered in the PEIS.

## **OVERALL COSTS OF THE COMPLEX 2030**

Complex 2030 is intended to give DOE the resurgent Cold War-era production capability to fully carry out the RRW program by the year 2030. This means 3 decades of building new nuclear weapons plants, including a new Rocky-Flats style facility to manufacture plutonium bomb cores. One factor that was noticeably missing from the various complex 2030 hearings were cost estimates presented by the Department of Energy.

The Government Accountability Office (GAO) had released a cost estimate that the Complex 2030 would likely cost upwards of \$150 billion dollars. The GAO also notes "DOE's history of poor project management," meaning implicitly that figure could be larger yet. If one divides \$150 billion by the 23 or so remaining fiscal years to 2030, the quotient is \$6.5 billion per year. This is an interesting figure that very closely matches current NNSA Congressional Budget Requests per year for "Total Weapons Activities." NNSA itself says there will be a long transition period in which Life Extension Programs and the rest of the Stockpile Stewardship Program continue while Reliable Replacement Warheads are phased in. Does this mean that NNSA nuclear weapons budgets will inevitably rise when one of the professed reasons for RRW is to lower costs?

Some, even within the DOE, believe that \$150 billion is an extremely low estimate for the cost of maintaining the current system while building a new not-so-consolidated set of facilities and then transitioning over to them. The costs of this should be included in the draft PEIS so that the public and officials can have a picture of the full costs of this project.

In sum, the draft PEIS should include a detailed cost analysis for each alternative listed. A Curatorship alternative (see below), for example, will have a much lower cost than the options currently being considered by DOE. These safer, more secure, options that focus on maintenance of the existing arsenal (Curatorship) and on compliance with the nuclear Non-Proliferation Treaty (disarmament) are viable, reasonable, and must be analyzed -- including their relative costs.

## **ENVIRONMENTAL JUSTICE ANALYSIS**

President Clinton's Executive Order 12898 (59 FR 7629) mandated that federal agencies consider the potentially disproportionate effect of their activities on minority and low-income communities.

Throughout history the native people of the United States have borne many of the highest costs of US nuclear dominance. The mining was done on land given to native people, the milling and processing has often occurred on native land, the testing of the weapons and ultimately the disposal is slated for native land. Through this process, the US government has continued to disregard (for example, Yucca Mountain Final EIS) its agreements between Western Shoshone Nation in the Treaty of Ruby Valley of 1872. The SEIS must include an explanation of how the DOE/NNSA can ignore an agreement between the US government and the Western Shoshone, which is a treaty between nations and the highest law of the land. Further, if the DOE/ NNSA uses the claim that lands were taken by the U.S. through gradual encroachment as the quasi-judicial Indian Claims Commission (ICC) alleged and upheld by the subsequent Supreme Court decision (*Dann vs US Government*) that the Western Shoshone lost title of their land, then it must explain how a ruling of a court within one nation (US Supreme Court) is binding upon both nations.

Further, the DOE/NNSA needs to address the decisions of the Organization of American States Inter-American Commission on Human Rights (IACHR) and the United Nations Committee to Eliminate Racial Discrimination (UNCERD) which both found the U.S. to have violated the fundamental human rights of the Western Shoshone people with regard to the Indian Claims Commission Proceedings which led to the Supreme Court decision. On March 9, 2006, UNCERD again urged the United States to “freeze”, “desist” and “stop” actions being taken, or threatened to be taken, against the Western Shoshone Peoples of the Western Shoshone Nation, including threats related to ongoing weapons testing at the Nevada Test Site as well as efforts to build an unprecedented high-level nuclear waste repository at adjacent Yucca Mountain. The SEIS needs to take into consideration both the IACHR and UNCERD decisions and describe the proposed action in the context of these decisions.

## **RELATIONSHIP TO OTHER NEPA DOCUMENTS**

DOE/NNSA should issue a Notice of Intent to prepare a new PEIS and not a Supplement to a PEIS that is 10 years out of date. The Notice of Intent to Prepare a Supplement to the Stockpile and Stewardship and Management Programmatic Environmental Impact Statement – Complex 2030 ((NOI) purports to be based on the Environmental Impact Statement (SSM PEIS of November 19, 1996 and Record of Decision issued December 26, 1996). The current proposed NOI Supplement to the 1996 SSM PEIS is based on a document that is ten years out of date.

The 1996 SSM PEIS differed remarkably from what is envisioned by the current NOI. The NOI envisions changing the size, composition and character of the nuclear weapons stockpile through the design of a new generation of nuclear weapons by the RRW program.

The NOI of DOE/NNSA fails to set forth the relationship of this Supplement PEIS to other DOE/NNSA documents and programs. The NOI presents a confusing muddle of documents that were not included in the 1996 SSM PEIS because they occurred subsequent to the SSM PEIS of 1996. The SSM PEIS may not have relied upon the later dated documents. The NOI does not set forth the modifications to the SSM PEIS (1996) that were based on later documents. The NOI does not include citation to documents upon which the SSM PEIS may have been based, but upon which DOE/NNSA does not intend to use for the Supplement. DOE/NNSA should provide



a complete listing and presentation of all documents upon which it intends to rely on for its Complex 2030 Supplemental PEIS on its website. Also, all reference documents for the Supplemental PEIS should be on that website.

Does not include Livermore Lab SWEIS – particularly relevant to hydrodynamic testing

## **NEED TO INCLUDE AN ALTERNATIVES THAT COMPORT WITH AND ENHANCE U.S. AND INTERNATIONAL LAW, WITH A FOCUS ON OUR NUCLEAR NON-PROLIFERATION TREATY OBLIGATIONS**

**NON-PROLIFERATION TREATY COMPLIANCE:** The draft PEIS must examine an alternative in which the US meet its nuclear Non-Proliferation Treaty obligations, including a scenario which establishes a baseline goal of **0 nuclear weapons by 2030 or at a date certain thereafter**. This scenario would require a plan for the reduction of current weapons development operations at active facilities and a parallel increase in the activities necessary to perform critical storage, disassembly, dismantlement, and disposition missions.

Consideration of this Alternative may stimulate further opportunities to consolidate/co-locate facilities in order to best position ourselves for the day when we do fully meet our treaty obligations. Further, it provides for the comparison of costs (short term and long term) associated with all reasonable options.

It is reasonable to expect that, by 2030, the United States will have greatly reduced stockpile support needs and no need for a new nuclear warhead; the Complex 2030 document should imagine that more likely world -- and prepare an Alternative which reflects that reality. This Alternative would envision the phasing out of production activities at Y12, abandon the idea of a new plutonium pit production facility, phase out (and not ramp up) "replacement" pit production at Los Alamos, ramp down hydrodynamic tests and eliminate those that do not support maintenance and dismantlement, ramp down tritium activities across the complex and limit them to those that support maintenance and dismantlement, and so on.

A careful and serious study of this alternative in the Complex 2030 PEIS. This could be called the NPT Compliance/Disarmament alternative.

**CURATORSHIP:** A “Curatorship” approach that maintains the current stockpile through surveillance, non-nuclear testing and repair could accomplish the major stated goals of Complex 2030 -- in particular, the ensured safety/reliability of the stockpile (consisting of previously tested designs), no return to testing, increased dismantlement, removal of dangerous/ vulnerable nuclear materials from many sites, and economic/programmatic efficiency — while better meeting our nation’s disarmament obligations. For a detailed description of the Curatorship alternative, please see "Managing the U.S. Nuclear Weapons Stockpile: A Comparison of 5 Strategies," by Dr. Robert Civiak, July 2000. It is available at [www.trivalleycares.org](http://www.trivalleycares.org), and we incorporate it in our scoping comment.

## **FORMAT OF HEARINGS**

We do not support the “poster session” only style format. These are extremely complex plans and ideas that community member need a dynamic forum to begin to understand. By dynamic, I

mean facilitated questions and answers following a presentation by the Department of Energy. Otherwise these “poster sessions” will continue to simply be a time for officials to stand around and talk to each other.

We believe that a combination of “open house” hours and a facilitated hearing is the best way to maximize the solicitation of scoping comments and inform the public of the proposed action. The synergistic effect of people hearing and responding to the comments and questions of others is not available in a mere poster session.

We are also requesting that the DOE/NNSA hold public hearings for the scoping and the draft PEIS at major metropolitan locations throughout the United States. An earlier 1991 scoping plan for a PEIS for Reconfiguration of the Nuclear Weapons Complex (“Complex 2010”) included 15 locations in the United States which are existing DOE sites. Currently the DOE/NNSA plans to conduct scoping meetings for the SEIS at only 12 locations.

*Limiting scoping and public hearings to sparsely populated areas surrounding DOE facilities prevents major metropolitan populations from participating in the scoping and hearing processes.* In many instances from full participation in environmental concerns that are both national (and international) in scope. These concerns involve:

- Increased transportation of radioactive and hazardous wastes through urban communities;
- Radiation exposure whether caused by accidental releases or potential terrorist attacks during transport;
- Environmental justice issues;
- Thefts of radioactive materials and use in terrorist weapons;
- Proliferation of nuclear weapons; and
- Potential increase in pollution and contamination to the air, land and environment from releases of toxic substances.

Since the resumption of nuclear weapons manufacturing, disarmament and proliferation are issues of national and international importance, additional locations within the United States should include major cities with large populations such as Seattle, WA; Portland, Oregon; Los Angeles, CA; San Diego, CA; Phoenix, AZ; New York City, NY; Boise, ID; Las Vegas NV; Atlanta, GA; Minneapolis, MN; Philadelphia, PA; Chicago, IL.

Cities along transportation corridors for nuclear materials and waste transport should also be included as well. DOE/NNSA must also include, during the scoping hearings and public hearings for the Draft PEIS, discussion about the transportation corridors which will be related to the possible choices for construction of the Pit Facility.

We request that Tri-Valley CAREs be notified of developments in the Complex 2030 plan including but not limited to early notice of the draft document and public hearing schedule. We request that the public notice for hearings be published at 45 days in advance of the first hearing and that the comment period on the draft document be at least 90 days.

Thank you for this opportunity to comment.

Sincerely,

Loulena Miles  
Staff Attorney  
Tri-Valley CAREs