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December 5, 2017

United States Department of Energy
National Nuclear Safety Administration
Livermore Field Office
P.O. Box 808, L-293
Livermore, CA 94551-0808
LFOPPublicComment@hq.doe.gov

Dear U.S. Department of Energy:

Subject: Proposed Action at Site 300 of the Lawrence Livermore National Laboratory

On behalf of the Tracy City Council, thank you for the opportunity to comment on the Department of Energy National Nuclear Safety Administration Livermore Field Office Draft Environmental Assessment (Draft EA) related to increased detonations of explosives at the Experimental Test Site (Site 300). We are concerned and opposed to the proposal to increase the weight of explosives for outdoor tests at Site 300. We understand the Proposed Action to involve a ten-fold increase in the detonation of explosives from 100 pounds per day to 1000 pounds per day, and a more than seven-fold annual increase from 1000 pounds per year up to 7,500 pounds per year. Such an increase is not well-defined in the Draft EA, and surely will generate noise impacts more widely heard and felt from what is described in the analysis.

The City of Tracy understands and respects the national security-related missions of the Lawrence Livermore National Lab and Site 300. However, the City opposes the Proposed Action in order to maintain compatibility between the operations of Site 300 and the planned residential neighborhoods of Tracy Hills.

We are concerned the Proposed Action will be a detriment to the citizens of Tracy, will negatively impact the quality of life of existing residents, and will negatively affect the viability of future neighborhoods in the Tracy Hills project area.


Please consider the following items as part of the project and analyze them as part of the Draft EA.

1. Figure 1 of the Draft EA is misleading and incorrectly identifies Site 300 as located nearly half way between the City of Livermore and the City of Tracy. It is not. Site 300 lies approximately 7000 feet from the City of Tracy limits. Please correct this Figure and associated Figures in the analysis and Appendices of the Draft EA. Additionally, Page 2 of the Draft EA states that the Tracy Sphere of Influence and Tracy Hills are 4.16 miles from the firing table at Building 851. We are concerned that this information is not correct and that Building 851 and the firing table are indeed closer to Tracy City limits than stated. This has the potential to result in inaccurate conclusions relative to noise impacts. Such discrepancies should be explained and re-analyzed as a means to properly disclose and inform Tracy residents.

2. The Draft EA, Section 3.8.2 Impulse Noise states on page 27, "These activities are not in conflict with land use compatibility guidelines." Please inform the City of Tracy what land use compatibility guidelines were used and where they can be reviewed. They should be clearly identified in the Draft EA and the analysis should show how this conclusion was reached.
3. The Noise analysis fails to show noise levels to be expected in Tracy Hills. The Draft EA states that the weighted day/night average sound level (CDNL) would be 57 dB in residential areas. How is the day/night average an appropriate measuring tool given that the Draft EA states that the noise impulses are typically one second in duration per event? The City would like to know what noise levels can be expected in residential areas per event. Similarly, what sound pressure level (dB) is expected to occur at the closest residential area of Tracy Hills?
4. Section 4.1.5 Noise, page 45 states that the Proposed Action was modeled for 15% of the explosion events exceeding 129 dB (sound pressure), but doesn't disclose what the anticipated dBs would be for those events that would exceed 129 dBs. Why? Would they be higher than 129dBs? The City of Tracy requests that the Draft EA Noise analysis disclose what the decibel (sound pressure) would be for those events that occur 15% of the time and wishes to see the noise contours identifying the noise impacts relative to the residential portions of the Tracy Hills project and beyond the City limits.
5. The City requests a 60-day extension (from the original end date of December 7, 2017 of the comment period) to February 5, 2018 in order to better understand the noise impacts to this community as a result of the Proposed Action, which is technical in nature.
6. In an effort to better further awareness and understanding of the Proposed Action and to receive answers to questions that our community members might have about this Proposed Action, we request that the LLNL conduct a publicly noticed evening community meeting with representatives from LLNL and NNSA in Tracy during the same time period as the comment period extension request (prior to February 5, 2018).

Thank you, again, for the opportunity to review and comment on the Draft EA related to increased detonations of explosives at Site 300. If you have any questions or would like to discuss any of these items, please contact Randall Bradley, Interim City Manager, at Randall.Bradley@cityoftracy.org or (209) 831-6115.

Sincerely,



Robert Rickman
Mayor, City of Tracy

cc: Tracy City Council