

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

THE LOS ALAMOS STUDY GROUP,

Plaintiff,

v.

Case No. 1:10-CV-0760-JH-ACT

UNITED STATES DEPARTMENT OF  
ENERGY; THE HONORABLE STEPHEN  
CHU, in his capacity as SECRETARY,  
DEPARTMENT OF ENERGY;  
NATIONAL NUCLEAR SECURITY  
ADMINISTRATION; THE HONORABLE  
THOMAS PAUL D'AGOSTINO, in his  
Capacity as ADMINSTRATOR,  
NATIONAL NUCLEAR SECURITY  
ADMINISTRATION,

Defendants.

**AFFIDAVIT OF Jody Benson**

State of New Mexico            )  
  ) ss.  
County of Los Alamos         )

Jody Benson, under penalty of perjury, hereby declares as follows this 2 day of  
November 2010:

1. I am a citizen of the State of New Mexico and reside in the county of Los Alamos.  
I work with the Earth and Environmental Sciences Division at Los Alamos National Laboratory;  
our Division has teams located in TA-3 as well as TA-51 and TA-48 on the Pajarito Corridor. I  
am writing these views as a private citizen; however I am active in the community of Los

Corridor construction sites, as well as State Route 501, the main “Hill” road. I perceive the following harms to the economy and community values of Northern New Mexico, specifically Los Alamos, if the project continues as now planned:

A. Traffic Impacts on St. Rd. 4: The current NEPA document does not include a regional assessment of traffic impacts. The thousands of haulage trucks would likely necessitate upgrading State Rd 4 from “the Y” (juncture of NM 502 and NM 4) to Pajarito Rd, including widening the road and upgrading the traffic signals. Unless these requisite upgrades are paid for by the project, they would commit our very limited State transportation money to a very small, and currently inadequate five-mile stretch of road and four intersections.

B. Traffic Impacts of the Parking Lot on the Truck Route and Sandia Canyon: Included in traffic impacts: The proposed parking lot in Sandia Canyon (the Truck Route) from which buses will transport the workers to the Pajarito Corridor must be readdressed. Thousands of workers commute to LANL every day. Including another thousand cars, then creating a parking lot below TA-55 would not only destroy a large ecosystem, but require significant upgrades to the Truck Route. The traffic to the proposed parking area would impede normal LANL-commuter traffic; a signal would be required.

C. Need for a regional traffic assessment that includes an analysis of the benefits of a shared commuter parking area (e.g., at one of the casinos), and establishing a commuter-bus system from those parking lots that already exist. This would reduce excessive damage to the fragile Pajarito Plateau ecosystem as well as to commuters who are likely to experience delays, broken windshields, and other hazards and harms. Project funding should include leasing parking.