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Docket: NRC-2026-0100

Fermi America LLC (dba Fermi America); President Donald J. Trump Advanced Energy and Intelligence Campus, Units 1-4; Notice of Intent to Conduct Scoping Process and Prepare an Environmental Impact Statement;

Comment On: NRC-2026-0100-0001

Fermi America LLC (dba Fermi America); Project Matador Advanced Energy and Intelligence Campus AP1000 Units 1-4, Project Matador Nuclear Units 1-4; Notice of Intent To Conduct Scoping Process and Prepare an Environmental Impact Statement

Document: NRC-2026-0100-DRAFT-0011

Comment on FR Doc # 2026-05487, NRC-2026-0100-0001, from Artanis Industry Communities, LLC

Submitter Information

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Organization: Artanis Industry Communities, LLC

General Comment

Docket ID: NRC-2026-0100

Submitted by: Artanis Industry Communities (AIC), a division of Artanis Capital, LLC

Contact: Alexander Abrams, Chief Executive Officer | ahomeforindustry.com

Artanis Industry Communities (AIC) respectfully submits these comments as an interested party under 10 CFR 51.28(e), requesting participation in the scoping process for the Project Matador Nuclear (PMN) Units 1-4 Environmental Impact Statement. AIC is a division of Artanis Capital, LLC. We design, deploy, and operate purpose-built modular workforce housing communities for nuclear, LNG, data center, and industrial megaprojects. Our comments address the socioeconomics, land use, and transportation resource categories identified in the Notice.

CORE SUBMISSION: Workforce Housing Is a Primary EIS Scope Issue

The Notice identifies socioeconomics as a resource category for full EIS analysis. AIC respectfully submits that for Project Matador, workforce housing is among the most consequential and foreseeable environmental impacts the EIS must address — and the one most amenable to prevention through early, rigorous scoping.

Carson County has a total population of approximately 5,822 residents and a housing stock of approximately 2,854 units. The Project Matador campus — encompassing four AP1000 nuclear units, combined-cycle gas, solar, battery storage, and up to 30 million square feet of hyperscale data infrastructure — is projected to require a peak construction workforce of 3,000-10,000 workers. At any credible estimate, that workforce will materially exceed the county's entire existing population and

housing stock. This ratio is the variable most directly correlated with the socioeconomic failures documented at every comparable nuclear megaproject in recent history.

THE DOCUMENTED PATTERN IS REPEATING NOW

Plant Vogtle (Burke County, GA): Over 9,000 peak workers, no housing plan. Workers scattered in RV parks at \$650/month. Burke County experienced 20–30% monthly swings in sales tax revenue. When construction ended, workers left overnight — the county kept nothing. Final cost: \$36 billion, 102% over budget, 7 years late.

TerraPower/Natrium (Kemmerer, WY): Construction workers arriving before any housing plan exists. Local rents surged from \$650 to \$2,500/month. EPC partners are now retrofitting housing solutions mid-project.

Stargate AI (Abilene, TX): 6,000 workers hit a city with a pre-existing 5,600-unit housing shortage. Housing emergency declared mid-construction.

Project Matador is larger than all three. Carson County has fewer resources than any of their host communities.

REQUESTED EIS SCOPE TOPICS

AIC requests the NRC confirm the following as within the EIS scope:

1. Phased workforce demand — full analysis across all concurrent campus activities (nuclear, gas, solar, data center), not nuclear units alone.
2. Regional housing capacity — baseline inventory, vacancy, affordability vs. projected demand; modeled rent and displacement effects on existing residents.
3. Purpose-built modular workforce accommodation — evaluated as a primary socioeconomic mitigation measure, reducing market pressure, cutting vehicle miles traveled, improving retention, and leaving lasting county infrastructure.
4. Community infrastructure capacity — road adequacy, EMS/fire capacity, water and sewer availability.
5. Environmental justice — equitable distribution of housing cost burden on low-income Carson County residents.
6. Cumulative campus impacts — combined workforce demand from all phases, not nuclear units in isolation.

A full technical brief is attached as a PDF supplement to this comment.

Respectfully submitted,
Alexander Abrams, Chief Executive Officer
Artanis Industry Communities, a division of Artanis Capital, LLC
ahomeforindustry.com | April 20, 2026 | Docket ID NRC-2026-0100

Attachments

AIC-Fermi-Matador-EIS-Brief

Artanis Industry Communities

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TO: Nuclear Regulatory Commission — Environmental Project Manager Mary Richmond
FROM: Artanis Industry Communities — Alexander Abrams, Chief Executive Officer
RE: Socioeconomic Scoping Comment — Project Matador Nuclear EIS (NRC-2026-0100)
DOCKET: Nos. 05200051, 05200052, 05200053, 05200054 | FR Doc. 2026-05487
DATE: April 20, 2026

The Nuclear Housing Blindspot Is Already Repeating. The Project Matador EIS Must Address It Now.

Artanis Industry Communities submits this brief as a supplement to its public scoping comment filed April 20, 2026 under Docket ID NRC-2026-0100. AIC is a division of Artanis Capital, LLC. We design, deploy, and operate purpose-built modular workforce housing communities for nuclear, LNG, data center, and advanced manufacturing megaprojects. This brief provides the site-specific data, precedent analysis, and specific EIS scope requests that AIC asks the NRC to incorporate into the Project Matador Environmental Impact Statement.

5,822	2,854	3,000–10,000	0
Carson County population	Total county housing units	Peak construction workers projected	Active workforce housing plans on file

I. The Housing Gap Is the Largest Foreseeable Environmental Impact

The NRC's Notice identifies **socioeconomics** as a resource category for full EIS analysis — alongside air quality, water resources, ecology, land use, and transportation. For Project Matador, workforce housing is not a secondary socioeconomic variable. It is, by the numbers, the most extreme mismatch between project demand and host community capacity of any proposed nuclear construction project in U.S. regulatory history.

Carson County's total population is approximately 5,822 residents with a housing stock of 2,854 units. The Project Matador campus — four AP1000 units, combined-cycle gas, solar, battery storage, and up to 30 million sq ft of hyperscale data infrastructure — is projected to require peak construction labor of 3,000–10,000 workers. Westinghouse's PwC analysis of a *two-unit* AP1000 program alone projects an average annual workforce of 10,500. Project Matador is a four-unit program with a full HyperGrid campus on top. At any credible estimate, the construction workforce will exceed the entire county population and represent a multiple of the entire county housing stock.

"The workforce-to-housing ratio at Project Matador is the variable most directly correlated with cost overruns and schedule failure at every comparable nuclear project in recent history. Scoping is the right moment to address it."

II. The Pattern Is Documented — and Actively Repeating

Plant Vogtle — Burke County, GA. \$36B final cost (102% over budget). 7 years late. 9,000+ peak workers scattered in RV parks at \$650/month with no housing plan. Burke County absorbed 20–30% monthly sales tax swings. When construction ended, workers left overnight. The county kept nothing. Workforce instability driven by housing failure is a documented contributor to the cost collapse.

TerraPower/Natrium — Kemmerer, WY. Nuclear construction workers arriving before any housing plan exists in a town of 2,400. Local rents surged from \$650 to \$2,500/month. Workers sleep in Kemmerer but spend money 45 miles away in Rock Springs — structural economic leakage. EPC partners are now retrofitting housing solutions mid-project.

Stargate AI — Abilene, TX. 6,000 construction workers arrived in a city with a pre-existing 5,600-unit housing shortage. Every motel filled. RV parks maxed out. Housing emergency declared mid-construction. City awarded massive tax incentives and received a housing crisis in return.

Hinkley Point C — Somerset, UK. 26,000 peak workers. Local rents doubled. Families received eviction notices as landlords converted to higher-paying construction tenancies. EDF proposed a 1,000-bed modular housing campus — then scrapped it in early 2026. The host community bore the consequences.

Project Matador is larger in scale than all four reference projects. Carson County has fewer pre-existing housing resources than any of their host communities. The EIS must address this directly — in scope, from the outset.

III. What the EIS Must Scope — AIC's Six Requests

- 1. Phased workforce demand analysis.** Full construction-phase labor demand projection across all concurrent campus activities — nuclear, gas, solar, data center — not nuclear units in isolation. Peak overlap periods must be modeled.
- 2. Regional housing capacity and affordability.** Baseline inventory, vacancy, and affordability in Carson County and the Amarillo MSA vs. projected demand. Modeled rent inflation and displacement effects on existing low- and moderate-income residents.
- 3. Purpose-built modular workforce accommodation as primary mitigation.** Properly sited modular communities reduce regional housing market pressure, cut vehicle miles traveled (directly mitigating transportation and air quality impacts enumerated in the Notice), improve worker retention, generate county fiscal benefit, and can leave transferable infrastructure upon project completion. This is the most consequential mitigation measure available — it must be analyzed as such.
- 4. Community infrastructure capacity.** Road adequacy vs. construction traffic, EMS/fire capacity, water and sewer availability near the campus and any workforce housing sites.
- 5. Environmental justice.** Equitable distribution of housing cost burden and service strain on existing Carson County residents, particularly low-income and minority populations bearing disproportionate impacts without commensurate economic benefit.
- 6. Cumulative campus-scale impacts.** Combined socioeconomic footprint of all concurrent construction phases — the EIS must not artificially understate impacts by analyzing nuclear units in isolation from the broader HyperGrid campus buildout.

IV. AIC's Model — and Our Ask

Artanis Industry Communities does not build worker camps. We build planned communities — with permanent roads, utilities, services, and infrastructure built to county standards — designed from day one to outlast the construction phase. When modular residential units eventually redeploy to the next project, what remains in the host county is a fully serviced district available for repurposing: workforce rental housing, affordable homes, community infrastructure. The workers leave. The investment stays.

AIC operates dirt-to-key: we site, entitle, finance, build, and manage the community. Fermi America and its EPC partners stay focused on building a nuclear plant, not managing a residential enclave. Carson County gains a long-term asset, not a liability.

	Vogle / RV Camp Model	Artanis Industry Communities Model
Housing type	RV parks & trailers	Planned modular community
Infrastructure built	None for the county	Roads, water, sewer to county standard
When workers leave	Ghost town / revenue collapse	Permanent county asset remains
County role	Passive bystander	Active development partner
Schedule impact	Turnover risk → cost overrun	Retention support → schedule integrity

One Ask: Confirm These Six Topics Are in the EIS Scope

The scoping process is the most efficient intervention point in the NEPA review. Scope inclusions determined now cost nothing to add and give the NRC, Fermi America, and Carson County the benefit of rigorous analysis before construction commitments are made. Scope gaps discovered after the draft EIS is published — or after construction begins — are exponentially more costly to address.

AIC has studied these dynamics at VC Summer, Vogtle, TerraPower Natrium, and the Project Matador site directly. We are available to provide technical assistance, site-specific data, and analytical support to Environmental Project Manager Mary Richmond and to Fermi America's applicant-prepared EIS team throughout the review process. We look forward to reviewing the draft EIS when published in June 2026.

Alexander Abrams, Chief Executive Officer

Artanis Industry Communities, a division of Artanis Capital, LLC

ahomeforindustry.com

Submitted April 20, 2026 | Docket ID NRC-2026-0100 | FR Doc. 2026-05487 | 91 FR 13641

This comment is submitted pursuant to 10 CFR Part 51 and 10 CFR 51.28(e). Participation in this scoping process does not constitute a petition to intervene under 10 CFR 2.309.