



STATE OF WASHINGTON  
**DEPARTMENT OF ECOLOGY**

Richland Field Office

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May 27, 2022

22-NWP-087

Steve Wiegman, Chair  
Hanford Advisory Board  
245 Torbett Street  
Richland, Washington 99354

Re: Response to Hanford Advisory Board Consensus Advice #311 on Hanford Advisory Board Membership Changes

Dear Steve Wiegman:

The Department of Ecology (Ecology) has reviewed Hanford Advisory Board (Board) Consensus Advice #311. As I shared in remarks at the Board's Leadership Workshop on May 18, 2022, the Board is an essential voice of the community. As the most diverse stakeholder group with a wide breadth of historical knowledge, Ecology depends on the Board to provide us advice on important decisions we make as a regulator.

In response to Advice #311, Ecology has the following observations and concerns regarding the changes to the Board, some of which we shared during Board meetings earlier this year:

- Ecology supports the push for diverse representation and environmental interests with the Board. However, we are concerned at the loss of institutional knowledge that will come with the enforcement of term limits and the lack of support mechanisms to preserve that institutional knowledge.
  - We would like to work with the United States Department of Energy (USDOE), the United States Environmental Protection Agency (EPA), and the Board to create a transparent and collaborative process that helps retain the important institutional knowledge the Board needs to draft advice.
- There is also a need to educate and engage the next generation of members to ensure there is an informed and active Board able to provide informed, risk-aware, and relevant advice.
  - Efforts to support and onboard new members should be in addition to, and complementary to, regular board meetings, so time is not taken away from the important work the Board is doing.

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- Ecology would like to see a continued collaborative approach to creating meaningful orientations that provide adequate support to new Board members.
- Ecology has expressed concerns about treating Board members differently in regard to the new exemption process, depending on if the seats are specifically named in the Memorandum of Understanding for the Board.
  - In February, EPA and Ecology requested to USDOE that the Tri-Party Agreement (TPA) Agencies develop a clearly defined written process for term limit exemptions and outreach for vacant seats that **all** parties need to follow.
  - The TPA Agencies recently started reviewing and updating the Board Nomination and Application Process document to accommodate this request.
  - Ecology will work with USDOE and EPA to ensure this process is in place before the next membership cycle.
- Ecology was also disappointed in the level of collaboration between USDOE and Board members regarding changes to the Board prior to implementation. We have been working with USDOE to ensure a more collaborative process with the TPA Agencies and the Board moving forward.
- Ecology continues to be concerned with the length of time needed to submit and approve nomination packets through USDOE headquarters. That process this year will result in a gap of more than three or four months with no Board chair or vice-chair, since the existing leadership is term-limiting out in June and the packet won't be approved until fall.
  - The TPA Agencies worked together to move forward with interim leadership elections at the June 2022 full Board meeting to ensure there is leadership between June and the approval of the membership packet.
  - Board members who are not term limiting out, but who are in the submitted membership packet are also being granted membership extensions for this time period.
  - To avoid future quorum and leadership lapses, HAB membership terms now coincide with the federal budget cycle. This will eliminate the roughly July 1 to September 30 vacancy gap. This does not change the amount of time required for the packet to get approved.
- Ecology is continuing to insist on a more collaborative approach to the Board with USDOE and EPA, including greater engagement and transparency with Board members.

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The Board is an essential component of our work, and we appreciate each member's willingness to serve. We believe that a collaborative, transparent, and proactive relationship between the TPA Agencies and the Board creates a supportive group of citizens and stakeholders that can take some of our biggest priorities to a much larger audience.

If you have any questions regarding these observations and concerns, please contact me at [david.bowen@ecy.wa.gov](mailto:david.bowen@ecy.wa.gov) or (509) 372-7905 or Ryan Miller, Communications Manager, at [ryan.miller@ecy.wa.gov](mailto:ryan.miller@ecy.wa.gov) or (509) 537-2228.

Sincerely,

A handwritten signature in blue ink that reads "Stephanie Schleif".

*for*

David B. Bowen  
Program Manager  
Nuclear Waste Program

cc electronic:

Robert Armijo, EPA  
Dave Einan, EPA  
Geoff Schramm, EPA  
Todd Shrader, USDOE-EM  
Ike White, USDOE-EM  
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