

TRI-PARTY AGREEMENT
HANFORD PUBLIC INVOLVEMENT PLAN

(Formerly known as the Community Relations Plan)

Comment and Response Document

October 2012



Tri-Party Agreement

U.S. Department of Energy
Washington State Department of Ecology
U.S. Environmental Protection Agency

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1.0 Introduction

The Comment and Response document summarizes and responds to public comments received on proposed changes to the Hanford Public Involvement Plan (Plan), formerly known as the Community Relations Plan. Comments are identified by number. Long, detailed comments were separated by topic and identified with a number and letter (e.g. 1. John Smith, Comment A).

2.0 Community Involvement

A formal public comment period on the proposed changes, originally scheduled to run from October 10 through November 8, 2011, was extended through December 15, 2011 in response to requests from stakeholders. Individuals sent written comments by mail and electronically. Written and verbal comments were collected during the webinar and at the two in-person public meetings held in Seattle and Spokane, WA. Comments received after the end of the public comment period were considered to the extent practicable.

The Tri-Party Agreement (TPA) agencies (Parties) mailed a fact sheet to approximately 2,300 individuals on the Hanford Mailing list on October 6, 2011. It provided information on the proposed changes to the Plan and information on the webinar and public meetings. The webinar, public meetings and comment period were publicized in a Hanford Electronic Listserv message sent to an estimated 700 individuals on September 29, 2011 with the fact sheet attached. The Parties also created a YouTube video (**available at <http://www.youtube.com/watch?v=8HrRddxXu64>**) that briefly discussed the proposed changes to the Plan and information on how to provide public comment. The Parties placed ads in the *Tri-City Herald* on November 7, 2011 and the *Seattle Weekly* on November 9, 2011. Additional articles on the webinar and public meetings were published in the *Tri-City Herald* (November 9, 2011), online at www.nwcn.com (Northwest Cable News), and in the *Tacoma News Tribune* (November 7, 2011).

Below is a summary of the number of individuals who participated in the webinar and public meetings (excluding agency staff):

November 9, 2011 Webinar

16 participants

November 15, 2011 Public Meeting in Seattle, WA

Approximately 26 participants

November 16, 2011 Public Meeting in Spokane, WA

5 participants

Presentations from the public forums are in Appendix A. Appendix B provides an alphabetical index of commenters matched to their comments and respective page numbers. All comments received during the public comment period are in Hanford's Administrative Record in a file titled "Public Comments Received on Proposed Changes to the Tri-Party Agreement Public Involvement Plan."

3.0 Significant Changes Based on Public Input

As a result of public comment, several additional revisions to the proposed changes to the Hanford Public Involvement Plan were made. The major changes were:

- Adding a Preface with a purpose statement to the Plan
- Adding Appendix A, the Frequently Asked Questions document that includes a concise explanation of how to request a public meeting or hearing
- Updating the Hanford Decision Making Process flow chart diagrams and associated text that describe regulatory decision-making processes at Hanford
- Adding more information on the Hanford Budget process
- Clarifying the description of the annual evaluation of public involvement at Hanford

4.0 Comments and Responses

More than 150 comments were received from 42 individuals and groups covering a wide range of topics and varying perspectives. The public comments were identified and aggregated into one the following categories:

- Importance of Public Involvement
- Outreach/Public Education Opportunities
- Webinar Feedback
- Proposed Deletions to the Plan
- Proposed Additions to the Plan
- Proposed Updates to Figures in the Plan
- Public Meetings
- Communication and Meetings Materials
- Public Notices
- Public Involvement Evaluation
- Annual Updated Goals and Action Plan
- Public Involvement Commitments/Requirements
- Public Comments
- Public Comment Periods
- Funding for Public Participation Groups
- General Comments

The comments in each category and sub-category are listed below. The Parties' response to each category of comments is provided in ***bold italicized text***.

4.1 Importance of Public Involvement

1. Nancy Kroening, Phoenix, Arizona

Comment I: I'm sorry I missed the Webinar. I pulled a muscle playing soccer with my grandson Tuesday and am recovering. I would like to know the outcome/issues discussed, though. I feel it is very important for the public to understand the potentially serious effects of activities at Hanford. And, to involve the public in decision-making so short-cuts won't be taken in clean-up.

2. Jeanne Raymond, Corvallis, Oregon

Comment B: The intent to enhance public involvement is good, as long as the original agreement to clean up the site, and then close the facility is the utmost priority.

3. Liz Mattson, Hanford Challenge

Comment F: I appreciate the agencies for providing opportunities to comment both in person, on webinars, on phone calls, and on paper and e-mail. I appreciate efforts to try new things, improving advertising for events and listening to and implementing suggestions for making information more understandable.

And I just wanted to say on top of this, a lot of times we talk about the agencies being responsible for all public involvement. And I think we have – we also have the ability as members of the public, for me as someone who works for a public interest group focused on Hanford cleanup, to take public involvement into our own hands. It is a setback that we have lost funding for some of our public involvement efforts, but there are creative ways to get public involvement efforts out there. We're trying one of them with our inheriting Hanford project that you can find out about on the back table.

4. Jim Kelley

Comment C: And finally, I did want to mention that it's probably not a project that a lot of folks here supported, but I did the – I wrote and worked on the Neighborhood Involvement Plan for CenturyLink Field. And when I was working on that project, we met with the neighborhoods, the three neighborhoods, extensively, hours and hours of meetings to develop that plan. And it was not a plan that was written by us at first and goal that, you know, developed the project or by the Public Stadium Authority. It was written collaboratively with the affected neighborhoods. And so that I thought was an excellent comment that was made earlier, that that's the way to do this kind of work.

And it is labor-intensive, and it is fairly expensive. But, you know, that was a project that cost less than one-fifth of Hanford's annual cleanup budget. So I think you can find the money to do this kind of stuff, really.

And so basically it does take hours of hashing these things out with the public in order to do it right. And so I just really would encourage you to, you know, rethink how you do something like developing a Public Involvement Plan.

And then finally, what came out of that plan was an actual agreement that was signed by all the parties, including representative of the international District, Pioneer Square, and the Sodo neighborhood.

Now, you know, I would love to see a Public Involvement Plan that could be signed not only by three agencies but also by the key stakeholders. And so I would encourage you to consider that too.

5. Dan Serres, Columbia Riverkeeper Conservation Director

Comment A: On behalf of Columbia Riverkeeper, please accept the following public comments on the proposed plan for public involvement at the Hanford site.

Columbia Riverkeeper is a 501(c)(3) nonprofit organization with thousands of members in Washington and Oregon. Our mission is to protect and restore the Columbia River, from its headwaters to the Pacific Ocean. Since 1989, Columbia Riverkeeper has played an active role in monitoring and improving cleanup activities at the Hanford Nuclear Reservation (Hanford). A legacy of the Cold War, the Hanford site continues to leach radioactive pollution into the Columbia River. Hanford's legacy is not a local issue. Nuclear contamination from Hanford threatens the Pacific Northwest's people, a world-renowned salmon fishery, and countless other cultural and natural resources. Hanford's contamination will pose a risk to the public and the environment for thousands of years. For this reason, region-wide public involvement is a necessity for effective cleanup.

Each summer Columbia Riverkeeper leads a series of kayak trips on the Hanford Reach of the Columbia River. During these trips, Columbia Riverkeeper's staff and members tour areas of the Hanford Reach that are currently being polluted by excessive levels of radioactive contaminants. The Hanford Reach is particularly unique because it is the last free-flowing stretch of the Columbia River. For example, during trips in 2010 and 2011, Riverkeeper's staff and members observed salmon &/or steelhead while kayaking past the Hanford site. On these educational tours, our members learn about the Endangered Species Act-listed salmon and steelhead that spawn, rear, and migrate in the Hanford Reach. Columbia Riverkeeper and its members recognize that soil pollution at the Hanford site poses a long-term threat to the Columbia River for future generations.

6. Ken Niles, Oregon Department of Energy

Comment E: I guess just a couple of comments I want to make. One is that we will submit formal comments in writing. So there is more to come. I would say that for the most part I think that we are in a generally pretty good period of time in terms of public involvement activities and interests by the Tri-Party Agencies. I think we have some very energized and involved and engaged public involvement people with each of the agencies.

You know, I think we've seen some improvement in terms of the notices and public involvement materials. It's never as consistently as good as any of us would want, but I think we are in, like I said, in a very good space.

Response to Importance of Public Involvement Comments: The Tri-Party Agreement (TPA) agencies (Parties) agree. Public involvement is an important part of the cleanup decision-making process at Hanford. We appreciate your feedback and will continue to work with our stakeholders and members of the public to explore new and better ways to improve public involvement processes and opportunities.

4.2 Outreach/Public Education Opportunities

7. Kristina Mageau, Olympia, Washington

Comment A: As a student of Antioch University (Seattle), I think this plan should include more ways for students to get involved. The Center for Creative Change, a program including Environment & Community majors, would be a great program to connect with for future meetings. There are other high schools & colleges throughout the PNW that should be reached out to, as well. Also, cultural awareness and sensitivity should be considered for future outreach. The working class folks near Hanford should be more closely tied to public involvement so that their voices are heard. The racial diversity could & should be worked on so that public involvement is more inclusive.

8. Linda Richards

Comment: I just taught my last class of Fall term and I want you to know that out of 27 students, most of all of them seniors in science disciplines, at Oregon State University in Corvallis Oregon only 3 had ever even heard of Hanford. We talked in class some about the cleanup, but not near enough, and I would like to see these hearings and more public education held at college campuses to properly inform students whose futures will be affected by the decisions made today. Please do more to involve young people and the public. I want to help and will rent a room here on campus for you all to use if you want to come down and educate about the cleanup, and I would like to invite the Oregon Hanford Waste Board too. Please let me know if there is anything I can do to increase discourse on the cleanup here at OSU, where I am a PhD (ABD) in the History of Science. I cannot go to Portland tonight but I really wish I could. I got an email today and this is the first I had heard of the meeting to be held, so is there some info list my email can please be added to?

9. Karin Engstrom, Seattle, Washington

Comment A: Thank you for the extension of the comment period. I was unable to attend the November 15th meeting in Seattle or participate in the Webinar. I've tried to take advantage of these public meetings because it helps to better understand the complexity of the projects. I've been commenting since 2002, but still lack the confidence of knowing how everything fits together.

I've read with interest, the draft Hanford Public Involvement Plan. It is readable, informative and very positive; however, some of the statements are unclear. For example:

- *Prepare future generations for informed engagement and participation.* (page 8)

This statement is enormous. I haven't done any thorough research on the subject, but having been in a Seattle high school for 18 years, I don't know of any classes that spend time on the Hanford area except as history – but certainly not addressing the ongoing story, the science, the consequences, etc. I would love to see this engagement with young people.

I attended a meeting at Seattle Center where university students were present and taking notes. I talked with them after Heart of America Northwest's preparatory meeting and was very excited to see them present and involved. I assumed or was told that they were there because of their professor. We need more educators like that one!

I read the summaries from the Advisory Public Involvement & Communications meeting of July 7th and September 22, 2010 where curriculum and student interest are discussed. I believe there could be enough interest for speaker presentations in science or history classes. Perhaps there should be a grant offered to a team of 2-5 teachers to put a curriculum together encompassing the human story along with the environmental/science. But before jumping into a curriculum, you need to conference with the various school districts and teachers to find out how flexible they can be. There is such a crush these days with the type of testing that is done. It has changed our educational system dramatically.

I've asked my students to become involved in writing comments on many issues, but their time is very limited with the crush of homework, social life and extra-curricular activities. I just met with students who participate in a program called Junior Statesmen of America. They actively study and participate in the legislative process – but know little about regulatory or planning processes. There has to be someone who is passionate about the Hanford story to trigger the interest of young people.

It is just as important to have Seattle high school students knowledgeable about Hanford as it is for young people in Richland. I've been reading [Area 51](#) by Annie Jacobsen. It is a pretty good picture of people who treated an area of Nevada like it had no value, including the people who lived there. They didn't relate or take into account the consequences of their actions. Maybe back in the 40's, 50's and 60's, we were not as aware of the consequences – but now we are. We must take responsibility and that must be conveyed to young people.

Will this be an honest commitment of the Public Involvement Plan?

10. Jacinta Heath, student at University of Washington

Comment A: My name is Jacinta Heath. I'm a student at the University of Washington. I'm actually doing my honors thesis on you guys's Public Involvement Plan, in looking at the changes that have been made, and just kind of taking note of who is present at these meetings and, you know, what sort of people are being represented within the decision-making process.

I like to see what you guys are doing different media outreach strategies. That's nice to see. I think if you increased – if you spent more time developing relationships with certain members of the community or, you know, certain professors at the university, that would be helpful in increasing involvement. If there was some sort of incentive for young people to get involved with the decision-making process that would be helpful, as well as getting more stakeholder perspectives involved in this.

Also, if the documents were more accessible to the general public, we would be seeing, you know, different sort of people involved. I'm concerned that there's a lot – you know, there's academic involvement. There's people who have been recruited from, you know, the community involving groups that you guys have been supporting in the past. But we're not seeing a lot of, you know, the common citizen getting involved in the decision-making process. And I think that's concerning, especially those who are disproportionately impacted by the activities that are going on at Hanford. We're not seeing a lot of those groups represented at these meetings. So, you know, if you guys could have a working group on increasing outreach to those populations that would – I'd like to see that.

11. Jim Kelley

Comment A: Yeah. It's Jim Kelley again. And that's K-e-l-l-e-y. Most people misspell that. I wasn't planning on comment, but I do have just a couple of things quickly that I wanted to mention. I hate to be nitpicky here. But in the comments that you made at the beginning of the meeting, Dieter, you mentioned often talking to groups. And it may sound picky, but language matters. And, you know, what we would hope in a process like this is that you are talking with groups. And so that's just, you know, maybe a little bit of a picky comment.

12. Bill Johns

Comment C: You already have one great public involvement thing, it would be reactor tours. Which unless you're there instantaneously, you can't get into it. So I would suggest that you use one that is very, very successful, maybe even charge for it, if you've got to, you know, pay the people who give the tours. I'm sure people would pay for that.

Response to Outreach/Public Education Opportunities Comments: Thank you for your comments. The Parties are committed to reaching out and engaging diverse populations in Hanford cleanup decisions. We work collaboratively and individually to provide a variety of public outreach and involvement activities. The U.S. Department of Energy (DOE) and the Washington State Department of Ecology (Ecology) have expanded Speakers Bureau programs that meet and discuss Hanford issues with organizations (e.g., Rotaries, Kiwanis, Chambers) and classes (middle school through college). We work with Hanford Communities on Hanford cleanup informational videos; sponsor exhibits at local and regional events (fairs, expos, etc.); produce agency and stakeholder updates; and communicate through social media.

DOE also offers two site tours. The Hanford Site Public Tour is available to members of the public. Classroom tours of the site may be available upon request. The B Reactor National Historic Landmark

tour provides visitors the opportunity to walk through the world's first full-scale nuclear reactor. Beginning in 2012, families with children 12 and over, along with middle school and high school classes are able to sign up for these tours. For more information on these programs and to find out more about public meetings, workshops and upcoming public involvement activities, please visit us at www.hanford.gov/, www.ecy.wa.gov/programs/nwp/, or access the TPA Public Involvement Calendar at http://www.ecy.wa.gov/programs/nwp/PI/pdf/TPA_PI_Calendar.pdf.

4.3 Webinar Feedback

13. Paul Randall, Minnesota

Comment A: Yeah, I'm Paul Randall. I happen to live in Minnesota. So I'm the guy that made the comment about this is a national, perhaps even an international issue and the comment that I was a little surprised and disappointed by the lack of participation.

I would also comment that you should not be discouraged that this first Webinar is not well attended. Having worked on promoting ideas in the past, it takes a tremendous amount of work and don't give up. You have a very important story to tell. You have some great input from people, like Manita, but do work on getting national recognition of what's going on and how important it is to every last citizen in the United States, how important it is to every citizen of the world. So don't give up. Keep up the good work. I have heard a lot of good things tonight. I think this story deserves to be told to a much wider audience.

14. John Howieson, Oregon Physicians for Social Responsibility

Comment: Yes, John Howieson. I'm with Oregon PSR, Oregon Physicians for Social Responsibility. I want to endorse the previous comments, all of them, but my comment is in line with the immediate previous speaker. In spite of the disappointing response to this Webinar, I think that it is the kind of technology, which is somewhat improved, could be very effective.

One of the things I think should be looked into is the possibility of trying to emulate more closely face-to-face public meetings by using the video capabilities of seeing the speakers, as well as hearing the speakers.

Furthermore, I think that the poor response to this particular Webinar may have to do with subject matter. Obviously, what happens with the contamination of the soil at Hanford by plutonium and cesium is much more of a hot button issue and much more likely to recruit people to join a Webinar than the current subject, which many people, although it's very important, many people could consider not something they want to join in and comment upon.

15. Liz Mattson, Hanford Challenge

Comment A: This is Liz Mattson and I work for Hanford Challenge, and I just wanted to echo some of the comments about the Webinar turn out tonight and not giving up on this method of involvement just because the turnout is not so good right now.

I agree with the comment about adding the video capability so we can see the speakers and make a difference. It adds a somewhat more personal touch to the experience of people. And I think as we experiment with this, it will feel more normal and will allow for more fun ideas to come up for how to get more engaging.

Also, I think there is a strong pull for people who are busy and doing a lot of work that they can be on the Webinar and do things like stress and eat dinner and be at home, instead of going out for a meeting. And I urge the agencies to keep trying to give people different options of how they can engage with different comment periods.

Comment C: Then just as a side note, I think another aspect of the turn out on this call, I think it has to do with people have the impression that someone is covering this issue, other people from my office, you can cover this one. Having been involved on the Hanford Advisory Board, I think that may be the case with some other people as well.

16. Dan Solitz

Comment: Good evening, this is Dan Solitz. Thank you for putting this on. I know this is your first effort. I enjoy a more technical meeting much more but this is the kind of stuff that has to be done to get the job done. I would like to, if you can get the face-to-face capability, I think that would be helpful and also I've seen a technical setting where you can put up more information on the screen. That would also be very helpful.

17. Gerald Pollet, Heart of America Northwest

Comment: This is Gerry Pollet, and one of the frustrating things here is that people have made some good comments that I think that other people probably would like to say yes or please answer that questions, and this format doesn't allow it, and it sounds as if people who have had experience with video formats believe that that might overcome it, and I encourage exploration of that. I am still disturbed at the notion that under this format a moderator can decide not to even ask a question that was sent in, and I believe that is totally inappropriate and would be the death knell of support for continuing this if that is the case.

If people could respond freely, there is no reason that I'm familiar with running Webinars, we've run several successful ones from Heart of America Northwest, there is no reason why everyone has to be on mute, but you can't all participate and say, yeah, what a great idea that is. With 16 people on-line, it would be very easy to do that, and I would like to make sure that if they are going to be Webinars as formal comment opportunities, there needs to be rules for this in the Public Involvement Plan. Can't

just wing it. You're taking formal comment tonight, and I really feel as if the agencies have essentially decided to wing it without any rules.

I also have a comment. Well, let me say it is great that people are on the phone, that people are getting their dinner, and enjoying this, and while the more technical issues are essential and sound sexy about leaving plutonium in the ground, and we certainly work hard to get people to those meetings, we won't have those meetings if we don't improve this Public Involvement Plan. That's why it's so important that all of you are on the phone tonight.

18. Paul Randall

Comment B: No, it was not accidental and I agree. This is Paul Randall again. I agree with Gerry's comment that this is a good start with Webinars. We have a long way to go. For instance, the business about voting is frequently implemented with Webinars. So the question will be posed to all of the participants and in a matter of a minute or so, you get the response. They say, hey, you've got a minute, respond please. So in that way it's like a show of hands, and that should certainly be implemented as should the video. Trivial, it's been done all the time.

19. Ken Niles, Oregon Department of Energy

Comment C: Thank you. This is Ken Niles. I'm with the Oregon Department of Energy. I want to thank everybody for calling in that has. Like others, I'm disappointed that there's a fairly small audience. I was hoping for a better participation. Several of us, as Paula mentioned, we've sent out to our e-mail list and I know there's been some media coverage of this. So we were hoping for a better participation of the webinar. That doesn't diminish at all the involvement of those of you who are on. So thank you very much.

Response to Webinar Feedback Comments: Thank you for participating in and supporting the use of webinars as one way to reach and engage individuals on Hanford issues. The Parties agree that webinars can be a more convenient way of informing and involving people when personal schedules or locations do not allow for in-person participation.

We will look for ways to improve interactive exchanges and increase visual content in future web-based meetings.

4.4 Proposed Deletions to the Plan

20. Jeanne Raymond, Corvallis, Oregon

Comment A: I question the reason for deleting information to make information more streamlined. No information should be deleted. Perhaps information could be filed differently. Deleting materials seems too easily open to abuse or obfuscation.

21. Jan Castle, Lake Oswego, Oregon

Comment A: Beyond the name change for the document, I find the proposed revisions to the Hanford Public Involvement Plan inadequate to the task of increasing public involvement. The streamlining you (the Tri-Party Agencies) have proposed has cut out a number of actions rather than adding any to improve communication.

Clarity of communication: Removing the glossary and expecting people to make a separate internet search for the meanings of acronyms creates a huge barrier to understanding the document. I fail to understand how this could possibly be construed as enhancing public communication.

Comment F: You have proposed to remove the language: "The Tri-Parties also conduct regularly scheduled meetings with public interest group representatives to discuss Hanford Site issues and concerns." This language should be retained. This benefits you as well as the public, since it gives you insight into what the public objections might be to your plans.

22. Nancy Kroening, Phoenix, Arizona

Comment F: The language from the 2002 CRP should be included. It reads, "The Tri-Parties also conduct regularly scheduled meetings with public interest group representatives to discuss Hanford Site issues and concerns."

23. Karin Engstrom, Seattle, Washington

Comment: I've worked on my comment over a period of time but felt it didn't have the substance I wanted to convey. It suddenly occurred to me what the problem was.

I've commented on Forest Service documents, plans, regulations, policies, etc. for years. On the regulations, I always found the existing regs and pasted them up next to the proposed regs to compare and see what differences there were. I've spent years doing this - so I know the history and background - I read all the Forest Plans in California and saw their progression and changes in how they put those documents together. I hiked many of the forests and was familiar (without being a scientist) with the environments and uses.

I don't have that knowledge or comfort when I comment on Hanford. But I do wish I'd had access to the public involvement document from 2000. I can't find it on the web. You know - when organizations do Bylaws - they cross out the sentences they are deleting and write in what they are proposing. Would that have been possible?

Response to Proposed Deletions to the Plan Comments: The Parties appreciate your feedback on information we are proposing to delete from the document. We discovered that since 2002, when the Plan was last revised, information was outdated (e.g., websites), more current information was available electronically, or some documents were no longer produced. It was that information that the

Parties proposed to delete from the Plan. The Parties are not proposing and did not delete any Hanford Administrative Record files.

The majority of information contained in the 2002 Community Relations Plan is unchanged in the 2012 Plan. However, the order and flow of information was rearranged to provide greater clarity and enhance readability. The Parties did not provide a redline-strikeout version of this document, because so much information was rearranged that such a document would have been difficult to read. (The 2002 Hanford TPA Public Involvement Community Relations document can be viewed at <http://www.hanford.gov/?page=89>.)

The draft Plan no longer contains the language: “The Tri-Parties also conduct regularly scheduled meetings with public interest group representatives to discuss Hanford Site issues and concerns.” This sentence was deleted, because these meetings have not occurred for several years. The increased use of email, conference calls, and in-person Hanford Advisory Board (HAB) meetings provide numerous opportunities for groups to interact with the Parties. (To learn more about the Hanford Advisory Board, see Section 4: Other Groups Involved at Hanford of the Plan.) Public interest groups, those represented on the HAB and those not represented, can and do contact the Parties to request meetings on Hanford Site issues. For more information on meeting with the Parties, contact the Hanford Cleanup Hotline at 1-800-321-2008 or email Hanford@ecy.wa.gov.

Acronyms referenced in the Plan are included and a more complete list of Hanford acronyms is available at <http://www.hanford.gov/c.cfm/tools/acronym.cfm>.

4.5 Proposed Additions to the Plan

24. Hanford Advisory Board Advice #251, submitted by Susan Leckband, Chair

Comment A: The Board advises that because the Plan is used by the TPA staff for public involvement efforts and is a guide for the public, the Board advises the agencies revise the Plan with both audiences in mind. The Board advises that a statement of purpose be added to the Plan as a preface to explain the characteristics and the goals of the document. The Board advises the Plan should more fully explain the importance of public involvement (Plan, page 8). The document should expand on and further explore the statement “when the public is involved in the decision-making process, better long-term decisions are made” with specific examples of how this is the case. The Board advises the TPA agencies include an appendix to, and references within the text of, the Plan that clearly describe the specific, legal requirements for public involvement at Hanford. The Board advises that the decision making requirements in Section 2 (‘Hanford Decision Making Process’) of the Plan be more carefully defined so that public involvement requirements and expectations are clear. The Board advises the agencies include a statement on page 18 of the Plan under the heading ‘email list’ that reflects an intention to increase the number of interested citizens on the TPA Hanford Listserv and regular mailing list.

Comment H: The Board advises and urges the TPA agencies update the Plan with Hanford-specific elements on implementing the U.S. DOE's Open Government Plan as it relates to the Hanford Public Involvement Plan (Board Advice 240).

25. Ken Niles, Oregon Department of Energy

Page 8, "Importance of Public Involvement," – we suggest adding the following reason for the importance of public involvement: "Cleanup decisions that are being made can have impacts on people and the environment for hundreds of years to come. It is appropriate for the public to help make these decisions." The existing bullets should also be revised and expanded on as mentioned in the beginning of this comment letter.

26. Ken Niles, Oregon Department of Energy

Comment F: The one comment that I would make, and I've had some conversations with Emy and Paula a little bit, to me the real guts of this Public Involvement Plan is the beginning of section one, page eight and nine and 10 and 11 for those of you who have it. It talks about the importance of public involvement, and there's some words in that that a lot of us have thrown out over the years in terms of public involvement is important because it makes, you know, better decisions and things like that, but I would hope that the next revision of this document would take that, not just a step further, but many steps further. I hope that there will be some real good discussion and thought internally to really make an effort in writing, really talk about what public involvement does mean and can mean at Hanford.

27. Liz Mattson, Hanford Challenge

Comment D: My name is Liz Mattson, and I work for Hanford Challenge, a nonprofit organization that focuses on Hanford cleanup. I'm also the vice chair of the Public Involvement and Communication Committee of the Hanford Advisory Board.

My comment is on the framing of a supportive public in the Hanford Public Involvement Plan. On page 8, the document references that public support for cleanup plays a vital role in decision-making. To me, public input plays a vital role, not support. Sometimes lack of support is what improves cleanup decisions the most. The public's lack of support should have as much of an impact on decisions as the support for those decisions.

28. Russell Jim, Confederated Tribes and Bands of the Yakama Nation

Comment A: Suggested text additions for new or existing sections of the Public Involvement Plan for the United States Department of Energy Hanford Site:

Introduction: People have a fundamental desire to participate in decisions that affect their lives. Experience has shown time and again that decisions implemented without the involvement of those affected are likely to be ineffective, resisted, and rapidly overturned. Conversely, decisions that involve

the full range of people impacted are much more likely to achieve broad-based support and long-term success.

Statement of Purpose: Public participation is an integral part of the Department of Energy, EPA & Ecology's responsibilities under the regulatory statutes which govern Hanford Site cleanup. Their common goals are to 1) provide the public with timely information and meaningful opportunities for participation 2) identify the public's values, priorities, and concerns and incorporate them into the activities conducted and decisions made at the Hanford site. These goals will be met through a public participation program that includes: The early planning and development of a site-specific public participation plan; the provision of public notices; a site register; public meetings or hearings; and the participation of regional citizens' advisory committees.

What is community involvement?

A traditional and essential role for community involvement is the incorporation of community values and needs into decisions made at Hanford. In the end, designated officials (the U. S. Department of Energy and regulatory agencies [EPA & Ecology] must make decisions concerning Hanford. These decisions are often difficult because conflicting interests and values must be balanced. Sometimes these are decisions that the community - or a portion of the community - won't agree with. Community involvement allows the breadth of interests and values from across the community to be heard by the decision makers in order to make the best possible decisions overall. Community involvement also allows the people in the community to hold the decision makers accountable for hearing their concerns and carefully considering them - one way or the other - in the decisionmaking process.

Core Values:

US DOE's Hanford site's community involvement process is founded on the following core values:

Accessibility: US DOE management will be available, approachable, and open.

Accountability: US DOE management will be responsible for involving the community, stakeholders, and Tribes in decisions and for providing explanations for the rationale behind decisions.

Accuracy: US DOE management will provide timely, accurate information related to its activities.

Communication: US DOE management and staff will actively seek open, two-way exchange of information, knowledge, and perspectives between the Hanford Site, stakeholders, and the Tribes.

Decision making:

Decision making contributes to success in community involvement when the community understands what the decision is, how the decision fits within the overall Hanford Site operations, and how community input will affect the decision, and then sees tangible, specific results from its efforts. It is the Tri-Party Agencies [Ecology, EPA & US DOE] policy to ensure that the ideas, interests and concerns of its

stakeholders and Tribes are considered in program planning and decision-making processes that affects the community or the general public. This policy is intended to bring a broad range of viewpoints and values into program planning and decision making before decisions are imminent. This will enable informed decisions and build mutual understanding between the Tri Party Agencies, stakeholders and the Tribes. To affect this policy The Tri-Party Agencies [US DOE, EPA& Ecology's representative managers] will:

- Actively seek and consider early public input regarding Hanford decisions that affect the community (Stakeholders) and Tribes. The segment of the community or Tribes that will be most affected by decisions will be clearly identified.
- Inform the community in a timely manner of key upcoming decisions, progress on ongoing activities, emerging technologies, and opportunities for economic diversity which may impact the community.
- Provide opportunities for the public (Stakeholders) and Tribes to have input in an open, two-way exchange of information, knowledge and perspectives.
- Provide a public account of decisions made and responses to public input regarding these decisions and how a specific decision relates to other decisions.
- Provide reasonable access to relevant reports, records and documents and seek to provide nontechnical explanations on technical matters when requested by the public (Stakeholders) or the Tribes.
- Continually assess its performance in community involvement. The Hanford Advisory Board will be asked to formally assess the Hanford Site's community involvement performance each year.

Comment B: Additional bullets under Goals of Public Involvement

The Public Involvement process may include identifying and conferring with individuals, community groups, local governments, tribes, public agencies, or any other organizations that may have an interest in or knowledge of the facility.

- Whenever reasonable, the department shall consolidate public notice and opportunities for public comment under this chapter with public notice and comment requirements under other laws and regulations. (also mentioned on pg 9)
- Advise the public of known or potential risks to human health and the environment that could be avoided or reduced by providing information to the public.

Add a Section for Definitions:

- Responsiveness Summary: Each *Responsiveness Summary* shall identify the public participation activity conducted; describe the matters on which the public was consulted; summarize the public's views, significant comments, criticisms and suggestions; and set forth the agency's specific responses in terms of modifications of the proposed action or an explanation for

rejection of proposals made by the public. Responsiveness Summaries prepared by agencies receiving EPA financial assistance shall also include evaluations by the agency of the effectiveness of the public participation program.

- "Strive": Clearly define all instances when public involvement opportunities are beyond the legal requirements and may not always occur. Clearly define when public involvement opportunities are legally required and when they will occur.

29. Mark Loper, Heart of America Northwest

Comment E: So I'll just renew my call for a commitment to the plan. And then the, I don't have it with me, but the, the fact sheet that you passed out with Frequently Asked Questions about Hanford, I think that document should be an appendix in it or something like that. That document has exactly what I was looking for in the Plan. And I think if it's after the introduction or somewhere in the meat of the Plan between Page 8 and Page 12, that Frequently Asked Questions on Public Involvement answers, I think it's more important than the whole document that I've read.

30. Ken Niles, Oregon Department of Energy

Comment B: The page numbering is confusing in that it uses Roman Numerals and then switches mid-stream to a numeric numbering system.

Page vii, 2nd paragraph – we recommend deleting the first part of the paragraph that says many of the activities go beyond what is required by law. If the Tri-Parties truly are interested in the involvement of the public, you don't have to tout that you're exceeding your requirements.

Page 9, "Public Comment Periods," – at the end of the first paragraph we suggest inserting the following: "For more complex decisions, the comment period may be 60 or 90 days or even longer."

Page 9, "Public Comment Periods," 3rd paragraph – the text says that the electronic Administrative Record files are only available during working hours. That seems odd for electronic documents, available through a website, not to be available at all times. If in fact the electronic Administrative Record is available only during working hours, that should be changed to make it accessible at all hours.

Page 9, "Public Comment Periods," 5th paragraph – the text says that if there are delays in publishing a comment and response document, interested citizens may be notified by mail or e-mail. The language should be clarified to indicate what the interested citizens would be notified of – a delay, the reason for a delay, estimated schedule – whatever it might be.

Page 9-10, "Public Meetings," 1st paragraph – the text says that "innovative outreach techniques to involve the public" are used. I'm not familiar with any consistently "innovative" techniques that are used. Perhaps this could be explained.

Page 10-11, “Public Involvement Evaluation Process,” – these are mostly focused on public meetings, not a broader range of public involvement activities and products. They should be expanded to include those other activities and products.

Page 11, box at the bottom of the left-hand column – the text says the annual report is available on Ecology’s website. We went to the website, clicked on the tab for “public involvement” and could not find the report.

Section 4, “Other Groups Involved in Hanford” – should include a description of the Hanford Natural Resource Trustee Council.

Response to Proposed Additions to the Plan Comments: The Parties have considered the suggested clarifications and additions to the Plan and have incorporated several of them. The Parties added a Preface that states the purpose of the Plan and the layout of the document. The Frequently Asked Questions (FAQ) about Hanford Public Involvement that includes a section on legal requirements for public involvement was added as an appendix to the Plan. The figures and text in Section 2, which describes regulatory decision-making processes at Hanford, were updated and clarified. The Hanford Natural Resource Trustee Council was added to Other Groups Involved in Hanford (Section 4).

The Parties agree that the principles of accessibility, accountability, and communication are important. These principles were considered and are reflected throughout the Plan.

Individuals who comment electronically on any document currently receive TPA Listserv notices. Their names are officially added to the listserv unless they request to be removed. The Parties are continuously working to increase the number of people on this email list.

4.6 Proposed Updates to Figures in the Plan

31. Russell Jim, Confederated Tribes and Bands of the Yakama Nation

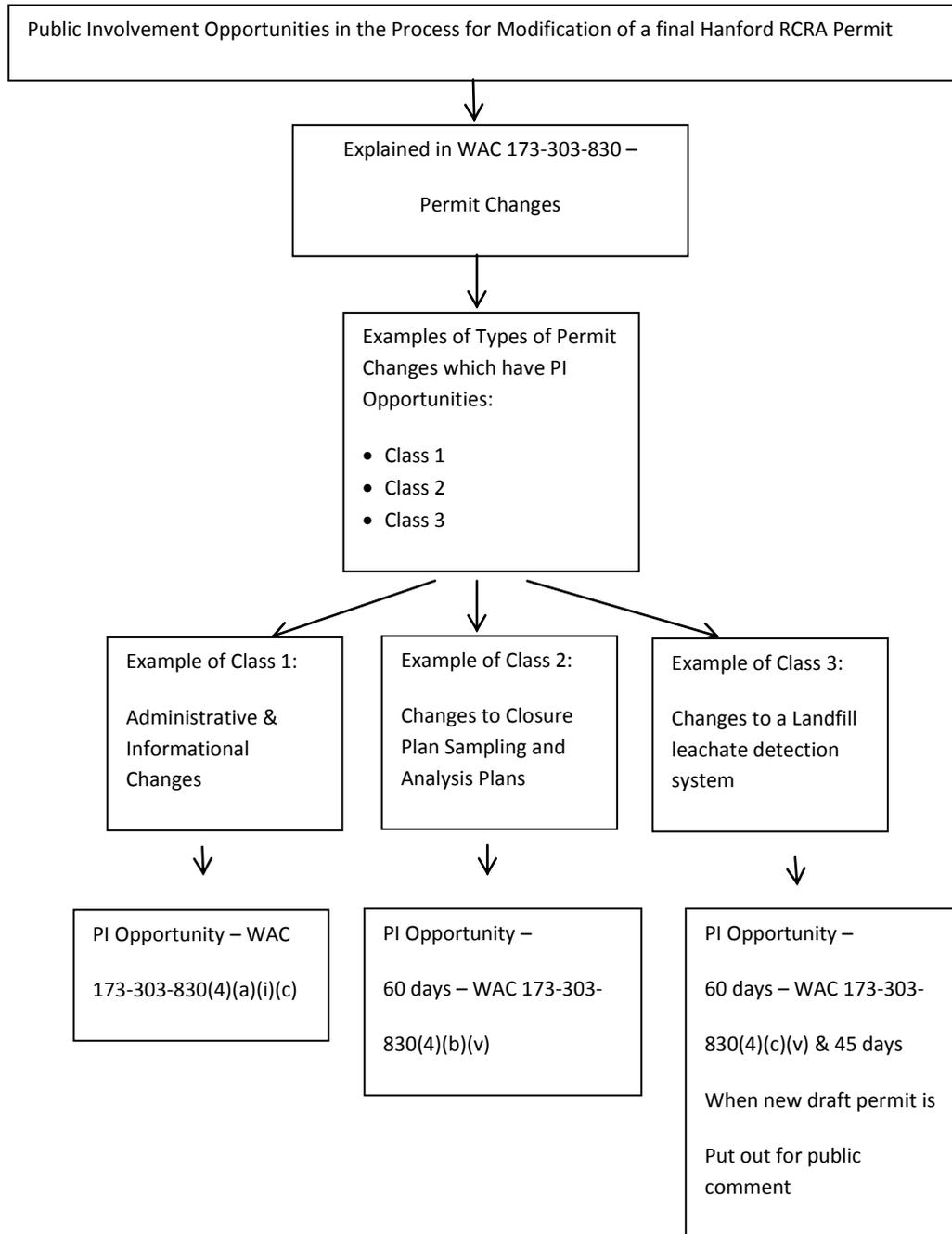
Comment C: Align Figures & Text to comply with WAC 173-303 regulatory requirements:

Figure 3: Remove EPA references. EPA only advises now that Ecology has complete authority under the Dangerous Waste regulations. Unclear what happens after Dispute Resolution for Part B Application; edit to reflect that after dispute resolution, Ecology will prepare a draft permit.

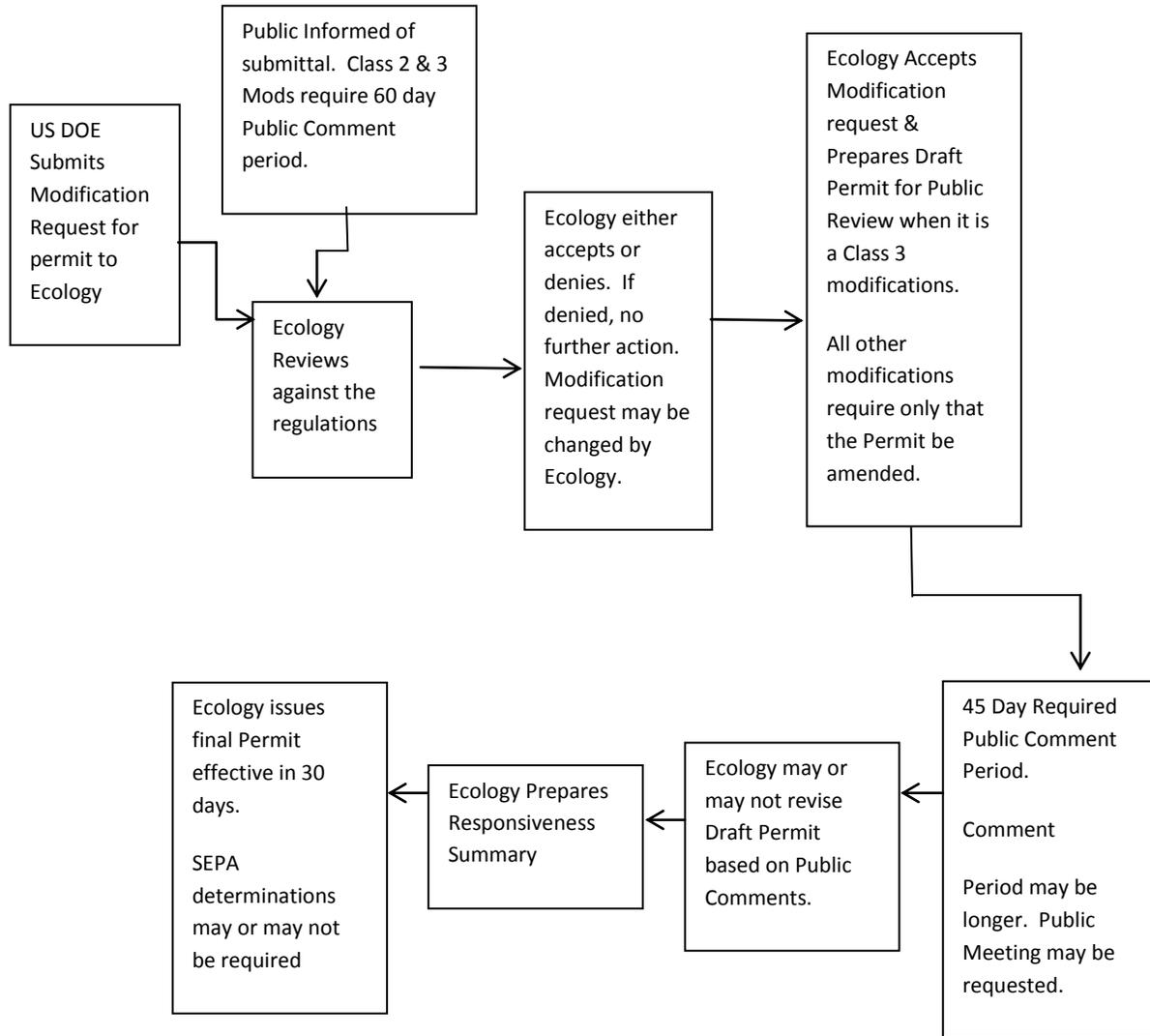
Figure 3: Modification processes of a final RCRA permit are not provided. Please include a new figure for Class 2 Modifications to a final RCRA permit which includes a box for 60 days public comment opportunity. Please include a new figure for Class 3 Modifications to a final RCRA permit which includes a box for 60 public comment opportunity & the second 45 days public comment period for a new draft permit.

- See attached suggested figures

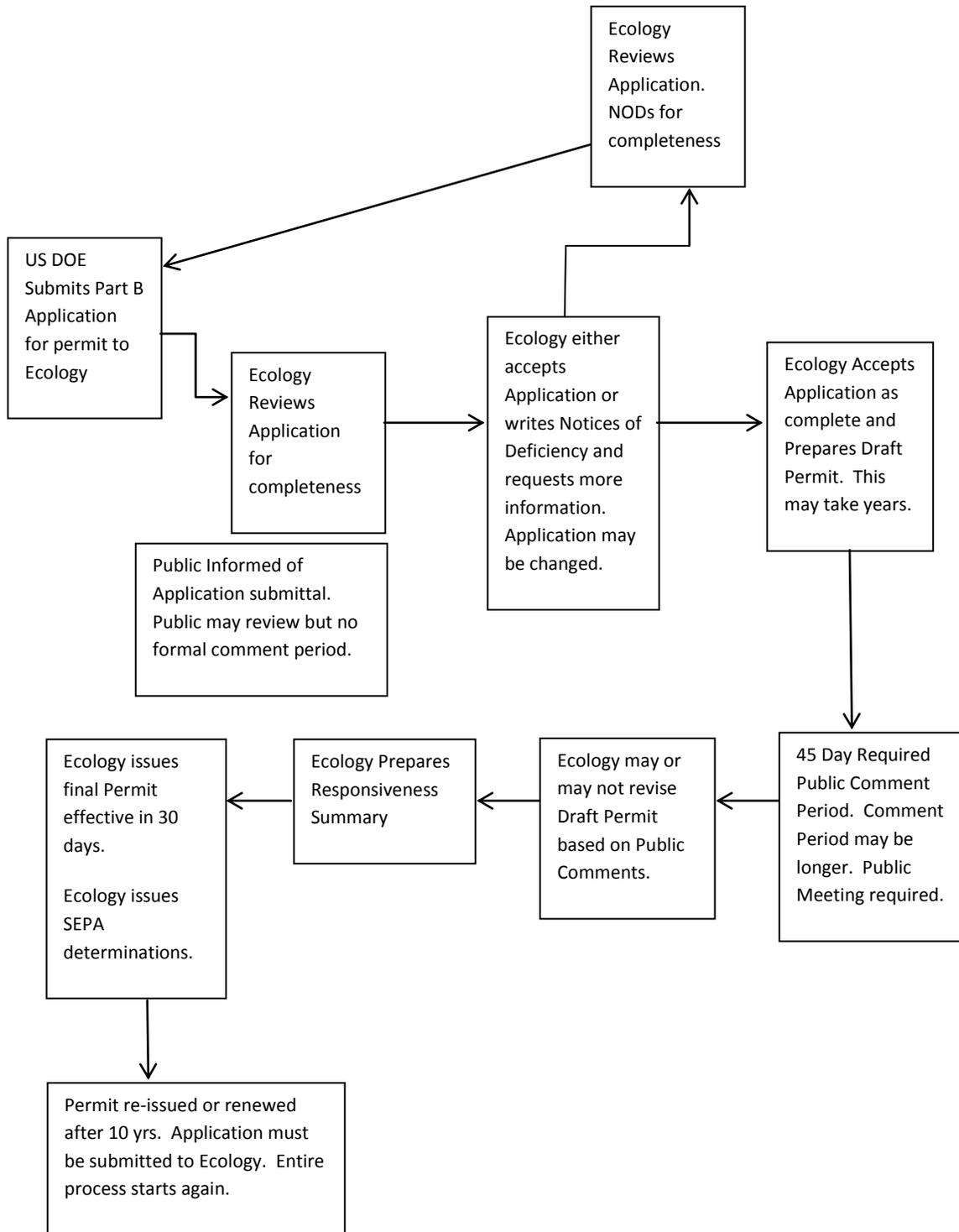
- Add additional text or edit text to address:
- Clarification of details of the modification process for Class 1,2, & 3 permit modifications
- Ecology's full authority to implement requirements of WAC 173-303.
- "Public Hearings" and differences between hearings and meetings.
- Correct text which states RCRA permitting decisions/modifications are made under the umbrella of the TPA. These are made under WAC 173-303-830 & - 840.
- Ecology's administrative record supporting draft permit, permit decisions, etc.



RCRA Permit Modification Process under WAC 173-303 Dangerous Waste Regulations applicable to the Hanford Site



RCRA Permitting Process under WAC 17-303 Dangerous Waste Regulations applicable to the Hanford Site



32. Hanford Advisory Board Advice #251, submitted by Susan Leckband, Chair

Comment F: The Board advises that the TPA agencies revise Figure 3 in the Plan (page 15), and add additional figures as necessary to align and coordinate the information with the Washington Dangerous Waste regulatory requirements.

Response to Proposed Updates to Figures in the Plan Comments: Thank you for your suggestions. The Parties updated the existing figures in the Plan to make them more accurate and easier to understand, but did not add any additional figures. We did, however, add some information to Section 2 on the different classes of permit modifications and explain the differences between “meetings” and “hearings” in the Frequently Asked Questions found in Appendix A of the Plan.

4.7 Public Meetings

4.7.1 Meeting Locations, Requests, Frequency

33. Bill Johns

Comment B: Another thing that I have is Seattle’s always one of the meeting places, no matter what happens. And Spokane is downwind, Tri-Cities is in the middle of it, Portland and the towns along the Columbia are downstream. What, what horse does Seattle have in this race? I mean, I don’t, I don’t understand why they’re always in it, other than some of the things I see, the comments that if you have 20 people, then you go to that. Well, that’s not a good way, I don’t think, to look for participation from, from the whole area that’s affected. I mean, I don’t know what scenario Seattle would be affected by what happens at Hanford other than getting electricity from Energy Northwest.

Comment D: I’m not part of Heart of America. I was not contacted with a survey. So surveys that special interest groups may give, unless you see all the detailed questions and know exactly who it came from, et cetera, can be slanted. I’m not saying that it is. But it’s the same with meeting downtown at that, at that building. It’s pretty much just the environmental group. I would feel even more intimidated, although, I’ve been to bike meetings there. But then I’m not the onion in the petunia patch.

34. Bob Apple, Spokane City Council Member

Comment A: Good. Mr. Johns, very, very good points. He’s probably right, we should use the Community Centers for meetings. Those are less – we have those around here. We have three community buildings in the city, plus City Hall, and they probably would be – and you’re right about citizens feeling browbeaten almost when they come to speak.

We have had really for at least a year now a Council president who has raised the ire of the entire community for the way he’s treated citizens who have come down to testify. And so it has really put people off. I really believe that. We haven’t had that problem with the County. We haven’t had that

with the Valley City. As much as we try to, you know, calm this guy, get this guy into line, it just hasn't worked. So he's been very detrimental to the public testimony, to the hearings process as a whole, so –

You know, and I have to take some blame in that, because I haven't been able to get him in line. But he's supposed to be in charge. So he's pointed that out to me numerous times. So we don't have a lot of say about that.

35. Spokane City Council, Spokane, Washington

Comment A: The City formally urges the Tri-Party Agreement agencies to commit to holding public meetings in Spokane on key cleanup decisions for Hanford, and to have at least one annual meeting for public feedback and discussion of public concerns as well as to undertake other efforts to improve notice and involvement for Spokane's residents;

36. Gerald Pollet, Heart of America Northwest

Comment K: Well, Bill raised an interesting point. Although, I know we've been on opposite sides of many a hearing. But you're very right that Spokane is the most affected downwind community in event of a major accident. So while I would say there's good reasons for having meetings in Seattle, we've been advocating that there needs to be at least one meeting a year, and on major decisions meetings in Spokane.

And it shouldn't be a popularity contest. It shouldn't be which city will have more people come, because Spokane is affected. As we see tonight, fewer people may come to meetings in Spokane. Spokane also has a smaller population to draw from. So we, we can't allow it to be a popularity contest or whether or not we choose not to have meetings in Spokane. And that's what I want to congratulate the City Council for kind of passing this Resolution recognizing that and the unique role Spokane has.

37. Linda Greene, Spokane, Washington

Comment A: I believe that the Public Involvement Plan must take into consideration the rights of the public to know and understand the decisions which are being considered by the USDOE and other governmental agencies. This would require public meetings in cities throughout the region which are affected due to their proximity to Hanford. Spokane is one such city, and its City Council has passed a resolution that annual public meetings be held in Spokane regarding Hanford cleanup. Other cities whose citizens have shown interest should have public hearings available to them, also. The plan should define what interest is necessary to require future meetings (such as 15-20 people in attendance.)

38. Hanford Advisory Board Advice #251, submitted by Susan Leckband, Chair

Comment E: The Board advises the TPA agencies that it is important to hold public meetings in diverse locations in order to reach an expanded public. This commitment to hold public meetings in diverse locations should be clarified in the Plan. This would ensure that the public in key locales which have had

few or no meetings will have the opportunity for meetings in the future. Furthermore, language identifying how the public may request a public meeting, including specific contacts, should be included.

39. Dan Serres, Columbia Riverkeeper Conservation Director

Comment C:

- The U.S. DOE should commit to holding regular meetings throughout the region about important documents. For example, U.S. DOE did not hold its own public hearings about upcoming decisions and public involvement in the Gorge or Portland. Going forward, the U.S. DOE should hold hearings throughout the region – including in Portland/Vancouver, Hood River/White Salmon, and the Tri-Cities about key decisions. Most importantly, when the U.S. DOE is planning to issue final Records of Decision (RODs), the public should have an opportunity to comment in a public hearing.
- The Plan remains vague about the threshold for which a public hearing is warranted.

Comment F: Thank you in advance for considering Columbia Riverkeeper's comments on Hanford's Public Involvement Plan. We strongly urge USDOE and the other Tri-Party agencies to hold public meetings throughout the region for all final decisions, such as the PW 1,3,6 & CW-5 ROD and upcoming River Corridor plans and RODs. If the Tri-Party agencies have any questions or would like to discuss these comments, please contact Columbia Riverkeeper at dan@columbiariverkeeper.org or (503) 890-2441 to arrange a meeting.

40. Eric Adman, Kenmore, Washington

Comment C: The Plan must include a specific process the public can rely on to request public meetings, guarantee meetings will be held in communities when a threshold of interest is shown, and ensure meetings are held at least annually in key cities.

41. John Wood, Hood River, Oregon

Comment D: The Plan must include a specific process the public can rely on in requesting public meetings; and, guarantee meetings will be held in communities when a threshold of interest is shown, e.g., 20 people will likely attend a meeting; and, ensure meetings are held at least annually in key cities.

42. Nancy Kroening, Phoenix, Arizona

Comment B: The public should be able to request special meetings as needed. A process should be set up for that and should not be too difficult. There is a lot of effort in meetings, so this should not be a problem as not too many will be asked. However, now and then, the public has a right and responsibility to call for more information on difficult issues. Cleanup plans need to have an annual state of the cleanup factor in which the public can participate.

43. Jan Castle, Lake Oswego, Oregon

Comment D: Meeting schedules: Meetings should be held routinely in locales where a threshold of interest is shown (e.g. 20 likely attendees). Public attendance will increase with regular meetings.

44. Gerald Pollet, Heart of America Northwest, Seattle, Washington

Comment A: If the request by several citizen groups and members of the public to have public meetings on the Public Involvement Plan in Portland and Hood River was not honored then this plan is clearly broken when it comes to the commitment necessary to honor public requests for public meetings. And this plan needs to have a very clear guarantee that when a significant number of people or groups representing them and are committing to turn people out as for public meetings, there will be public meetings.

It is already clear to us that given the fact that you have a region-wide Webinar and only 16 people participating, and I'm not sure how many of those are truly public, that replacing meetings is not the way to go. We need to have a very clear statement in the Public Involvement Plan, as we have in the state rules for the state cleanup program, that if 10 or more people or organizations representing them asks for public meetings, there will be public meetings.

In this case, the region-wide effort might be reasonable to make that if there is a commitment that 20 people will be at the public meeting that you will honor that request and hold it. While we respect tremendously the role of the state of Oregon, it is one important input that in the fact that Oregon didn't feel meetings were necessary on this plan, it is not relevant to the fact that many of your public and at least three organizations asked for public meetings on this plan in Oregon and it was not honored. And it just illustrates the need to have a very clear requirement in the plan.

Comment E: First off, for the record, I just would like the comments – not just the slides but the full comments that Mark Loper and I projected at the beginning presentation to be part of our official comments.

Secondly, we want to extend our thanks and appreciation to the agencies for extending the comment period on this plan until December 15th since Heart of America Northwest is putting on public meetings in Portland and Hood River on the 30th and 1st. Since the agencies declined to do public meetings there, we will be doing public meetings and workshops to get the same type of comments and discussion that the agencies should be holding but aren't in Portland and Hood River.

Unfortunately, that will now be one of those financial struggles because the Department of Ecology and the Department of Energy have been unwilling to put forward the funding that they had – the State had previously promised and is unwilling to ask the energy department to step up and fund as it had in past years for public participation grants.

Comment L: So how do we incorporate that into the Public Involvement Plan? There should be clear criteria that says here's an affected community and the second largest community in the state with downwind major population sector affected by the river, here's the criteria for why we have meetings in Spokane and our commitment to hold them.

Comment N: And secondly, they're part of the criteria for when you hold the public meeting to ask does this potentially affect downwind communities in the event of an accident or release. In which case, come to the people in Spokane and ask them if they want to have a public meeting. That's the criteria we'd like to see for a downwind community.

And I'd also like to say it's not just Spokane. I am unaware of the Tri-Party agencies ever holding a meeting in Walla Walla, except for when we organized them. Walla Walla is totally the next downwind community. And the same criteria should apply. And the same questions should be asked. Occasionally we get people to come from Walla Walla over to Richland for public meetings. But that is a long drive, 45 to 50 miles each direction. And it's too much to ask. And there are people there concerned and interested enough to come to a public meeting once or twice a year. And every other year, at least, in Walla Walla.

45. Lois Duvall, Lake Oswego, Oregon and Faith Ruffing, Portland, Oregon

Comment A: We are writing with regard to the Hanford Tri Party: USDOE; EPA; Washington State Department of Ecology Public Involvement Plan requesting comments by Dec. 15, 2011. We have attended a meeting sponsored by The Heart of America Northwest wherein they discussed their comments on the plan. We are writing in support of the recommendations made by this organization and urge you to incorporate them into your plan.

46. Manita Holtrop

Comment D: I'm Manita Holtrop. I want to back up everything you said. I think that there should be a requirement in the Public Involvement Plan that there are quarterly meetings with members of the public. And actually, what I'd like to see is that the Tri-Parties are not just held accountable to the public but actually action plans come out of sitting in a meeting, hashing out a plan with the public, with members of the public. So there's the Tri-Parties, and then there's the public group that creates the plan together.

47. Valerie Pacino

Comment B: And while social media is probably a boom in a lot of ways, it has serious limitations. Listservs and Facebook and Twitter with its 169 characters doesn't allow for a lot of nuance or depth. And I think that the only opportunity for that sort of thing to come out is in public forums where we can have dialogues and comment periods.

So I would recommend strongly that you increase the number of public meetings and maintain the funding to the citizen watchdog groups.

Response to Meeting Locations, Requests, and Frequency Comments: The Parties agree on the need to better define the process to request a public meeting or hearing. That process is explained in the Frequently Asked Questions found in Appendix A of the Plan.

The Tri-Party Agreement (Chapter 10.0 Community Relations/Public Involvement) states that public meetings on Hanford decision documents will be scheduled on an as-needed basis. This “as-needed basis” is assessed through interactions between the TPA agencies and stakeholders, interested members of the public, the HAB, and the State of Oregon. A Memorandum of Understanding (MOU) between DOE and the State of Oregon outlines how the agencies work together on Hanford-related public involvement activities held in Oregon. This MOU can be viewed at <http://www5.hanford.gov/arpir/?content=findpage&AKey=1104080335>. Washington and Oregon also have a separate Memorandum of Agreement that gives the Oregon Department of Energy the opportunity to review Ecology’s correspondence with DOE, consult with Washington State regarding changes and progress at Hanford, and provide input before final decisions are made.

Input received through consultations with Tribal Nations is also considered. The Parties maintain a government-to-government relationship with the Confederated Tribes of the Umatilla Indian Reservation, Confederated Tribes and Bands of the Yakama Nation, and the Nez Perce Tribe. We meet regularly with tribal representatives and offer consultation on actions, decisions, and program implementation that may affect the tribes. The Parties also consult with the Wanapum Tribal Community that lives adjacent to the Hanford Site and with the Confederated Tribes of the Colville Reservation on cultural resource issues.

Other factors that are considered when determining the need for a public meeting are:

- **Public interest in the topic as expressed by public interest groups and other stakeholders;**
- **The number of public meetings that have been held in the past year or future meetings considered for that location;**
- **Other public involvement activities, such as workshops or open houses, scheduled on a given decision or issue.**

The Parties often receive input from stakeholders located downwind and downriver from the Hanford Site, such as those located in Spokane and Hood River, stating their interest in having public involvement activities conducted in their area. We also receive similar input from stakeholders not immediately located downwind or downriver from Hanford, such as Seattle. While proximity to Hanford is one factor that may be considered, it is not a deciding factor for where to hold public meetings since stakeholders across the region have demonstrated significant interest in Hanford cleanup issues.

Once a city is selected, the Parties work with the organizations and interest groups in that area to select a specific meeting location. We take into consideration factors such as access to public

transportation and parking, facility availability and resource constraints. Since the Parties weigh a number of factors in determining the location and number of public meetings to hold on a given cleanup decision or issue, we do not believe a public meeting requirement tied to a specific number of requests (e.g., 10 or 20 requests) is an effective or balanced way to base the number of public meetings or selection of locations. It is important for the Parties to first gauge the level of public interest in a cleanup issue before deciding to have a public meeting on that issue.

The Parties conduct Quarterly Public Involvement Planning meetings where agency representatives discuss upcoming public involvement activities and solicit feedback from stakeholders and members of the public on issues of interest. These meetings are advertised through Hanford Listserv notices, and call-in numbers are provided for those who cannot attend in person. If you would like to participate in these TPA quarterly meetings, please join the listserv at <http://listserv.wa.gov/> to be notified of upcoming meetings and other Hanford public involvement activities.

We continuously work to balance our public involvement commitment with resources – both time and money. In this time of constrained budgets, the Parties must work with the cleanup projects and the stakeholders to determine how and where to spend limited public involvement dollars.

Please see page 59 of this document for a response to public involvement grants.

4.7.2 Effective Public Meetings

48. Shannon Cram

Comment : When we consider methods for improving public involvement, increasing the number of public meetings and diversifying meeting locations (as suggested at the HAB meeting) are certainly good ideas, however, even more important is making those meetings more effective and meaningful for members of the public. One comment you hear over and over is that the public doesn't feel that their advice has an impact—they don't feel like a meaningful part of the process. I believe the format of public meetings plays a part in generating that feeling of separation from the decision-making process.

There is a noticeable separation between the administration and the citizenry in public meetings—even in the spatial set up of the room, where agencies are behind a big long table and members of the public come up and speak at the microphone.

As a student studying Hanford for the past seven years, what I've found is that I have the most meaningful conversations and I learn the most about Hanford, when I'm sitting around a table with a small number of people or when having one on one interactions with people well-informed about Hanford. I would like to suggest that you re-format public meetings so that they facilitate these kind of two-way conversations rather than continually relying upon agency-presentation-and-public-response meeting formats. I would like to see a round table discussion format for public meetings, where members of the public sit at the same small tables as agency staff in order to facilitate meaningful back and forth—two way communication, actively building relationships between citizens and administrators.

It is those individual relationships that keep people involved at Hanford and that make people feel heard. The way we do public meetings, the way that the citizenry and the administration interact at public meetings needs to change if we are going to improve public involvement.

49. Jan Castle, Lake Oswego, Oregon

Comment H: Meeting format: I much prefer the facilitated, “round-table” type formats to formal hearings, which some people find very intimidating. I appreciate being able to ask questions of agency representatives, and would like to see each agency make their own presentation so I can gauge if there are differences of opinion. I also want time allotted for alternative viewpoints from Heart of America NW and the State of Oregon. The facilitators you’ve used have been excellent.

50. Nancy Kroening, Phoenix, Arizona

Comment E: People who attend meetings should be given an opportunity to comment for at least 8 minutes. And they should be able to ask questions and get answers heard by other attendees.

51. Bill Johns

Comment A: I think one of the problems with the meetings that people come to like me, I mean, I’m usually the onion in the petunia patch at meetings. People have been pushed ahead of me, when I’ve signed up on the sheet, once the rules were set. I’ve been sworn at, talked behind my back. The time limits aren’t necessarily kept for some people, the people that you react with all the time. It can be intimidating for somebody who’s on the other side.

I mean, there’s a lot of people out there, the public, I think I represent more of the public probably than some of your interest groups. Because the public is sitting here working, can’t come to the meetings. The public that’s generally in tune with what’s going on down there is satisfied with it. Wants it done efficiently. Doesn’t want all the dirt dug out of the, the entire area and put in another place that we’re gonna have to deal with at another time.

It’s intimidating to be on the other side. Not in this meeting, but in some of the other meetings it’s like, you know, the roomful and me. I’m against – I’ve had public meetings, myself. I’m against looking at some of the comments coming up, like a straw vote. Like if one group can bring a bunch of people to it, you have a straw vote. I would hate things down there to be decided by, on a straw vote at a meeting in the middle of Spokane in a snowstorm or when Gonzaga’s playing or something. You know what I mean. Public meetings are fine. But it’s not the public necessarily.

Response to Effective Public Meetings Comments: The Parties agree. Public meetings should provide opportunities for all individuals and points of view to be expressed and heard. A goal of Informational forums is to foster greater two-way dialogue between agency representatives and members of the public. At meetings where the purpose is for the public to comment on a given cleanup decision, the goal is to ensure everyone who wants to comment (verbally or in writing) has that opportunity. In

that situation, it is more difficult for two-way dialogue to occur. In some instances, the Parties hold open houses prior to public comment meetings as a way to engage members of the public with decision makers and provide another opportunity for their values to be shared.

We heard from the public on their preference for round tables to promote a greater sense of openness and dialogue. We have increased the use (where they are available) of round tables at all meetings, including formal public comment meetings and plan to do so in the future. In addition, based on public and stakeholder feedback, the Parties are looking for ways to limit the amount of time spent on agency presentations, such as providing a single presentation rather than separate ones.

The amount of time provided to each public commenter is in part determined by the time allocated to public comments and the number of individuals who would like to provide formal verbal public comment (time/number of commenters). Again, our goal is that everyone who wants to give public comment can. Often, there is sufficient time so that commenters are provided a second (and sometimes a third) opportunity to comment verbally.

4.7.3 Public Meetings Held on the Plan

52. Nancy Stevens

Comment: Request that the agencies schedule a public meeting for the CRP/PIP comment period in Portland. We need to get the media involved and there's an article in the Oregonian today "dealing with this stuff."

53. Ken Niles, Oregon Department of Energy

Comment D: As mentioned, I had earlier indicated that I didn't think that public meetings in Oregon were necessary for this topic. I was hoping that the Webinar would provide a good opportunity for people. We have heard repeatedly from folks both in Portland and Hood River that at times they're a little weary with coming out to public meetings. We thought it might be an opportunity to try something a little different, make it a little easier on folks. So we'll certainly have to reassess the success of that.

54. Desiree Ashley, Yakima County

Comment: Hello, I am interested in attending the public meeting on the Hanford Public Involvement Plan. I am a resident of Yakima County on the border of Benton county. I am not able to go to Seattle or to Spokane to attend a public meeting concerning Hanford Public Involvement Plan. I was also not able to take part in the webinar.

Why is there no public meeting scheduled in the area immediately surrounding Hanford for local people to learn more about the proposed changes to the Hanford Public Involvement Plan to attend?

55. Liz Mattson, Hanford Challenge

Comment B: Then I also agree that having cleanup decisions have a stronger pull, and when we are prioritizing meetings and giving a big pull for members of the public to come out to the meetings, those are the kind of meetings I want people to get contacts on. What is the decision being made and how can we make a difference, and it is concerning given the PW-1-3-6 and CW-5 record of decision following a great deal of public comment asking for more plutonium to be removed and having that not be the case.

One idea for how you might be able to generate more turn out in the future at a meeting like that is even just addressing that as an issue or just bring it into the conversation, as an example. I think that's a scintillating topic, and I think talking about it will help in the future and just finding ways to rebuild confidence that being a participant in Hanford cleanup does actually have an impact or can have an impact.

Response to Public Meetings Held on the Plan Comments: In determining the public involvement activities on proposed changes to the Plan, the Parties sent an electronic Hanford Listserv notice on September 15, 2011. That notice asked stakeholders to participate on a September 21 stakeholder conference call and provide informal input on possible locations and dates for public meetings. Based on that input, along with input from the Oregon Department of Energy, informal input from the HAB, the number and locations of public meetings held that year (fiscal year (FY) 2011), and required public forums and resources on cleanup decisions in the coming months, the Parties decided to hold two in-person public meetings and one webinar on the proposed changes to the Plan.

The in-person public meetings were held in Seattle and Spokane. The webinar provided members of the public, who could not travel to those locations, the opportunity to provide input directly to the Parties. The decision not to hold public meetings in Oregon was based in part on input from the Oregon Department of Energy and other stakeholders who felt their constituencies would not be as interested in the draft Plan compared to other Hanford cleanup decisions. (Please see the Response to Meeting Locations and Frequency on pages 29 and 30 of this document for more information on how the Parties gauge the level of public interest in an issue.)

4.8 Communication and Meeting Materials

56. Valerie Pacino

Comment A: My name is Valerie Pacino, and I am a master's of public health student at the University of Washington.

If you genuinely want to or if we generally want to improve public involvement, cutting funding and forums for public involvement seems like a strange way to do that. This is a subject that doesn't lend itself well, terribly well, to being understood easily or quickly. And it's very easy for the language – or

for the layperson to feel bullied by a lot of the information that comes out from the agencies. I'm fairly adept at understanding this sort of thing, and I feel bludgeoned by the technical details and the acronyms.

57. Linda Greene, Spokane, Washington

Comment F: I keep informed by the communications from Heart of America Northwest. They do a good job in presenting material in an understandable, straight-forward way. As a general rule government publications are verbose and complex and make it virtually impossible to understand the ramifications of whatever topic they are addressing.

58. Gordon Smith, Seattle, Washington

Comment B: Model DOE & EPA written messages to the public after the Citizen Group Language. DOE & EPA language has improved some but there is a long way to go.

59. Roxy Giddings

Comment B: Anyhow, the materials presented to the public concerning this Hanford stirring process Tri-Party Agreement should have a logo on the front to alert us to the need for public notice, so that when e-mails come out they all come out with the same logo on them: Now, don't delete this one.

If we really want public input, maybe the Tri-Party members should get together and publish documents more like the ones that the citizens groups put out or more like what comes out in the newspaper, which tells us almost every time there will be something about the health of the environment.

60. Nancy Kroening, Phoenix, Arizona

Comment C: When a proposal is submitted there is background information that goes with it. Often this appears to be some sort of mumbo-jumbo which needs filling in with facts and locations. The facts and locations are what we want! Like with the plan to dig down to 15 feet and no further, etc. If the agency people cannot do the job of making the announcements clear and understandable, perhaps an independent specialist should be hired.

61. Karin Engstrom, Seattle, Washington

Comment B: I hope this brief statement and the others listed will expand and develop into definitive plans.

Here are my own concerns and impressions as a member of the involved public:

1. When I've read or attended the public meetings about the various toxic waste streams – where they are going – how they affect the ground water and river – what is being done to address this problem, I don't feel that you give a definitive overview of the connections. There are too many

separations. I tried to overlay the maps, but they are not the same. You probably need to show a 3-dimensional map of where each toxic substance is located and how it is in relationship to the others.

2. I think in terms of relationships. This area's ecosystems have been traumatized for a very long time. The residents of the Tri-Cities and down winders have been living with the consequences of Hanford's activities for 70 years. That's a long time. I believe that the human experience is as important a part of the "clean up" operation. I would like to hear and read more stories about their views before commenting on some of the decisions you propose for public input.

3. I feel information about the contractors is sparse.

As far as trying to communicate on the issues and decisions surrounding Hanford, I think you have been more responsive, in recent years. I have accessed the videos, your website, publications and am a member of Heart of America Northwest. I appreciate their clarification of the issues and would hope you'd take their suggestions to heart. I was glad that Heart of America took the initiative to expand the venues regarding public involvement and the plan.

62. Mike McCormick

Comment B: And, finally, I just want to say that I had seen the video that Emy and others had recently produced, and I thought that was a great start. I would like to see more of that. Again, I would like to see those both coming from the different Tri-Party Agreement, the three entities that make up the Tri-Party Agreement, as well as organizations that make up the Hanford Advisory Board.

Response to Communication and Meeting Materials Comments: Thank you for your feedback. Hanford is a complex environmental cleanup effort with several different components. Most documents and reports used to support a decision at Hanford are written with a strong scientific and technical basis and use numerous acronyms. When communicating with the public, the Parties try to simplify this technical language to make it easier for the average person to understand.

The Parties try to limit the technical wording and jargon in our communication materials— electronic and mail announcements, public service announcements, fact sheets, and public meeting presentations. As previously mentioned, we are experimenting with new tools such as videos and video streaming in an effort to make this information more understandable to the public. We appreciate your support for our efforts in this area.

We will continue to look for ways to better communicate information besides print material. We agree on the importance of providing a more holistic and integrated overview of Hanford cleanup activities.

Please see page 59 of this document for a response to public involvement grants.

4.9 Public Notices

4.9.1 Notice of Upcoming Activities

63. Linda Greene, Spokane, Washington

Comment B: Minimally 30 days' notice should be provided, so that members of the public can be educated about the topic. Due to the complexity of the decisions, I would suggest 60 days' notice as an ideal.

64. Mark Wahl, Langley, Washington

Comment A: There are basics that will insure good, not pseudo, Public Involvement by official agencies. Some of these are:

- Prompt (30 day notice) and clear notification--no hedging or "striving" statements about tardiness.
- Use an independent communications professional to keep track of this

Please give notice that includes the results of actions taken on all the comments submitted.

65. John Wood, Hood River, Oregon

Comment C: The Public Involvement Plan must be revised to ensure that minimum standards are met for providing you with notice (e.g., ensuring at least 30 days of notice so we can provide the public with Citizens' Guides or other mailings); when you have the right to a meeting and access to information; and, how meetings are organized (the Plan's commitments *must be legally binding*).

66. Nancy Kroening, Phoenix, Arizona

Comment A: I request that we, members of the public, be notified in plain language form, in a timely manner, and with as full information of proposed actions, progress on former plans, and changes in work orders as possible. All plans should meet SEPA, NEPA, and federal, state, and local regulations regarding notice.

67. Eric Adman, Kenmore, Washington

Comment A: I have the following comments on the Hanford Cleanup Public Involvement Plan:

The Public Involvement Plan must be revised to ensure that minimum standards are met for providing public notice. It should provide at least 30 days of notice, specify when the public has the right to a meeting and access to information, and specify how meetings are organized.

68. Ken Niles, Oregon Department of Energy

Page 9, "Public Notice," – we believe the Tri-Parties have made considerable progress in developing more interesting public notices. We urge you to continue that progress.

69. Russell Jim, Confederated Tribes and Bands of the Yakama Nation

Additional bullets under Public Notification Process:

- For public notices describing cleanup plans that use site-specific risk assessment or would restrict future site or resource use, the public notice shall specifically identify the restrictions and invite comments on these elements of the cleanup plan. This notice shall also include a statement indicating the availability of public participation grants and of the department's citizen technical advisor for providing technical assistance to citizens on site-specific risk assessment and other issues related to site remediation.

For sites where site-specific risk assessment is used, the department shall also evaluate public interest in the site, significant public concerns regarding future site use, and public values to be addressed through the public participation plan.

Response to Notice of Upcoming Activities Comments: The Parties conduct public involvement activities in accordance with legal requirements and direction [i.e., National Environmental Policy Act (NEPA), Resource Conservation and Recovery Act (RCRA), Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), and the TPA]. We also conduct public involvement activities beyond what is legally required such as State-of-the-Site meetings, topical workshops, and comment periods on non-regulatory documents. The Frequently Asked Questions, Appendix A of the Plan, contain information on public involvement legal requirements.

The TPA requires that the Parties provide 2-3 weeks prior notice for public meetings and 30-days notice prior to a public hearing. The Parties make every effort to provide the public with earlier notification (30 to 45 days) of upcoming Hanford public involvement activities whenever possible. Sometimes it is not possible to provide earlier notification. In those cases, notice is provided by the Parties as soon as definitive information is available.

The 30-day advance notice is meant to inform the public of an upcoming comment period or public forum. Fact sheets containing more in-depth information are mailed and provided electronically at the start of a public comment period or activity.

4.9.2 Language in Notices and Listserv

70. Jan Castle, Lake Oswego, Oregon

Comment B: All documents, and especially public announcements and notifications, should be written in language that can be easily understood by lay people. If your employees are too close to the work to translate language, you should hire a communications specialist to do it.

71. Manita Holtrop

Comment A: Hi, this is Manita Holtrop and I was going to talk about expanding the e-mail list because not just for meetings, but they sent out to only 725 people and a list of agency and contractor personnel doesn't seem to be adequate public involvement. There should be a link to the Listserv on the Public Involvement Plan. The Public Involvement Plan should ensure that the Tri-Party Agencies work with citizen groups in order to actually get their message out and not just rely on e-mail. And the e-mail should be written in layman's terms and not in techno-engineering speak.

I think that an independent professional should be contracted to make the announcement and notifications that are easily understood by the public. For example, not using names and types of operating units in the e-mails would be greatly helpful for helping the public to understand what's actually going on.

72. Mike McCormick

Comment A: Yes, thank you. Thank you for taking my comment. I would like to second the previous suggestions for serious expansion of e-mail and notification to the public. I would propose that you could probably go back about five years worth of public meetings and take e-mails from whoever put them down in that time period. I think that would be a reasonable place to start. I'm sure some of those are no longer any good, but that would be weeded out fairly quickly.

The second thing was that the use of public service announcements, I would think would be a standard, certainly for this particular aspect of Hanford and this project, but in terms of any public meetings would be a standard site. You would just go to it, and it sounds like this meeting was fairly short-notice. Hitting just the Tri-City Herald and the Seattle Weekly, Seattle Weekly is not known as one of the larger publications in Seattle. It seems somewhat weak to me.

In addition, you have numerous radio and television outlets in this region that can be approached, and you know, if you don't have your own in-house facilities for this, you have a lot of talented people in the area, including myself, that would be happy to help, perhaps the Hanford Advisory Board, regularly produce timely PSA's for upcoming meetings. So I think that would be a good use of energy to reach the citizens of Washington and Oregon State that are directly affected by these meetings.

73. Roxy Giddings

Comment A: I'm Roxy Giddings. I've been making comments for years, since, oh, sometime after 1954. I think notifications should let me know how the process will affect environmental health now and for the next hundred thousand years. I can't make a comment about the process unless I know how it's going to affect the health of the environment for the next hundred thousand years.

And I call this the stirring, the Hanford stirring process, where we stir things up, separate them out, put them in a more expensive container, put them through a more expensive process, and end up with a procedure that leaves a structure that will be so radioactive that no one will be able to get anywhere near it.

And it seems kind of like we're in that mode now. We have some things that no human being should ever be anywhere near. And so ten feet of soil? 50 feet of soil?

74. Gerald Pollet, Heart of America Northwest

Comment M: The second thing is looking at the notice section of the Public Involvement Plan. So when there's a decision, for instance, to extend the time period for which single shell tanks will hold wastes by 40 years, until the year 2040, the notice needs to say and commit that it's going to identify the potential impacts to downwind or down river communities.

And that's traditionally the definition of effective notice and public involvement. We've talked about it a lot. There was a commitment in prior plans the language of effective notice that informs people not just about the proposals, which is nice, this one does say it's going to inform people about the proposal, but how the proposal will affect public values and concerns. And that would include, for instance, if we keep wastes in tanks that these domes can collapse in whose integrity we are uncertain of for the next 30 to 40 years. These could have impact on everyone in Eastern Washington in the event of a serious earthquake, fire, other accident.

There are other facilities at Hanford that have the same type of potential impact. The storage facilities for the essentially, swimming pool, not for spent fuel, but the, which is an issue at Energy Northwest, but the swimming pool in which at Hanford has the highest concentration of, I believe, of radiation in the entire country. It's an ancient swimming pool that no one's going to claim is designed to withstand the earthquake that at least the Northwest Energy reactors would be able to withstand.

So when we make a decision about that, effective notice will be to tell the people, you know, say up front in the headline, this could affect downwind communities in the event of major earthquakes, and here are the choices. That's what effective notice is. And we'd like to see a comment in the Plan to effective notice.

75. Gerald Pollet, Heart of America Northwest

Comment B: I have another major issue and I would like the agencies to address this when they come out to the public, which is the interrelationship of this plan and why it doesn't address, after all these years of the advisory board and public urging and the state of Oregon I know has urged, that when the Energy Department issues major environmental impact statements that will affect the cleanup of Hanford, there should be clear commitment in this Public Involvement Plan that the notice of those hearings will go to everyone on the Hanford cleanup list, and the elements of this plan will be followed, including commitments from the links around the region.

Right now, for instance, when the Energy Department proposes to ship 12,000 shipments of extremely radioactive greater than Class C waste to Hanford, which would have a huge impact and undo everything we are trying to do with cleanup, and we have to fight like heck in order just to have one meeting in Portland, and no meetings were held in Washington State outside of Tri-Cities. That's inappropriate. And the notice was only sent at our urging to people on the cleanup list. Normally, it would affect. That's wrong. It needs to change. It needs to be addressed in this plan as an enforceable commitment.

Response to Language in Notices and Listserv Comments: We have made efforts to expand the number of recipients on the listserv. Individuals who comment electronically on any document are sent TPA Listserv notices. When the Parties speak to organizations, hold public meetings or workshops or do any outreach activities, we encourage individuals to sign up to receive electronic information on Hanford cleanup issues. This is an ongoing effort.

The Hanford workforce is a key Hanford stakeholder and makes up a large part of the public in the Tri-Cities (Richland, Pasco, and Kennewick). Many of those individuals receive information about Hanford at work and make up a significant portion of those listserv recipients.

Before a proposed cleanup action is considered for selection, it must be determined to be protective of human health and the environment. The impacts of natural disasters such as earthquakes or other catastrophic events are considered when risks are evaluated for a proposed cleanup action. Should an immediate threat to human health and the environment exist, the Parties do take action to address it. Figure 5 in of the Plan was updated to reflect the need for action when immediate risks exist. In addition, any restrictions on land use after cleanup are required to be provided in public notices.

There are cases when the Parties are not directly involved with a public hearing or public comment period on a national decision that could impact Hanford, such as considering Hanford for a regional waste disposal site. In those cases, the Parties are not the decision makers and not involved in planning or participating in associated public involvement activities. However, the Parties will continue to post listserv announcements of these public involvement activities as information becomes available.

4.9.3 Advertisement of Meetings

76. Kristina Mageau, Olympia, Washington

Comment B: Although I heard about this meeting from Seattle Weekly, I read the Stranger, Real Change, & Olympia Power & Light much more frequently. I suggest advertising with them, as well. The Stranger is especially popular amongst the youth.

77. Jim Kelley

Comment B: Also, I hope there are no Seattle Weekly reporters here, because I'm about to compare them unfavorably to their competition, The Stranger. But I would say that if you want to get more involvement of people who actually come out and do things on a political level in Seattle, I would suggest advertising in The Stranger at least as well as the Weekly. Or if you have to choose between the two, I would definitely choose The Stranger.

Notification: The agencies' Listserv should be expanded so that they can send notification of meetings to a much wider segment of the public than they do now.

Response to Advertisement of Meetings Comments: *Thank you for your input. The Parties will consider using different publications when publishing future ads.*

4.10 Public Involvement Evaluation

4.10.1 Annual Evaluation and Surveys

78. Eric Adman, Kenmore, Washington

Comment D: The Plan must include an annual evaluation of Hanford public involvement based on surveys of people on the notice list, not just evaluations turned in at meetings or events. If people aren't attending meetings or events, we need to know if the notices are ineffective or if the meeting locations are inappropriate, etc.

79. Mark Wahl, Langley, Washington

Comment C:

- Annual evaluations mailed to those on notification list to monitor effectiveness of noticing

80. Linda Greene, Spokane, Washington

Comment D: An annual evaluation by all people on the notice list should be a part of the Plan.

81. John Wood, Hood River, Oregon

Comment E: The Plan must include an annual evaluation of Hanford public involvement based on surveys of people on the notice list, not just evaluations turned in at meetings or events – after all, if people aren't attending meetings or events, we need to know if the notices are ineffective or if the meeting locations are inappropriate, etc...

82. Jan Castle, Lake Oswego, Oregon

Comment G: Evaluation: You can't know if your Public Involvement Plan is working or not unless you have periodic evaluations of the plan. I suggest annual surveys of the people on your (expanded) Listserv to gauge the effectiveness of your outreach.

83. Hanford Advisory Board Advice #251, submitted by Susan Leckband, Chair

Comment B: The Board advises the agencies conduct an annual evaluation of public involvement, using surveys in addition to event evaluation forms distributed at public meetings as referenced on page 11 of the Plan. The Board advises that the public involvement goals referenced on page 8 of the Plan be measured in conjunction with the evaluation identified in the preceding advice point.

Response to Annual Evaluation and Surveys Comments: The Parties agree. An annual survey will be used in addition to those distributed at public involvement activities. More information on surveys can be found in the Public Involvement Evaluation Process section of the Plan. Efforts to expand listserv recipients are discussed on page 40 of this document.

4.10.2 Goals and Metrics for Evaluation

84. Linda Greene, Spokane, Washington

Comment E: The Plan should have expected and hoped for involvement of a large number of concerned citizens. Those expectations should be stated in the Plan. The number of people who come to the hearings and those that comment through other means should be counted, so that the agency can see whether they have met the goal of citizen involvement. These numbers should be made public and if the goals are not met, this would be a motivation to the agency for further concentration on involving as many people as possible in the process.

85. Manita Holtrop

Comment B: The PIP should have goals and measurements, goals for adequate public involvement. Citizen groups should not have to be responsible for this type of thing, and I think that if there's a lack of public involvement it's not because the public isn't interested. It's because it lacks adequate notice and lack of trust in the agencies involved.

86. John Wood, Hood River, Oregon

Comment B: I also believe that the DOE should be required to increase to certain set levels, the number of non-DOE or federally employed or contracted or compensated citizens of Washington and Oregon attending these meetings so that common folks can see whether the DOE has public health even

remotely in mind when decisions are made "on our behalf". The remainder of this letter is important, so read it.

Response to Goals and Metrics for Evaluation Comments: The Parties track the number of people who attend Hanford public meetings and hearings. While we would like large turnouts for every Hanford public involvement activity, this does not always occur. However, the number of people attending a public meeting or workshop is only one measure of adequate or effective public involvement. Meaningful dialogue can occur when even a small number of people attend a meeting.

4.11 Annual Updated Goals and Action Plan

87. Mark Wahl, Langley, Washington

Comment B:

- Use actual monitoring and measurements to decide if standards, goals, updated annually, are being met.

88. Eric Adman, Kenmore, Washington

Comment E: The Plan should include an annually updated set of goals and action plan for the coming year. The Plan must have specific measurements for their new goals for public involvement. Without measurements, goals are meaningless.

89. Hanford Advisory Board Advice #251, submitted by Susan Leckband, Chair

Comment C: The Board advises the agencies develop an annual updated public involvement action plan that is referenced in the Plan. This action document should identify upcoming events, public involvement goals (e.g. increasing the number of people on the TPA Hanford Listserv), public involvement strategies, and decisions for the calendar year. Ideally, this action document will serve as a blueprint for TPA agencies public involvement activities.

90. John Wood, Hood River, Oregon

Comment F: The Plan should include an annually updated set of goals and action plan for the coming year. The Plan must have measurements for their new goals for public involvement. Without measurements, goals are meaningless.

91. Gerald Pollet, Heart of America Northwest, Seattle, Washington

Comment B: Secondly, this plan does not have any strategies for how you are going to increase public involvement. Someone asked about the e-mail list. An annual action plan as is used in many other public involvement plans around the region and nation would ideally have an annual strategy for how

you are going to improve and expand notice. For instance, how will you improve and expand the e-mail list, which right now 50 percent of it is contractors and officials and not really the public, leaving only about 350 people on the e-mail list for the largest public works project, the most important environmental project in the northwest. That's dismal.

An annual action plan would have an element of how we are going to expand and improve that for the year with the ability of the public to say here are suggestions and to hold you accountable at the end of the year for whether or not you did anything to improve.

Comment D: An annual action or strategic plan should be something that the Public Involvement Plan commits the agencies to prepare and then evaluate how the agencies did at the end of the year. "What will you be doing this year to inform people about the findings of the \$50 million Tank Closure and Waste management EIS?" – would be an example of what would be in an annual action plan. So would a plan to expand the email or other notice list – which would allow agencies to be held accountable in yearly evaluation.

Response to Annual Updated Goals and Action Plan Comments: The Parties acknowledge some commenters have asked that a public involvement strategic plan, updated annually, be included as part of the Hanford Public Involvement Plan. The Parties do not agree with the inclusion of such a document in the Plan. The document would require frequent updating and the Plan is not updated on a frequent or annual basis. The Plan identifies the overarching public involvement goals in Section 1. These goals provide the basis for more detailed communication plans that may be developed for key decisions. These communication plans vary from a few paragraphs to several pages and reflect feedback received from stakeholders and/or the public.

The Parties developed and use another tool, the "TPA Public Involvement Calendar" (http://www.ecy.wa.gov/programs/nwp/PI/pdf/TPA_PI_Calendar.pdf) to identify upcoming decisions and public involvement activities. It is updated frequently as information is revised or becomes available. The calendar is discussed at the TPA Quarterly Public Involvement Planning meetings. As stated previously, the Parties plan to do an annual evaluation that will be based on goals identified in the Plan.

As noted earlier, we are adding to the listserv names of individuals who electronically comment on documents and encouraging individuals to sign up for the listserv at outreach activities (e.g., Speakers Bureau).

The Hanford workforce, including contractors, makes up a large part of the Tri-Cities public. Many of those individuals use their work email to receive Hanford cleanup information. The Parties do not believe this public can or should be ignored or discounted.

4.12 Public Involvement Commitments/ Requirements

4.12.1. Legally Binding

92. Eric Adman, Kenmore, Washington

Comment B: The Plan's commitments *must be legally binding*.

93. Mark Loper, Heart of America Northwest

Comment A: Okay, hi, my name is Mark Loper, and I really do think that there should be commitments in the plan and that it should be legally binding. It's kind of absurd to think that there can be a legally required document without any commitments or having it being binding.

94. Linda Greene, Spokane, Washington

Comment C: The Plan should also be a legally binding document which must be followed stating when the public has the right to a meeting and how people can access the information necessary to formulate a response to a proposal- either positive or negative.

95. John Wood, Hood River, Oregon

Comment A: I believe the Public Involvement Plan for addressing the clean-up at Hanford (and the plans for other nuclear facilities) should be a legally binding document with commitments and measurable goals of public involvement.

96. Jan Castle, Lake Oswego, Oregon

Comment C: Here are my suggestions:

Accountability: This should be a legally binding document, as the Public Involvement Plan for any other Superfund site would be. The fact that it involves a federal agency is no excuse for not ensuring minimum levels of public participation. In the case of USDOE, given the vast scope and expense of Hanford clean-up as well as lack of trust of the agency by the public, it is even more important that public participation be guaranteed.

Every place you have used the word "strive" should be replaced with measurable goals and specific strategies.

97. Mark Loper, Heart of America Northwest

Comment D: So I'd just like to reiterate all the recommendations and advice that we gave in the presentation earlier, and then just stressing that with no commitments in the document, it's hard to

think that the document is being treated seriously. And all of our advice points are asking for commitments for ensuring or guaranteeing. And without those different pieces, it's – the document is practically meaningless. So I think like having base minimum commitments listed in there, at least the legal commitments that are listed in there, clearly and well defined is extremely important to having this plan be successful.

98. Gerald Pollet, Heart of America Northwest

Comment F: We believe that a Public Involvement Plan is not worth the paper it's written on if it doesn't have commitments that the public can rely on. If when you pick it up, you can't say "Here is when I am assured of a public meeting," if you can't say "Here is when I know there's a grant program that we can rely on for notices," then it isn't worth having.

99. Tom Carpenter, Director of Hanford Challenge

Comment B: And I think that even as comments are being solicited on this public participation plan, you know, really the oomph is not there, the significance, the commitment is not there just beyond all the other things going on that have been talked about today, which I agree with: There needs to be more commitments in the plan. There needs to be accountability. There needs to be transparency.

Response to Legally Binding Comments: Neither CERCLA nor the TPA states that the Plan is a legally binding document. The Parties take full responsibility for meeting the legal requirements set forth in applicable regulations and we regularly conduct public involvement activities beyond what is required. For example, the Parties conduct informational forums, topical workshops, and comment periods on non-regulatory documents.

The Parties conduct public involvement activities in accordance with legal requirements and direction (i.e., NEPA, RCRA, CERCLA, and the TPA). The Frequently Asked Questions, Appendix A of the Plan, include information on public involvement legal requirements.

4.12.2. Federal and State Public Involvement Requirements

100. Mark Loper, Heart of America Northwest

Comment C: I think that the EPA should reject any plan that does not meet its own Superfund requirements, which states that the plan should ensure elements will be followed and that Ecology should not agree to any plan which does not meet the minimum requirements under state law. So I think that the two agencies, other than the DOE, should stick to their guns in following their own rules and not letting this federal agency kick them down the road. Then I agree and echo Manita's and Gerry's comments.

101. Gerald Pollet, Heart of America Northwest

Comment G: And the rules – the National Contingency Plan is what the Superfund rules are called – specify that the Superfund community involvement plans are supposed to say what the agencies are committing to so that you, all of us, can rely on what’s in there and hold them to it. It isn’t just saying “we’ll try and use Facebook.” So what? It’s not saying “If there’s significant interest maybe we’ll agree to a public meeting.” It’s saying – it should be saying “When you write a letter or an e-mail to this official and ask for a public meeting, here is the criteria that you can rely upon to be sure there will be one or if it’s rejected here is the criteria right there in front of you to see why it was rejected,” not “We didn’t want to have our managers go out that week” or “We couldn’t afford it.” We are tired of hearing Hanford can’t afford to do public involvement.

Response to Federal and State Public Involvement Requirements Comments: The format and content of a public involvement plan are not legally defined. However, CERCLA requires a public involvement plan, also known as a community relations plan (CRP). This plan is based on community interviews and other relevant information and it specifies public involvement activities for cleanup actions. This process was followed in creating the first Hanford CRP (now known as the Hanford Public Involvement Plan) in 1990. This is the fifth revision to the document.

The Plan is a TPA document signed by DOE, EPA and Ecology. The Parties have agreed that the Plan meets state and federal requirements.

4.13 Public Comments

4.13.1 Responding to Public Comments

102. Nancy Kroening, Phoenix, Arizona

Comment D: People who comment on proposals should receive credible responses, even if the comments are not in the form of a question.

Comment G: The most important part is that decision-makers really listen to members of the public who care enough to study the issues. And, they need to incorporate the ideas into action. Otherwise all the effort of public involvement is wasted. Hanford handles some of the most toxic materials in our nation. People who live around the site and downstream need to know what is going on and be able to suggest mitigation ideas. We, who visit occasionally, also need to be able to have a say in what goes on. Besides, farmlands, fisheries, drinking water, and air quality are affected for miles around.

103. Roxy Giddings

Comment C: So and I guess I did have one question. All these comments that I’ve made – I noticed that on the citizens group survey, they didn’t know whether their comments had been received or any

comment had been made back to them about their comments. And I can't remember – and maybe I just never paid attention. But I don't remember ever having anybody from Hanford ever make a comment about my comment.

So and of course if you are living in the 20th century not the 21st, like I am, you don't have e-mail. So that's a very interesting thing. Not having e-mail causes people who don't have it to be eliminated from organizations' lists, mailing lists. It gets to be really interesting. All of a sudden I'm not in the Sierra Club. I'm not in Audubon, I'm not in Greenpeace, I'm not in all of these organizations because they only want to talk to me through e-mail. So and my husband says he refuses to conform to this world, so we don't have e-mail.

104. Manita Holtrop

Comment C: Citizens who attend meetings should also have ways to send their input in, and people not attending meetings, I feel, feel that their views aren't taken into account and their views have no impact. The Agencies should demonstrate that they will incorporate the views and comments of the public in real decisions because the public aren't going to be fooled if those decisions that they objected to are gone ahead with anyway.

105. Hanford Advisory Board Advice #251, submitted by Susan Leckband, Chair

Comment G: The Board advises the TPA agencies add language to the Plan to reflect how public input was incorporated into decisions as a response to the public comment process. Furthermore, the Board reiterates the point in Board Advice 225 that the TPA agencies provide their responses to public comment two weeks prior to formal decisions.

106. Jan Castle, Lake Oswego, Oregon

Comment F: Response to comments: Only once have I been sent an email copy of the responses to testimony. I understood at the time that it was legally required for you to read, catalogue and respond to all the public comments submitted on a given topic. This made me feel like my time had not been wasted in attending meetings and crafting comments, and I could see how my comments affected the outcome. If this is not a legally required process, it should be, and would go a long way toward building public trust of the Tri-Party Agencies. It also gives you the support to do more thorough clean-up than you might have been able to rationalize without public demand. I assume that you all want to do the best job possible, and public demand usually results in your being able to accomplish more than you had originally proposed. This kind of response report should be issued within 60 days of the close of public comment, and before a Record of Decision is made.

Response to Comments on Responding to Public Comments: The Parties agree. It is important to complete the communication loop and let the public know how their input did, or in some cases did not, affect a decision.

All public comments received during a formal public comment period (e.g., CERCLA action, Hanford Site Dangerous Waste Permit action, proposed changes to the TPA) are responded to and considered

before finalizing a cleanup decision. CERCLA decisions (referred to as a Record of Decision) include a Responsiveness Summary that summarizes public comments received on a proposed cleanup plan and provides the Parties' responses. The Responsiveness Summary also identifies what changes were made based on public comments. Public comments received on other documents such as significant proposed changes to the TPA or Hanford Site Dangerous Waste Permit actions, are addressed in a Comment and Response document.

Anyone who submits an electronic comment, makes a comment at a public meeting or submits a written comment and provides an address is notified when the Comment and Response document is issued and how to access it in the TPA Administrative Record. Individuals who submit comments in writing or electronically are notified and provided a link to the document. Also, listserv notices announce the availability and access to comment and response documents. We encourage those who provide formal public comment to join the Hanford Listserv or provide their contact information so that we can notify them that a Hanford decision had been made.

The Parties acknowledge the HAB's advice to provide responses to public comment for public review two weeks prior to issuing formal decisions. However, we do not agree with the need to add an additional review period. We carefully weigh all comments received before formal decisions are finalized.

4.13.2 Public Input Influence on Cleanup Decisions

107. Tom Carpenter, Director of Hanford Challenge

Comment C: And, you know, personally having seen – I call it Kabuki Theater – a lot of the public comment periods, folks who have gone to it – you know, you can pretty much dip into almost any of these meetings over the years, and it's agency heads, you know, paint pretty much a rosy picture of what's happening at the site. They sell a plan.

The public interest groups have representatives that have been studying the issue. I'm one of them. We get up and often criticize what's being said. We tell people things that weren't said. The crowd gets pissed off at the fact that they feel like they have been lied to or not told the whole truth about what was happening. The comments come roaring in. People feel like, you know, this is why the trust level is low at the agencies. And then everyone goes home, and kind of wash, rinse, and repeat, right? And then the next year.

So it's a little depressing, because it does feel a lot like not a whole lot changes over the years, that there isn't real good feedback, real good hearing on the part of the agencies or listening. And it just seems like we're being sold a plan over and over again.

And again, it's not necessarily the fault of the folks who are here. I think a lot of times these decisions are just made in D.C., that they just want to do what they do. It's disconnected from the public participation process.

I'm not sure how we fix that. I don't give the public participation and comment process all that much weight. Personally I think, you know, organizing and pushing through what we need to see happen is the way to go. And it's just – you know, democracy is – things aren't given to you, right? You have got to go and take it. You have got to, you know, have your voice heard. And everything we have ever gotten at Hanford has been because we have organized enough loud voices to make that happen.

But it would be great to see a day when people's opinions are genuinely solicited, heard, listened to, and incorporated. And I think we would all like to see that in this room. I'm not sure how we get there in the processes that are laid out. But I think that's a vision we can all share and then work towards and maybe, you know, with some work and intention we can make it.

108. Ken Niles, Oregon Department of Energy

I would like to expand on comments that I previously made during the November 9, 2011 webinar.

Comment A: We would like to see the plan contain a more substantive discussion that realistically addresses how and when the public may actually influence the cleanup decisions that are made. The bullets listed under "Importance of Public Involvement" on Page 8 of the Plan are somewhat superficial; appear to be mostly from the perspective of the agencies rather than from the perspective of the public; and do not reflect the complexity of how public input is considered.

An example is the recent consideration of cleanup actions for a number of plutonium waste sites within Hanford's Central Plateau. The Tri-Parties conducted a series of mostly well-attended public meetings on this topic. Public comments received at the meetings overwhelmingly favored the removal of additional plutonium from the soil. The Record of Decision did not reflect that input from the public.

It is understandable that public sentiment will sometimes not be consistent with the cleanup decision, as there are many other factors to consider as well. But when the Tri-Parties stress that public involvement and public input is important, and then from the public's perspective their input is not acknowledged and seemingly has no real impact, there is a definite need to better explain how public comments are considered and used. There needs to be a clear statement that public comments may not always result in a change to a proposed clean-up action, as well as some additional discussion of why this is the case.

In general, we're pleased with most of the other proposed changes to this document. It is certainly time for it to be updated.

109. Dan Serres, Columbia Riverkeeper Conservation Director

Comment B: Columbia Riverkeeper’s staff and members are dedicated to a long-term solution for Hanford cleanup, and we strongly urge U.S. DOE to increase the transparency with which decisions on cleanup are made. In particular,

U.S. DOE should disclose when a significant scientific disagreement exists with regard to its decisions. For example, U.S. DOE argued in its decision for the PW 1,3,6 and CW-5 liquid waste disposal sites that plutonium is fundamentally immobile in Hanford soils. Hundreds of comments, including detailed scientific analysis by the State of Oregon, disputed this claim. U.S. DOE should acknowledge in its response to comments and Record of Decision (ROD) when significant scientific uncertainty remains about the underpinning assumptions of its decision.

Comment E: U.S. DOE should clearly indicate how public comments are incorporated into final decisions about cleanup. When the public submits comments about cleanup decisions, the U.S. DOE should clearly identify the issues raised and the reasons why the DOE’s decision resolves the issues.

110. Ken Niles, Oregon Department of Energy

Comment G: Right now a lot of people are aware that there was a very strong sentiment by the public regarding some new plutonium contaminated waste sites at Hanford. The decision made and the record of decision, which was also endorsed by the regulators, was really contrary to very strong input from the public. And I think right now we are in a little bit of a crisis, if you will, in terms of public creditability from Tri-Party Agencies, and I hope that his document can verbalize, if you will, really what public involvement means because there are folks in the public that think we have made a very strong argument, in this case to remove more plutonium. The Tri-Party Agencies, as far as we know, didn’t necessarily consider those comments because they certainly didn’t follow through.

I recognize, although I don’t agree with it in this case, I recognize there are some occasions where public input may be considered but not actually influence the final decision, and I think there needs to be a very frank discussion within this document about when those occasions might occur. My one comment and, again, we’ll follow-up in writing, I hope for a more frank discussion and consideration of what public involvement really truly means and what type of influence can occur and may not occur at times because I don’t think we really see that in this document, and I don’t think we’ve seen it in past versions of this document. And as I mentioned, I think we are at a point where the credibility of the Tri-Party Agencies, in terms of listening to the public comment, is a little bit in a crisis mode.

111. Liz Mattson, Hanford Challenge

Comment E: There was a recent comment period on 21 waste sites on Hanford’s Central Plateau, called PW-1,3,6 and CW-5, in which a majority of the comments urged the Department of Energy to dig up more plutonium than they were planning to remove. The final decision was made for remediating these waste sites and was issued in a document called a record of decision in late September. A few impacts

were made to the language of plutonium removal in the response to public comments, saying that although the Department of Energy and EPA do not consider plutonium that will be left in place to pose an unacceptable risk, they will, based on public comment, assess plutonium 239 and 240 levels after public input on decision-making be it supportive or unsupportive. I would also like to see language in the plan that reflects an effort to incorporate public values and input into decisions and a communication process that allows the public to see the impact they have had.

Response to Public Input Influence on Cleanup Decisions Comments: The Parties consider all comments received from the Tribal Nations, stakeholders and public. There are many instances where a cleanup decision was influenced early in the process and/or after public comment periods based on input. However, public input is not always incorporated into a final decision. In cases where there was significant input (large number of related comments), the Parties are responsible for explaining why their final decision did not incorporate or reflect that input. The Responsiveness Summary or Comment and Response document provides the explanation for why input was or was not used. In the case of the final cleanup decision identified for the plutonium and cesium sites in Hanford's Central Plateau, the Responsiveness Summary went into detail identifying public concerns and explaining where the Parties did and did not concur. The Summary also provided in-depth explanations behind the Parties' decision.

4.14 Public Comment Periods

4.14.1 Length of Public Comment Periods

112. Mark Wahl, Langley, Washington

Comment D:

- Comment periods delayed until a 30-day window actually exists.
- Adequate comment time allowed at meetings.

113. Dan Serres, Columbia Riverkeeper Conservation Director

Comment C: At a minimum, when DOE is approaching a final ROD for cleanup, the public should be involved and engaged. The public involvement period should be no less than 60 days for final decisions.

114. Jan Castle, Lake Oswego, Oregon

Comment C: Insignificant **time** from notification to end of public comment has been the rule recently. You have been good about extending those periods when asked, but the plan should include a

guarantee that comment periods will be extended until all records have been available for at least 30 days. Records must be read and processed by the public interest groups before they can send out Citizen Guides, then citizens must have a chance to read and digest the information before attending meetings with the agencies to hear their side, then have adequate time to prepare their own comments.

115. Gerald Pollet, Heart of America Northwest (written comment during webinar)

Comment C: Why doesn't the draft plan include a commitment to extend comment periods for the period that USDOE has withheld documents relating to the proposal from public disclosure? Ecology committed to ask for this in a legal settlement over records being withheld relating to landfills and burial grounds.

Response to Length of Public Comment Periods Comments: *We agree that the decision documents out for public review and its supporting documents need to be publically available during the public comment period on any CERCLA Proposed Plan and Hanford Site Dangerous Waste Permit Action, as required by law. These documents must be available for review during a CERCLA public comment period and a minimum of 30 days before a public hearing. If for some reason these documents are not available, the public review time and public comment period must be extended on that cleanup action. This is a legal requirement that the Parties are required to fulfill. This is clarified in the Frequently Asked Questions, Appendix A of the Plan.*

If there are requests from the public to extend the length of a public comment period, the Parties often provide an extension. Those decisions are made on a case-by-case basis.

4.14.2 Records Accessibility

116. Hanford Advisory Board Advice #251, submitted by Susan Leckband, Chair

Comment D: The Board advises the agencies add language to the "Public Comment Periods" segment of Section 1 of the Plan to clarify how documents may be found on the Hanford Website and in related information repositories. The added language also needs to clarify how comment periods shall be extended when key documents are unavailable.

117. Dan Serres, Columbia Riverkeeper Conservation Director

Comment D: The Administrative Record for decisions on Hanford cleanup must be accessible and complete during public comment periods. The U.S. DOE, U.S. EPA, and Washington Dept. of Ecology must provide all documents relevant to their decision-making process in the administrative record. The public involvement plan does not include an enforceable deadline for submitting all information into the Administrative Record that will be used as a basis for cleanup decision-making. This is particularly important for final RODs for cleanup.

118. Manita Holtrop

Comment E: I'm rather new to this issue. I've only been in Seattle six years. I'm not a brain surgeon, but it makes a lot of sense that if we have got a month to comment on documents and we can't see the documents, that there's something wrong there. I think we would all agree on that.

119. Gerald Pollet, Heart of America Northwest

Comment J: The third major point here is access to records that are not guaranteed in this plan. We have one of our former law students here who worked on this.

The Department of Energy asked the State of Washington to keep from you and all of us and the rest of the public such things as the locations of where the unlined burial grounds that are 40 miles long are at Hanford in their Hanford Hazardous Waste Department, stamping these documents, their permit application documents, "Official Use Only," as if it was a secret. But it's not a secret. It's actually required by the federal and state hazardous waste laws that they show those things and provide it to the public to review. But the energy department asked that these be kept secret and not disclosed to the public under Washington State's public records law.

Heart of America Northwest went to court because we couldn't review the public – the Hanford hazardous waste permit for these 40 miles of leaking, unlined soil ditches unless we could see the stuff that was blacked out, pages, pages blacked out.

It turns out they didn't have a legal basis for having it stamped "Official Use Only" and blacking it out. And the Department of Ecology settled with us and adopted a policy that said when the public asks for the records, if the energy department objects, there will be a day-for-day extension of the comment period if you're entitled to those records and they relate to the decision.

You can't comment on a permit if you can't see the underlying documents. We can't do our job and analyze it and tell you what's in it and suggest comments for you if we can't see what's in the documents. This is fundamental for open government and a public involvement plan.

The Department of Ecology committed to ask the other two agencies to amend this plan to have that same principle in it, saying that if you don't have access to records, the comment period will be extended until you do day-for-day and that documents that are not – that are disclosable under the federal Freedom of Information Act will not be withheld under the state law from you being able to see them.

What happened? The Department of Energy didn't like this deal. They negotiated with the State of Washington, violated our settlement agreement, changed it so that they get more time to keep documents from you. So now they can keep documents from you for a full month. And the comment period on these plans and proposals you will see in the plan is how long? Usually a month, yes. The written comment period, 30 days. You can get an extension on the CERCLA ones for an additional 30 days. But if the energy department is allowed to withhold documents for 30 days and there's no legal

guarantee in the plan that there will be a 30-day extension day for day, we're screwed and you are screwed and we can't see the records that we need.

And this plan should guarantee a day-for-day extension and should specify that the energy department will not be stamping documents "Official Use Only" unless they are exempt under the Freedom of Information Act and they can specify what the exemption is. Those exemptions are very, very narrow.

This isn't just a Hanford problem with the energy department, by the way. The Inspector General has issued reports. The General Accounting Office has issued reports. Congress has had hearings and issued reports on the energy department's abuse of this. As if these documents are secret, they stamp them "Official Use Only." The documents are not in the actual classifications for secret. It's been abused across the country.

And we're seeing it here at Hanford, where things like a permit application are stamped so that we can't review it even though the federal and state hazardous waste laws say you have to have access to it in order to review it. So we have to change it.

So on the back wall you now see a slide of a portion of the hazardous waste permit application for Hanford's unlined low-level burial grounds as disclosed to the public. Try commenting on that baby.

If you would move to the next, the next slide? Another page deleted. This is the joker, this page, because they deleted a map showing where the burial grounds were, which was actually readily – when we finally got this, it turned out that the map was the same map that was readily available in environmental impact statements or online. But of course we didn't know that for many months when we were trying to review the hazardous waste permit application.

Now, it's nice to hear EPA say, "Oh, that's not us," except that many of these burial grounds, these are – I call them burial grounds. That's their term. These are the 40 miles of unlined ditches into which the energy department dumped radioactive waste. So picture from I-5 from Seattle to Everett – actually, to Marysville, three lanes 50 feet deep filled with chemical and radioactive wastes. A pretty dismal picture, eh? And then maybe you might want to comment on them.

And the energy department is saying most of those will fall under the Superfund cleanup not the hazardous waste law, based on "Trust us." They can claim that we don't have hazardous waste in a lot of them, but no one has ever looked. And we know there's hazardous waste in many of the areas they say.

But the permit application is a document that will be used for both processes to try to – you know, in terms of the documentation. And how do you review this?

Now, Ecology agreed in a legally binding settlement that they shouldn't have withheld the documents and – well, they didn't say that. They said, "We're going to change our policy and agree to settle the lawsuit and pay a penalty, and we're going to have new policy so we have a day-for-day extension" and that only ten days for documents to be withheld and if the energy department wants to stop us from exposing these things they will have to go to court.

Then unilaterally the energy department and Ecology got together and revised this decision, so that now in effect the documents can be withheld for 30 days. That's their new policy. 20 business days works out to be about 30 days in real life. And the permit or other decision comment periods are only 30 days long lawfully. And so it get withheld.

Also, it just happens that under our state Administrative Procedures Act, guess how long you have to sue the Department of Ecology over a decision that it's made? 30 days. So if you can't see the documents to see if their decision was sound, then they get off scot-free. And they changed this unilaterally without any public comment or even a discussion with us.

Now, you decide if that's okay and tell the agencies what you think, because that's the real picture.

And it's not the only document. There are many others that are stamped "Official Use Only."

And to EPA's credit, during the plutonium liquid waste discharge site comment period this summer, we couldn't get the basic documents. They were not available. And only after the Seattle public hearing held in this room did the agencies make the documents available for us to review. And they extended the comment period, but it was too late to benefit you if you came to this hearing, because we didn't have those documents before the Seattle public hearing for you to see. There is something wrong with that.

What the agencies ought to be committing to is, if they withhold those records they have to come back out to the public after we have had a chance to review them for 30 days.

Response to Records Accessibility Comments: The Parties agree that decision documents out for public review should be publically available for the duration of the comment period. The Parties work to ensure documents out for public comment are accessible prior to the start of a comment period. The documents are sent to the TPA Administrative Record (<http://www2.hanford.gov/arpir/>) for that particular action and Public Information Repositories (PIRs) in Richland, Seattle, Spokane and Portland. The contact information for all the PIRs is found in Section 3 of the Plan.

Links to the documents can also be found on the Hanford Events Calendar at www.hanford.gov/pageAction.cfm/calendar during the comment period. These links also provide access to other supporting documents.

Regarding Ecology's policy, the agency's Nuclear Waste Program did change its policy on how it deals with security-sensitive materials it receives from the Department of Energy at Hanford. The policy includes an explanation of when and how Ecology comment periods may be extended when potentially sensitive materials may be involved.

4.15 Funding for Public Participation Groups

120. Dan Solitz

Comment: I would like to strongly support public funding for participation. I think particularly in the technical areas, it's extremely difficult to get good quality analysis done and it's not inexpensive to do it. I want to thank you for putting this on and I want thank everybody else for being here tonight. I want to thank Ken for sending me an e-mail to invite me to be here.

121. Daniel Noonan

Comment: My name is Daniel Noonan, N-o-o-n-a-n. And one thing about the public participation grants which I did benefit from – I did have a job with WPSR that is now in question – is that we just don't take that money and like work with it. We use it to get volunteers and to get a lot of people involved. So that money goes much further than just like the dollar amount spent. And I think it's very important to keep funding those.

122. Jacinta Heath, student at University of Washington

Comment B: Also, I think it's a bad idea to cut funding to the community involvement organizations, because it's been shown in the past and currently that they're recruiting more people to become part of this process

123. Gordon Smith, Seattle, Washington

Comment A: First, restore DOE funding for Citizen Group efforts and mailings regard meetings & agendas.

124. Jan Castle, Lake Oswego, Oregon

Comment I: Finally, I urge USDOE to cover the Public Participation Grants that the Washington Department of Ecology is no longer able to provide to the public interest groups. Heart of America Northwest does most of your outreach for you and provides excellent information to the public. That absolutely must continue for you to be able to provide even a modicum of public participation. I rely on a combination of their information and what I hear from the Tri-Party Agencies at hearings to form my comments, which I consider my responsibility to contribute.

Comment J: Yes, this is Jan Castle. I'm a member of Heart America Northwest. I'm the one that asked the question about the public participation grants, and I find myself rather bemused by Dieter's comments, where he seemed to be indicating this is about something that's being considered in the future, where in reality the funding was cut right in the middle of the project that had been authorized by Ecology for Heart of America Northwest to spend money on.

So this whole thing about maybe in 2012, something like this may happen or maybe they'll decide not to do this doesn't make any sense to me. It appears to me that Heart of America Northwest and the other public interest groups are the ones who are doing your job for you in getting any public involvement at all at Hanford.

So I can't understand why someone wouldn't immediately step in and say, yes, DOE will find a place in their budget to take this what must be a miniscule amount of money in the overall budget to make sure that these public participation grants are restored to the public involvement group.

125. Gerald Pollet, Heart of America Northwest

Comment O: So those are some of the thoughts we want you to add to the record in Spokane tonight. And I appreciate that you held a meeting here. Sorry that more people aren't here. We wish we could have done more, but this is the future of public involvement. We know from survey results that, and just from asking people to raise their hands at public meetings, you know, 80 percent sometimes of the people who come, come because of the work that we're doing, because of the turnout work.

And in terms of the survey, Bill, if you're on the listserv, the survey was sent to everyone on the listserv. Everyone. If you, if you didn't have an e-mail address on the listserv that ended in like nor or, you know, one of the contractors at Hanford – (Note, Mark Loper clarified the Tri-Party listserv) Right. Yeah. You were not sent a copy of, to participate. And then we took a sampling of the lists with, actually, pretty good rigor for the survey in terms of taking a sampling and polling people who did not respond electronically and asking them. So it sounds like you were not one of the people who we sampled by phone. But that's what happens when you do a sampling of the people on the list.

126. Gerald Pollet, Heart of America Northwest

Comment I: The energy department spent at least \$300,000 on a pair of videos in the past 12 months. How many of you have seen their videos? Slick, have an announcer, pay for a narrator, pretty damn one-sided. The first ten minutes or something are man-on-the-street interviews, "What do you think about Hanford?" as if that is going to help us understand that high-level nuclear waste tanks are leaking and spreading contamination towards the Columbia River. That \$300,000 would pay for hundreds of citizens to show up at meetings over the next two years. It's something for the agencies to think about.

127. Tom Carpenter, Director of Hanford Challenge

Comment A: I'm the director of the Hanford Challenge and have been coming to also make comments here about Hanford for 23 or 24 years. And I used to work with the Government Accountability Project. And it's – I've made a lot of comments, so I'm not going to say a lot tonight, but I did want to just point out a couple of facts and observations.

One is that the cleanup budget for the Hanford Site is somewhere around \$2 billion a year. And the DOE just issued a document saying that cleanup costs over the life cycle of the cleanup to 2090 is about \$115 billion. That doesn't include – I mean, that kind of underestimates, actually, some of the cleanup costs that we know are going to be out there.

But the public interest groups – there are four that were in line to get grants. And for a two-year period, that would have been \$440,000. So do the math. \$2 billion a year, that's a quarter of 1 percent of the cleanup budget.

Now, one of my favorite sayings is "Money is policy." So we're here at a meeting talking about public involvement and the site that has \$2 billion in taxpayer money going into it that will have very severe repercussions for future generations if we don't clean this place up. Even if we do, it's going to have severe repercussions for human beings far into the future. But we can come up with a quarter of 1 percent to enhance the public involvement.

So to me, this meeting is a bit of a joke. And no offense intended to I think, you know, the fine people at the table up there. I have a great deal of respect for especially the local officials. These are decisions being made at much higher levels. And I believe these folks are sincere and want to see public involvement. However, decisions are being made at higher levels.

And, you know, even within the state, obviously at the governor's level, et cetera, this just isn't as important as it should be. So I'm a little distressed about that.

Response to Funding for Public Participation Groups Comments: The Parties understand the concern about the proposal in October 2011 to eliminate Ecology's Public Participation Grant (PPG) program – among many other programs – as the state continued to struggle with massive budget deficits. However, while there were cuts to the program, \$1.12 million was ultimately retained for PPGs in the 2011-13 biennium. About \$420,000 of this total will be used to fund the important efforts of several Hanford public interest groups to reach members of their communities and the general public.

Public interest groups are a vital part of the education and outreach efforts at Hanford. The Parties support the grant programs in helping to fund much of this work.

DOE recognizes that funding for public involvement as outlined in the President's FY 2013 Request is significantly less than the appropriation in FY 2012. While this is not the final Congressional appropriation for this activity, we are in the process of assessing the potential impacts. DOE remains committed to public involvement and may explore new ways to carry out such activities.

4.16 General Comments

4.16.1 Hanford Cleanup

128. Sylvia Haven, Seattle, Washington

Comment: It is highly probable that you really know what should be done to clean up Hanford so please put aside all influences except the public interest in health and safety and JUST DO IT.

129. Nancy Kroening, Phoenix, Arizona

Comment H:

We do insist that things be handled with the utmost care as well as economically. Why treat the same waste several times when doing it right the first time is best? I see lots of "storing" proposals and I, personally, want the wastes solidified or otherwise treated so they will not have to be handled again. We simply have too much waste to keep moving it around and around!

130. Sharon Fasnacht, Mediator, Guardian Ad Litem

Comment B: 2. If delaying cleanup, and stretching it out over more years, results in "more" cleanup problems (because the tanks rot and the poison goes deeper into the ground and water table), then don't keep delaying!

131. Gordon Smith, Seattle, Washington

Comment C: Are there any new technologies being developed regarding Nuke waste? It's always bury & make glass --- where is the R&D?

132. Carol Hiltner, Founder, Altai Mir University

Comment: It seems that there's only one thing leakier than the USDOE's promises to clean up your mess at Hanford: That would be the budget of the boondoggle vitrification plant.

Please save us from having to pay for both sides of the litigation, and KEEP YOUR LEGAL COMMITMENTS!!!

133. Bob Apple, Spokane City Council Member

Comment B: I, I am, though, as far as cleanup in Hanford, my biggest concern is reduction in funding. The promises are made, and the goals to bring the waste to the site are ramping up. But the actual ability to get to that point, I don't see, I just don't see it happening.

Vitrification plant, how far are we from actually operating it. Very far. In fact, I don't think we're any closer than the last two times they tried to get that thing, you know, up and running. I don't think we're any further along than we were the first – now, this is actually the third or more times they've tried to get this to that point.

134. Mike Conlan, Redmond, Washington

Comment: USDOE: promise to build the Vitrification Plant, to empty massive leaky, decades old, Single Shell Tanks of High Level Nuclear Waste, the new total estimate exceeds \$12 billion and this does not include many costs that were previously supposed to be included in the capital budget for the plant, to use Hanford as a national radioactive waste dump starting in several years, What an embarrassment to American Technology!

Response to Hanford Cleanup Comments: *Thank you for your comments. For the past 20 years, the Parties have worked with the Tribal Nations, State of Oregon, stakeholders and the public to identify Hanford cleanup priorities and address the highest risks. The Parties continue to make great strides in cleaning up the River Corridor, decontaminating and preparing to demolish the Plutonium Finishing Plant, and treating millions of gallons of contaminated groundwater.*

The Parties understand the public's concerns about potential costs and schedule delays at the Waste Treatment Plant (WTP), which is being designed and built to immobilize tank waste into glass. The DOE is currently addressing some technical issues to ensure that this massive and highly complex facility will operate safely and efficiently. The WTP is nearly 65% complete. As design and construction continue and DOE resolves the remaining major technical issues, work continues to remove waste from the single-shell tanks and transfer it into the newer double-shell tanks.

Although significant cleanup work has been accomplished since the signing of the TPA in 1989, much work remains.

4.16.2 Solar Power

135. Jack Edwards

Comment: After looking at the Public Involvement Plan draft I realized the meeting is not what I imagined and don't feel a need to participate. All I wanted to do is say is that I think the best use of the site would be to convert it to a solar energy generating station.

Response to Solar Power Comment: *The Parties appreciate your input.*

4.16.3 Nuclear Power

136. Frans Bosman, Mosier, Oregon

Comment: I don't need to go into specifics, especially technical ones related to the safety of ANY nuclear operations or sites. You know it too well. All I suggest is that, in spite of perhaps fear to lose your position, or criticism from higher ups, you help end the cycle of denial, greed, fear, ignorance and monetary pressure, which surrounds the decision making process concerning nuclear plants. Please be an example of one who has the political will and courage to see things for what they truly are, and become a force in ending this obviously dangerous situation.

No more needs to be said. You conscious will have to do the rest.

137. Sharon Fasnacht, Mediator, Guardian Ad Litem

Comment D: About Nuclear Waste and Power Generation: 4. Until storage of this obscene waste material is solved, NO NEW NUCLEAR POWER PLANTS SHOULD BE LICENSED/BUILT. But...too late... Some 23 new plants were authorized by Cheney in our Southern States.

PLEASE HEAR ME:

ANY OF THESE PLANTS WHOSE MANAGEMENT HAVE NOT, OR DO NOT, ADDRESS WASTE DISPOSAL BEFORE BRINGING THE PLANT ON LINE, SHOULD NOT BE PERMITTED TO BRING THE PLANT ON LINE. (Gee, maybe they need a Vitrification plant **in their State**).

IF THERE'S EVEN A WHISPER THAT THE WASTE WILL BE SHIPPED TO HANFORD, BECAUSE, "GEE, THEY'LL HAVE A VITRIFICATION

PLANT" SOME DAY, **SAY NO!**

I AM WILLING TO SPEND MY TAX DOLLAR TO CLEAN UP HANFORD, AND HAVE BEEN DOING SO (EXCEPT – CLEANUP HAS BEEN DELAYED OVER AND OVER). HOWEVER, AS A CITIZEN, I DO NOT AUTHORIZE USE OF MY TAX DOLLAR TO DISPOSE OF WASTE FROM THESE NEW PLANTS BEING BUILT. THAT SHOULD BE THE RESPONSIBILITY OF THE CONTRACTOR/INVESTOR/STATE GOV. WHO BUILDS THE PLANT CREATING THE WASTE AND THE CONSUMERS WHO USE THE POWER.

COMMON SENSE SAYS IT'S NOT LOGICAL TO KEEP BUILDING MORE NUCLEAR POWER PLANTS. STOP!

138. Lois Duvall, Lake Oswego, Oregon and Faith Ruffing, Portland, Oregon

Comment B: We urgently request that the risks of the experimental plutonium fuel, the same as used in the Fukushima Reactor 3, be included/disclosed in the Environmental Impact Statement slated to be released in 2012 for the relicensing of the Hanford Nuclear Reactor. Given the engineering, environmental, and economic impacts of the release of this most horrible nuclear substance into the entire Pacific Rim ecosystem, it is important that these impacts on the Columbia Basin be explained to the citizenry so they can be knowledgably informed of the risks and benefits to their social and physical stability.

The Public Involvement Plan under review is an excellent platform for discussion of the many challenges facing the Pacific Northwest when considering the relicensing of the Hanford Reactor.

139. Bob Apple, Spokane City Council Member

Comment D: There's a bigger problem, and I think you people have to play a bigger part in it, and that is right now we're storing on nuclear generating sites all over the country. More waste than should be there. We've seen the articles. Plants are old, they're starting to leak, the plumbing, anyway. And they're not being maintained to the point to prevent that. So groundwater problems could occur. They've got storage tanks with Japan's problem. We found out the storage tanks are a problem all over the country now. And there's, there's a lot of it.

We hope we don't have a disaster, but it's not free to me or the people in this community. We saw what happened in Japan and the sheer lack of responsibility from that government in dealing with it, and still lacking to deal with it. You know, from what we hear, they're still, they've still got a major problem going on and reactions going on in that plant. And it's been a long time now. So they really haven't taken care of it in any way, shape or form. It's probably the worst national disaster, nuclear disaster in the world. I think it's, I think it's easily now beat out Chernobyl.

So we need to look at new nuclear in a different view. And quite frankly, we need to start, you need to start voicing, I think, the real costs of maintaining the waste after the fact. You know, because they're, they're not being calculated. We haven't spent enough. We've spent a lot. If you double and triple the expenditures down there, you still wouldn't be able to catch up to the point we should be at.

But there's been delays. But the problem is big. And it's, it's that nationally the electrical generators from nuclear are not contributing to taking care of a solution for the waste. And that has got to be addressed nationally. It's not being addressed. It's, it's subsidized.

And I have to tell you, just like wind power, it sounds great. But when I talk to the utilities, it's subsidized, too. And anytime they can lock down the fins so they don't run, it saves them money. Because they spend million to put one up. They know over the course of the life, they're gonna generate 2 million dollars worth of electricity. And that's the best they're gonna get, provided there's no disaster and have to replace a big motor operation. So they would rather lose money a little bit than have to go up and do major repairs on one of those. It just – even in today's economy, it does not pan out.

We have in the Northwest a huge surplus of electricity. You've heard that, but I haven't. Bonneville's not selling all of the electricity from the dams alone. And we have a garbage incinerator that generates electricity. We are going to take a third of the revenue that we have previously received under contract, because really, nobody wants the electricity. We also own a dam, Upriver Dam, same, same story.

So nuclear is, it's got some real problems. And I don't – I think the environmental agencies have got to start facing up to the fact there are real costs to dealing with the waste. And they're going to have to, you're going to have to start expressing those nationally. And you're going to have to start really telling the truth. Because we've got to clean up Hanford. And even if you wanted to make it a national waste

dump, I certainly don't want that, I don't think anybody here wants that, you have no ability, even if you classify the waste to store it there. So this needs to be expressed.

The real costs need to be talked about. And a real solution needs to be found. I'm not a fan of nuclear. And I never have been. But that's my bigger concern. And this economic times of cutting back both at the state, and that's one of the articles, the state made a little promise, and now they can't even keep their promise in this deal, and then you've got the Fed, which is ramping down dramatically.

And it's, it's becoming a nightmare. To me it's, it's Chernobyl. It's, it's a Japanese reactor, but there's no nuclear, at least, release at this point. It's just a nightmare that could happen anywhere in the country. And that's what really bothers me.

Response to Nuclear Power Comments: Thank you for your comments. We appreciate your interest and participation.

4.16.3 Off-Site Waste

140. Spokane City Council, Spokane, Washington

Comment B: The City of Spokane urges the United States Department of Energy to withdraw its two pending proposals to use Hanford as a national radioactive and "mixed" radioactive chemical waste dump and, instead to commit to cleanup efforts which retrieve Plutonium and other wastes from soil sites, cleanup groundwater contamination, and to empty Single Shell Tanks as rapidly as possible to reduce the total potential contamination threats to groundwater from existing wastes in soil or tanks.

141. Nancy Kroening, Phoenix, Arizona

Comment H: Also, I want Hanford officials to not invite more wastes to be sent to this site. The people of Washington do not want the Nuclear Reservation to be a DUMP of any kind!

142. Sharon Fasnacht, Mediator, Guardian Ad Litem

Comment A: Washington State authorities do a terrific job communicating about work done or planned at Hanford. The USDOE – less so. More importantly, I believe **Washington State DOE is responsive to public input (that's me)**. Not so with USDOE. Not so with the Federal Government and its nuclear power plant licensing authorities. They don't listen to input from the science community either.

Common sense says: 1. If Hanford, in 2011, is considered the "world's" most contaminated and most challenging cleanup site, DON'T EVEN SUGGEST DUMPING MORE WASTE THERE! And, what makes it worse is that it's located on the Columbia River, which flows into the Pacific. Can human beings be stupid enough to take the chance of contaminating an ocean?

143. Sharon Fasnacht, Mediator, Guardian Ad Litem

Comment C: 3. While vitrification makes the HANFORD poison easier to store, you still have to store poison! No one has answered my question regarding the “where” to store it! Above ground leaves us very vulnerable to our enemies, external and internal. Below ground, well.....

I SAY “NO” TO **ANY** PROPOSAL TO MAKE HANFORD A NATIONAL RADIOACTIVE WASTE DUMP!

I SUPPORT: Heart of America Northwest which is urging Washington State to join them in asking the US District Court in Spokane to impose new schedules for emptying the tanks, since the current schedule depended on having the Vitrification Plant operational in 2019.

I SUPPORT: Heart of America Northwest which is urging Washington to act to bar USDOE from using Hanford as a national radioactive waste dump. (USDOE had given unenforceable promises not to import waste to Hanford until the vitrification plant operated, seeking to counter the hundreds of people opposing these plans to use Hanford as a national radioactive waste dump at public hearings over the past two years. HOWEVER, USDOE now has two pending proposals to send over 30,000 truckloads of radioactive chemical hazardous wastes to Hanford for burial in shallow landfills above the groundwater (which flows to the Columbia River), with many of the wastes as radioactive as High-Level Nuclear Wastes).

144. Jane Civiletti, Oak Grove, Oregon

Comment: Having followed the workings at the Hanford repository for about 20 years it is with regret that I am filing yet another complaint. A complaint that the residents of the state of Oregon are not being taken seriously as an equal with concerns regarding the safety of the materials being stored there. A complaint that even more radioactive waste is planned on being brought to the site. A complaint that the DOE has decided it does not need to hold hearing for citizens in the adjoining state. The public is funding this place, is going to deal with the waste for thousands of years and deserves to have their concerns heard.

145. Paul Randall

Comment C: I agree with him that any failure to notify a reasonable set of people who might be interested in major events, such as shipping large quantities of radioactive materials to Hanford, needs to be very widely publicized.

146. Bob Apple, Spokane City Council Member

Comment C: I do not want to see just a big huge storage dump of waste there. And I do not want it to be the national waste dump. I’m very concerned that Arizona has changed their mind. And, apparently, politically with all the money spent, they win. They changed their mind. And everybody in DC is willing to say go, you’re out. Okay, we’ll play ball now.

Well, you know, we're not getting the money spent at Hanford to clean up this site, to take care of the problem. It cannot be a storage depo. It's just not built for it. And I'm very concerned about the ramp-up.

147. Spokane City Council, Spokane, Washington

Comment C: Spokane faces unique risks from proposals to dispose of tens of thousands of truckloads of radioactive and chemical wastes at Hanford due to routes including Interstate 90 through Spokane in addition to the documented risks to groundwater and the Columbia River from adding more waste to the existing contamination at Hanford. One pending proposal to utilize Hanford to dispose of extremely radioactive wastes with nearly as much radioactivity as in all of Hanford's leaky and dangerous High-Level Nuclear Waste tanks (referred to as Greater Than Class C wastes), and the draft environmental impact statement covering the other proposal acknowledged that groundwater contamination projected from existing wastes, before considering adding even more waste to the soil burden, would exceed health and state cleanup standards for thousands of years. Spokane's economy as well as public health and safety are affected by decisions regarding the timing, level and scope of cleanup at Hanford which have the potential to increase contamination of the Columbia River or groundwater, or which could lead to releases of contamination in the event of fires, earthquakes or accidents.

Response to Off-Site Waste Comments: The Parties understand the public's concern with the shipping of waste to Hanford. Currently, Hanford is receiving no offsite waste except for what was decided in a court settlement agreement between the Department of Energy (DOE) and the State of Washington in 2006. This agreement is available at www.hanford.gov/orp/uploadfiles/settlement-agreement.pdf.

5.0 APPENDIX A – Stakeholder Presentations

The following two presentations represent local perspectives. The first was provided by Susan Leckband, Hanford Advisory Board Chair during the November 9, 2011 Webinar meeting. The second was provided by Gerry Pollet, Director of Heart of America Northwest during the Seattle, Washington meeting on November 15, 2011 and the Spokane, Washington meeting on November 16, 2011. The third item is a resolution passed by the Spokane City Council on holding public meetings on Hanford issues in Spokane, WA.

1. Public Involvement Values

Webinar Local Perspective

Susan Leckband, Chair

Hanford Advisory Board

2. Improving Public Involvement in Hanford Decisions

Seattle and Spokane Local Perspectives,

Gerry Pollet, Director and Mark Loper

Heart of America Northwest

3. Spokane City Council resolution supporting public meetings in Spokane.

1. Hanford Advisory Board Presentation

**Local Perspective:
Hanford Advisory Board (HAB)**

Public Involvement Values
November 9, 2011
Susan Leckband, Chair

HAB Values

- The HAB is a 31 seat, diverse board of interests that provides consensus advice to the Tri-Party Agencies, (DOE, EPA and Ecology).
- The HAB has provided several pieces of advice on public involvement to the TPA Agencies.
- Meaningful public involvement is key to successful Hanford cleanup. The public brings valuable insights to Hanford remediation efforts.
- The ways in which the Tri-Party Agreement (TPA) agencies inform, involve, and encourage the public to participate help determine the quality of participation.
- A robust and successful strategy is critical to implement a policy of effective public involvement.

Public Involvement Principles

- Provide effective notice for public meetings.
- Provide understandable educational materials.
- Ensure open and transparent decision making.
- Provide easy access to public information and records.
- Incorporate public values in decision-making processes.
- Provide feedback to public on how their input was considered in decisions.

Advice & Recommendations

The HAB advised incorporating the following concepts into the public involvement plan:

- Tailor information to be understandable at all levels of knowledge to diverse audiences with varied levels of education, language or cultural differences.
- Collect values and input from diverse perspectives.
- Provide educational and interactive P.I. activities.
- Describe how public values could be impacted by proposed actions and how public comments/values influence decisions.
- Ensure government agencies are open and accountable to the public.
- Engage the public early and often.

Advice & Recommendations

The Hanford Public Involvement Plan should:

- Allow for extended public comment periods when needed by the public.
- Be a guide for the public as well as the agencies.
- Include a statement of purpose to explain the document goals and characteristics.
- Include clear descriptions of legal requirements for public involvement & decision-making process.
- Clarify how documents can be found electronically or in repositories available to the public.

HAB Public Involvement Advice

- #251 Hanford Public Involvement Plan
- #240 U.S. Department of Energy's Open Government Plan and the Hanford Community Relations Plan
- #239 Incorporating Public Involvement Strategic Planning into the Community Relations Plan
- #225 Community Relations Plan
- #222 State of the Site Meetings
- #212 Public Comment Period Considerations for Tank Closure & Waste Management Draft EIS
- #155 Public and Regulator Review and Input to Baselines

Many other pieces of HAB advice contain public involvement elements and values

2. Heart of America Northwest Presentation

Improving Public Involvement in Hanford Decisions

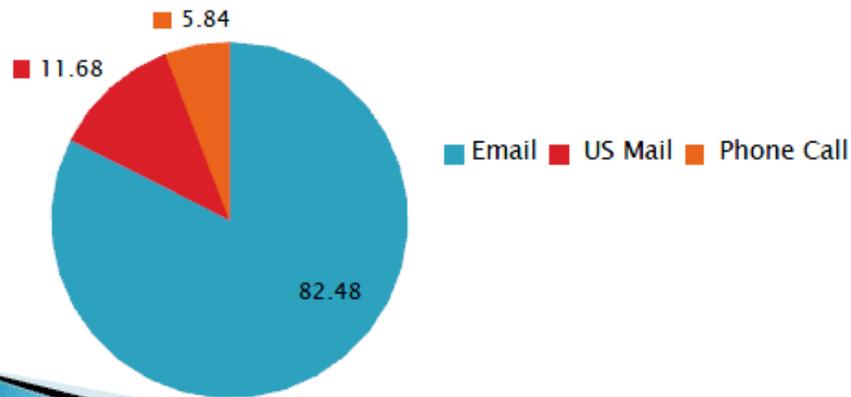
October 2011

Based on survey results by Seattle U students under Heart of America Northwest supervision

Have you ever attended a public meeting about Hanford or Hanford Clean-Up?

- ▶ 77% of respondents have
- ▶ 23% of respondents have NOT
- ▶ Total number of Respondents = 143
 - Source of Respondents – Agencies listserv without agency and contractor personnel, attendance list from public meetings, and HOANW email list supplemented by randomized portion of the non-email list.

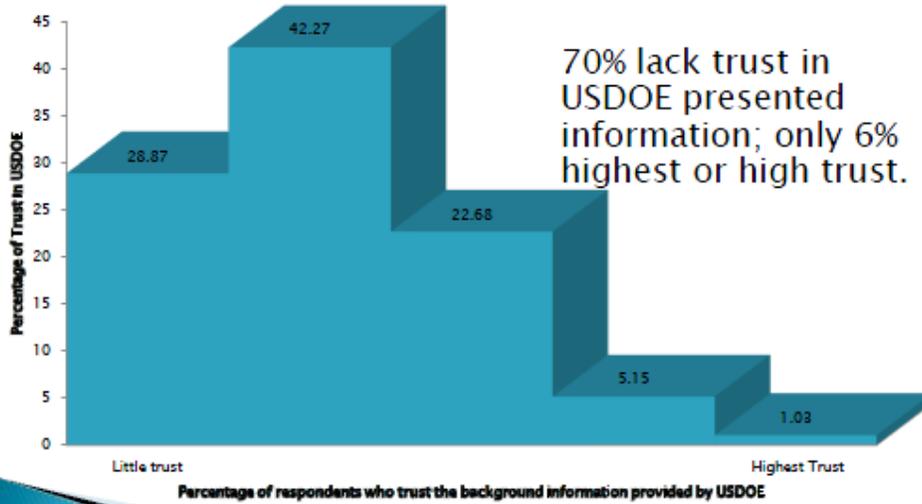
What is the best way for you to be sure to receive and read notice about an upcoming meeting in your area?



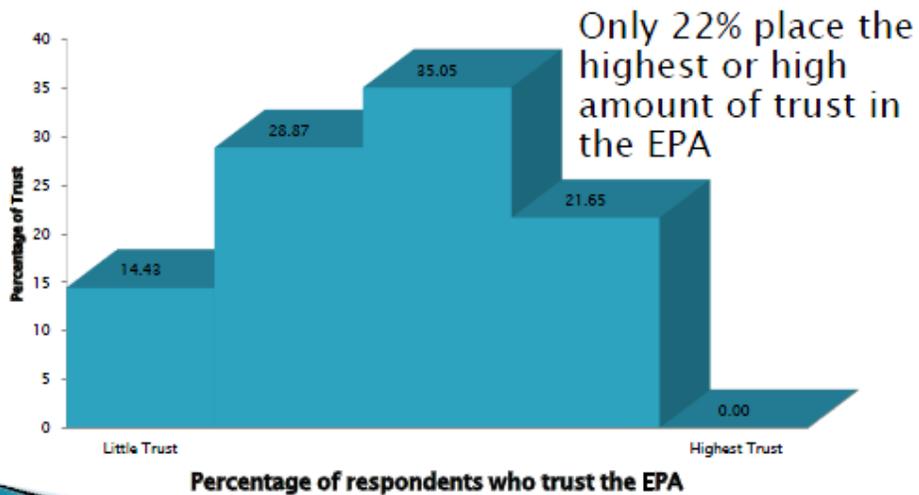
If you HAVE attended a meeting in the past, please describe the level of trust you had in the background information that presented by various people at the meeting:

- ▶ On a scale from 1 to 5.
 - 1 being the least trust
 - 5 being the highest trust.

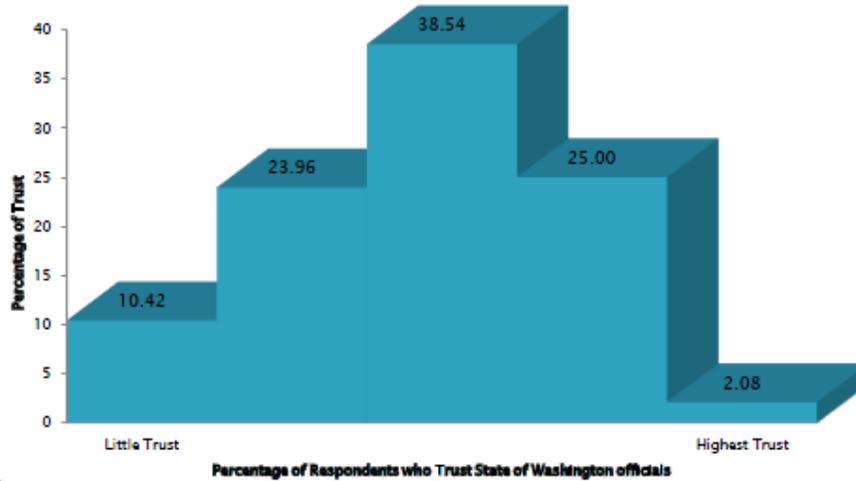
If you attended a meeting in the past, please describe the level of trust you had in the background information presented by USDOE:



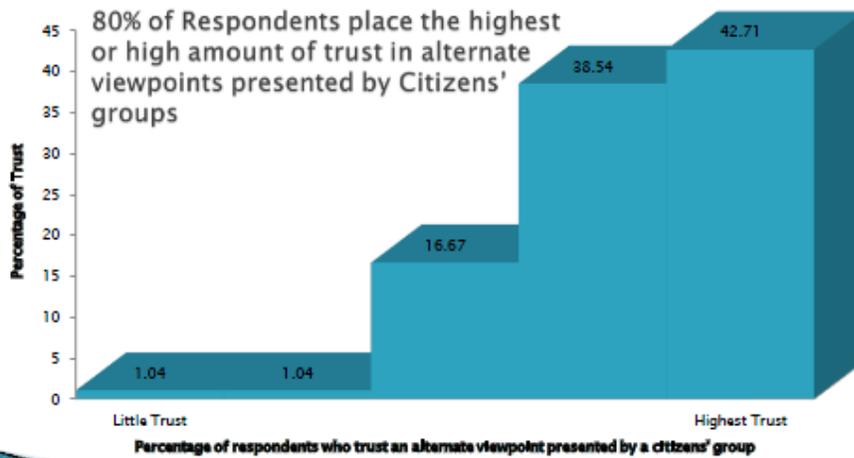
If you attended a meeting in the past, please describe the level of trust you had in the background information presented by EPA:



If you attended a meeting in the past, please describe the level of trust you had in State of Washington officials:



If you attended a meeting in the past, please describe the level of trust you had in the background information presented by a citizens' group:

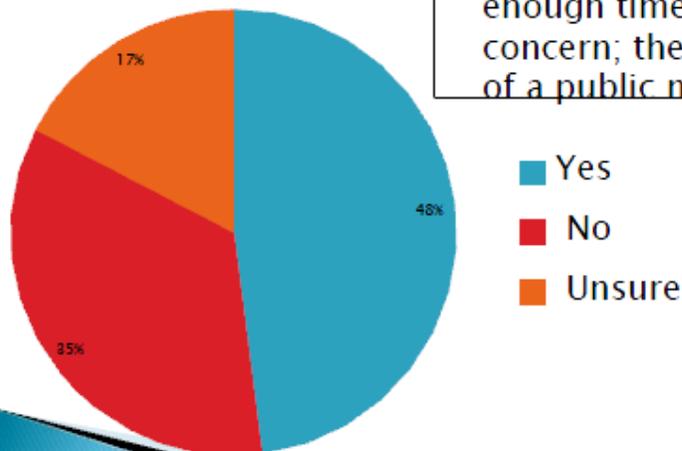


Public Meeting Issues

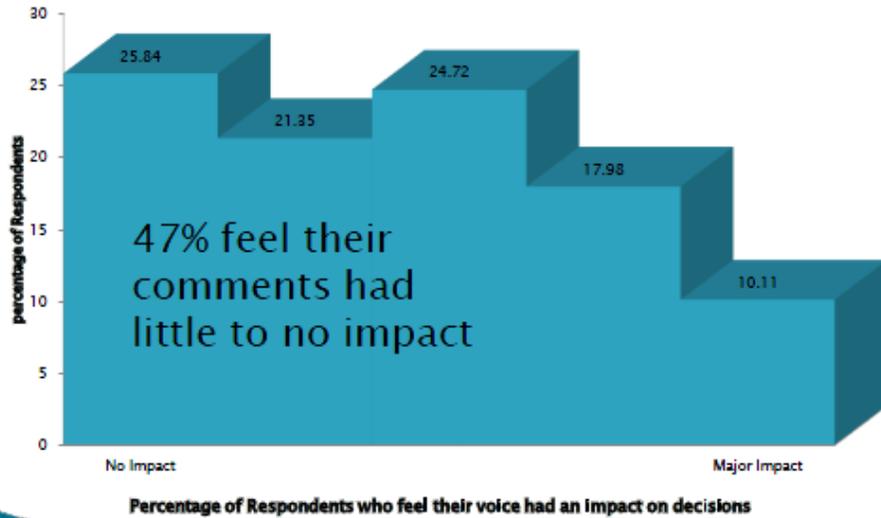
- ▶ Enough time to voice concern?
- ▶ Was voice heard?
 - Impact?
- ▶ We have separate information (not in this presentation) regarding where respondents prefer to hold meetings in each city

Was there enough time to Voice Concerns?

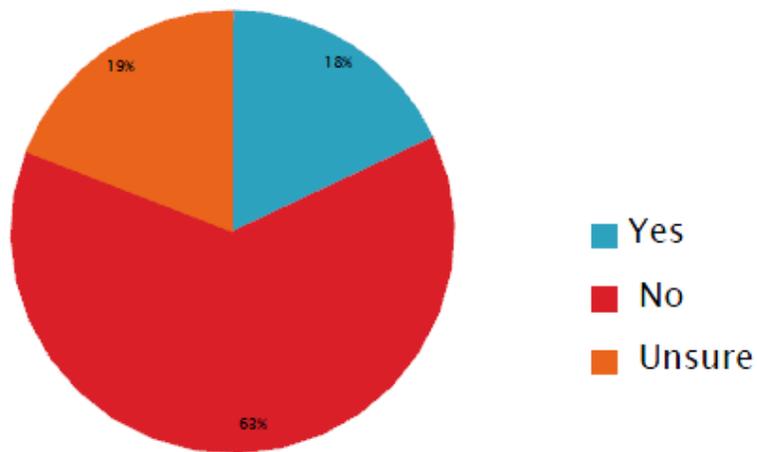
- Unacceptable:
Only 48% feel there was enough time to voice concern; the main purpose of a public meeting



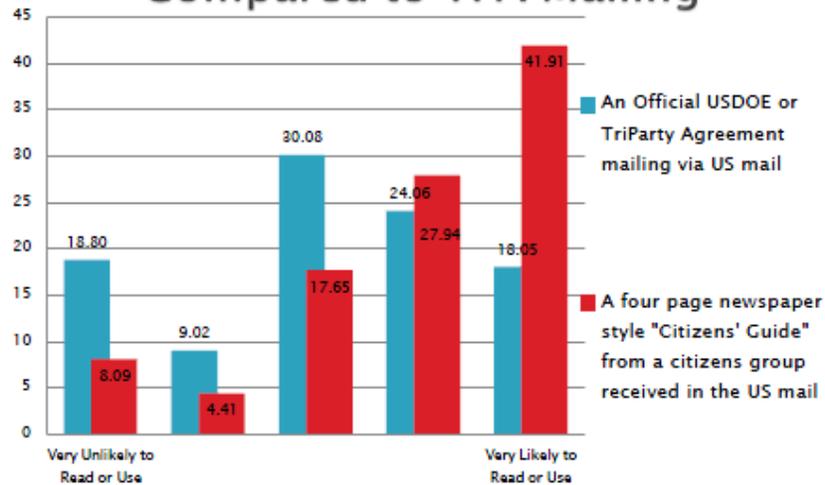
Did you feel that your voice was heard?



Do you Remember Receiving a Written Response to your Comments?



Percentage of Respondents Use of Citizens' Guide Compared to TPA Mailing



Recommendation

- ▶ The Tri-parties need to have a larger email listserv. One of the goals of the updated Plan is to “prepare future generations for informed engagement and participation”
 - This will not be done with a listserv of 725. When reviewed 1 year ago, half of the listserv was agency and contractor personnel.
- ▶ Must improve outreach for listserv
 - Cannot rely on email to inform citizens because listserv reaches minimal amount of public.
 - Short term solution—include link to sign up for listserv in the Plan

Exact Language from Superfund Community Involvement Handbook

- ▶ “The CIP (Community Involvement Plan) format should include a cover page that identifies the CIP as an EPA document, and also include information **specifying what EPA will do, not what EPA should do.**”
- ▶ “The Tri-Party agencies strive to...”
 - The above language is used in the Plan repeatedly.
 - This is in opposition to the EPA’s own guidelines of community involvement.
 - EPA **should not** sign on to the Plan if it includes a majority of public involvement language that **does not** describe what EPA and the TPA agencies will actually do.
 - Prescriptive elements will help citizens understand what they must do and **help hold the agencies accountable!**

Updating to Better Public Involvement?

- ▶ The 1990 original plan called for specific meetings in **Spokane, Portland-Vancouver, Yakima, Seattle, and the Tri-Cities**
 - How have updated plans provided for **more** involvement in these communities they identified as key locations in 1990?
- ▶ The new plan calls for meetings in “Key Cities” when significant interest is shown
 - The Plan must define/prescribe a specific process for those who wish to have a meeting/hearing in their hometown.

Public Involvement Evaluation Process

- ▶ Proposed changes limit surveys to **ONLY** those who attend meetings.
- ▶ No longer asking for input from citizens who didn't attend meetings
 - Cuts off what they can do better by not expanding universe of opinions
 - Why was this changed?

Access to information

- ▶ The Plan should **guarantee** comment periods will be extended until ALL records are available for 30 days
- ▶ The Plan should **ensure** the administrative record will be easily searchable for public information.
- ▶ Documents for comment periods should be easily obtained from each agency's website
 - Clearly identify where all documents are retrievable from for the comment period

Response to Public Comments

People will not attend meetings if they repeatedly feel that they have little or no impact. This identifies a major obstacle for participation. As our data helped illustrate, the Hanford Public Involvement Plan should:

- ▶ **Require** that there is a timely written response to comments sent to meeting participants and to those who send in comments
- ▶ The agencies need to demonstrate that they will incorporate the views and comments of the public in real decisions – the public will not be fooled if they see that the decisions are those that they objected to, or if overwhelming public comment for a priority or approach is not adopted.

Public Interest Groups

- ▶ Proposed revision removes 2002 language: “The Tri-Parties also conduct regularly scheduled meetings with public interest group representatives to discuss Hanford Site issues and concerns”
- ▶ This PIP should **retain this language**, and those meetings should be arranged!
 - We did not stop going to these meetings; we were no longer invited.

Updating to Better Public Involvement?

- ▶ The reason for updating the plan is to better public involvement, but there are no new requirements or even things the agencies are “striving” for.
 - There is a clear lack of involvement in Tri-Cities
 - Can survey or study be done to understand why?
 - Other cities are “striving” to have public meetings. At a minimum, the Plan should ensure the public that those who want meetings have meetings!

3. Spokane City Council Resolution

Resolution No. 2011-0090

A resolution of the Spokane City Council in support of public meetings in Spokane regarding the cleanup of the Hanford Nuclear Reservation urging the United States Department of Energy, the Washington Department of Ecology and the U.S. Environmental Protection Agency to hold public meetings in Spokane and increased input from Spokane residents in regard to Hanford.

WHEREAS, Spokane is the most significant population center downwind of the Hanford Nuclear Reservation, which is the most contaminated area in the Western Hemisphere and poses numerous nuclear and chemical waste risks; and

WHEREAS, Spokane faces unique risks from proposals to dispose of tens of thousands of truckloads of radioactive and chemical wastes at Hanford due to routes including Interstate 90 through Spokane in addition to the documented risks to groundwater and the Columbia River from adding more waste to the existing contamination at Hanford; and

WHEREAS, one pending proposal to utilize Hanford to dispose of extremely radioactive wastes with nearly as much radioactivity as in all of Hanford's leaky and dangerous High-Level Nuclear Waste tanks (referred to as Greater Than Class C wastes), and the draft environmental impact statement covering the other proposal acknowledged that groundwater contamination projected from existing wastes, before considering adding even more waste to the soil burden, would exceed health and state cleanup standards for thousands of years; and

WHEREAS, Spokane's economy as well as public health and safety are affected by decisions regarding the timing, level and scope of cleanup at Hanford which have the potential to increase contamination of the Columbia River or groundwater, or which could lead to releases of contamination in the event of fires, earthquakes or accidents; and

WHEREAS, the wastes in the oldest, Single Shell High-Level Nuclear Waste tanks at Hanford would not be completely emptied until the year 2040 under current agreements; and

WHEREAS, the United States Department of Energy (USDOE), which operates the Hanford Nuclear Reservation, the United States Environmental Protection Agency (EPA) and Washington Department of Ecology, which form the Tri-Party Agreement agencies for cleanup at Hanford, have not held regular meetings in Spokane to solicit public input on cleanup decisions; and

WHEREAS, the Tri-Party Agreement Agencies are updating and revising a "Public Involvement Plan" for Hanford Cleanup.

NOW, THEREFORE, be it resolved by the City Council of the City of Spokane as follows:

1. The City formally urges the Tri-Party Agreement agencies to commit to holding public meetings in Spokane on key cleanup decisions for Hanford, and to have at least one annual meeting for public feedback and discussion of public concerns as well as to undertake other efforts to improve notice and involvement for Spokane's residents; and
2. The City of Spokane urges residents to comment on how they wish to be further involved in Hanford Cleanup decisions at a public meeting on November 16, 2011; and
3. The City of Spokane urges the United States Department of Energy to withdraw its two pending proposals to use Hanford as a national radioactive and "mixed" radioactive chemical waste dump and, instead to commit to cleanup efforts which retrieve Plutonium and other wastes from soil sites, cleanup groundwater contamination, and to empty Single Shell Tanks as rapidly as possible to reduce the total potential contamination threats to groundwater from existing wastes in soil or tanks.
4. This Resolution shall be submitted as a formal comment to the Tri-Party Agreement agencies on the proposed revision of the Hanford Cleanup Public Involvement Plan; and, transmitted to Secretary of Energy Steven Chu of the United States Department of Energy, the Governor of Washington State, and the Director of Washington State Department of Ecology.

ADOPTED BY THE CITY COUNCIL ON November 7, 2011



City Clerk

Approved as to form:



Assistant City Attorney



6.0 APPENDIX B – Index of Commenters By Comment(s)

The following list is an index of all commenters, identified by name, and their comments, identified by number. The number in parenthesis is the page number where the comment is located.

Commenter Name	Comment Number
Bill Johns	12 (10), 33 (24)
Bob Apple, Spokane City Council Member	34 (24), 134 (61), 139 (64), 147 (66)
Carol Hiltner, founder, Altai Mir University	132 (60)
Dan Serres, Columbia Riverkeeper	5 (7), 39 (26), 109 (51), 113 (52), 117 (53)
Dan Solitz	16 (12), 120 (57)
Daniel Noonan	121 (57)
Desiree Ashley, Yakima County	54 (32)
Eric Adman, Kenmore, Washington	40 (26), 67 (36), 78 (41) , 88 (43), 92 (45)
Frans Bosman, Mosier, Oregon	136 (61)
Gerry Pollet, Heart of America Northwest	17 (12), 36 (25), 44 (27), 74 (39), 75 (39), 91 (43), 98 (46), 101 (47), 115 (53), 119 (54), 125 (58), 126 (58)
Gordon Smith, Seattle, Washington	58 (34), 123 (57), 131 (60)
Jacinta Heath, student at University of WA	10 (9), 122 (57)
Jack Edwards	135 (61)
Jan Castle, Lake Oswego, Oregon	21 (14), 43 (27), 49 (31), 70 (37), 82 (42), 96 (45), 106 (48), 114 (52), 124 (57)
Jane Civiletti, Oak Grove, Oregon	144 (65)
Jeanne Raymond, Corvallis, Oregon	2 (6), 20 (13)
Jim Kelley	4 (6), 11 (10), 77 (41)
John Howieson, Oregon Physicians for Social Responsibility	14 (11)
John Wood, Hood River, Oregon	41 (26), 65 (36), 81 (41), 86 (42), 90 (43), 95 (45)
Karin Engstrom, Seattle, Washington	9 (8), 23 (14), 61 (34)
Ken Niles, Oregon Department of Energy	6 (7), 19 (13), 25(16), 26 (16), 30 (19), 53 (32), 68 (37), 108 (50), 110 (51)

Commenter Name	Comment Number
Kristina Mageau, Olympia, Washington	7 (8), 76 (40)
Linda Greene, Spokane, Washington	37 (25), 57 (34), 63 (36), 80 (41), 84 (42), 94 (45)
Linda Richards	8 (8)
Lois Duvall, Lake Oswego, Oregon and Faith Ruffing, Portland, Oregon	45 (28), 138 (62)
Liz Mattson, Hanford Challenge	3 (6), 15 (12), 27 (16), 55 (33), 111 (51)
Manita Holtrop	46 (28), 71 (38), 85 (42), 104 (48), 118 (54)
Mark Loper, Heart of America Northwest	29 (19), 93 (45), 97 (45), 100 (46)
Mark Wahl, Langley, Washington	64 (36), 79 (41), 87 (43), 112 (52)
Mike Conlan, Redmond, Washington	134 (61)
Mike McCormick	62 (35), 72 (38)
Nancy Kroening, Phoenix, Arizona	1 (6), 22 (14), 42 (26), 50 (31), 60 (34), 66 (36), 102 (47), 129 (60), 141 (64)
Nancy Stevens	52 (32)
Paul Randall	13 (11), 18 (13), 145 (65)
Roxy Giddings	59 (34), 73 (38), 103 (47)
Russell Jim, Confederated Tribes and Bands of Yakama Nation	28 (16), 31 (20), 69 (37)
Shannon Cram	48 (30)
Sharon Fasnacht, Mediator, Guardian Ad Litem	130 (60), 137 (62), 142 (64), 143 (65)
Spokane City Council	35 (25), 140 (64), 147 (66)
Susan Leckband, Hanford Advisory Board Chair	24 (15), 32 (24), 38 (25), 83 (42), 89 (43), 105 (48), 116 (53)
Sylvia Haven, Seattle, Washington	128 (60)
Tom Carpenter, Hanford Challenge Director	99 (46), 107 (49), 127 (58)
Valerie Pacino	47 (28), 56 (33)