HANFORD ADVISORY BOARD

A Site Specific Advisory Board, Chartered under the Federal Advisory Committee Act

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Dept of Ecology

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Envirolssues Hanford Project Office 713 Jadwin, Suite 3 Richland, WA 99352 Phone: (509) 942-1906 Fax: (509) 942-1926 February 11, 2011

Jonathan Dowell, Acting Director U.S. Department of Energy, Office of River Protection P.O. Box 450 (H6-60) Richland, WA 99352

Matt McCormick, Manager

U.S. Department of Energy, Richland Operations

P.O. Box 550 (A7-50) Richland, WA 99352

Re: Preservation of Historical Properties and Artifacts

Dear Messrs. Dowell and McCormick,

Background

The National Historic Preservation Act (NHPA) of 1966, as amended, states that all federal agencies shall assume responsibility for the preservation of historic properties owned or controlled by them. The Hanford Advisory Board (Board) is concerned that during cleanup of the Hanford Site, many significant historic properties and specific artifacts may have been inadvertently destroyed by U.S. Department of Energy (DOE) project and contractor staff. The preservation of artifacts, historic facilities, and other historically significant items is an important value to the Board.

The NPHA specifically states "...historic properties significant to the Nation's heritage are being lost or substantially altered, often inadvertently, with increasing frequency;" and "...the preservation of this irreplaceable heritage is in the public interest so that its vital legacy of cultural, educational, aesthetic, inspirational, economic, and energy benefits will be maintained and enriched for future generations of Americans." It is DOE's responsibility to preserve and use historical properties and artifacts.

The Board commends DOE's Richland Operations Office (DOE-RL) for recent significant improvements in its preservation actions. These actions include: 1) hiring a federal archaeologist with substantial historical expertise; 2) the decision to permanently preserve B Reactor, and to support making it a unit of the proposed Manhattan Project National Historic Park (including obtaining DOE-HQ support for inclusion of B Reactor in the Park); 3) a recent action to save two original Hanford locomotives and two cask cars from demolition; and 4) the decision to establish a senior staff position, whose duties include

preservation of artifacts. DOE-RL has also increased coordination with other state and federal agencies to help ensure the preservation of properties and artifacts. The Board is encouraged by the increased energy and dedication exhibited by DOE in these and other actions. However, continued and improved actions and new approaches are still needed.

The Board is concerned about the need for assuring that properties, records and associated artifacts that are one-of-a-kind and relevant to Hanford's Manhattan Project and Cold War Era history are properly recognized and evaluated, and that decisions are made to preserve them in accordance with NHPA requirements. To the extent possible artifacts should be collected and displayed. The use of photos, records, and web-based activity is encouraged, however, these should never replace the actual collection and retention of artifacts when practical.

The Board is aware that preservation reviews have recently been or are being made, but with the fast pace of American Reinvestment and Recovery Act activities, the Board is concerned that demolition actions are taking place without careful consideration and action to preserve these significant treasures. Although DOE-RL has developed a good planning approach to save artifacts, it appears the implementation of those plans has been severely lacking. For example, it appears very few if any of the potential artifacts from the 300 Area fuel fabrication and research and development facilities were properly saved. There appears to be a concentrated emphasis on demolition, while neglecting preservation considerations. The Board is hopeful this neglect does not happen during future cleanup activities.

The Board reminds DOE that its contractors are also responsible for preservation of historic properties and artifacts prior to demolition, as set forth in Section 110 (k) of NHPA. It appears this responsibility is either not recognized by, or disseminated to, the contractors. The Board also notes that Section 110 (g) states "Each federal agency may include the costs of preservation activities of such agencies under this Act as eligible project cost in all undertakings of such agency..."

The ultimate purpose of preserving Manhattan Project and Cold War Era historical properties and artifacts is to reap the public values and educational benefits they embody. To recover these benefits, the artifacts and properties need to be regularly viewable by and accessible to educators, researchers, and members of the public to the greatest extent possible. In other words, simply fencing a property and not making it accessible to the public for general interest and educational purposes does not meet the intent of NHPA. These properties include pre-Hanford facilities such as the White Bluffs Bank, Bruggeman Warehouse, 1908 Hanford Irrigation Project Pump House, and Hanford High School, as well as the Manhattan Project and Cold War era properties and artifacts.

Advice

- The Board encourages DOE to continue to pursue its advocacy for preservation
 activities in a coordinated and "energetic and enthusiastic" manner in the future.
 Senior DOE management support is critical to maintain progress. The Board also
 suggests that DOE furnish all prime contractor senior management with a copy of
 this advice.
- The Board encourages DOE to continue to develop increased coordination with state and federal agencies such as the Washington State Historical Preservation Office, the National Park Service, and the U.S. Fish and Wildlife Service.
- The Board advises DOE to notify its contractors of their obligation as set forth in Section 110 (k) of NHPA to factor in the identity of significant Manhattan Project and Cold War Era historical properties and artifacts in their work scope. In addition, the Board advises DOE to direct contractors to include the careful removal of such items and equipment for storage and preservation, and as set forth in Section 110 (g) of NHPA, the cost of taking such actions, in the decontamination and decommissioning or cleanup project cost. The Board advises DOE and its contractors to preserve historic records beyond the requirements of the law.
- The Board advises DOE to continue expanding the use of photos, virtual tours, and web sites, but not at the expense of making actual artifact collections when possible. A photo does not replace an actual artifact.
- The Board advises DOE to centralize Hanford's Manhattan Project and Cold War Era historical artifacts in a facility that is equipped to maintain proper climate and environmental controls, as well as be publicly safe and accessible.
- The Board encourages DOE to consider new approaches to preservation in order to capture the unique design and special features of Hanford buildings in an experiential manner for members of the public. The Board advises that care be taken to preserve elements of buildings planned for demolition that could be used to pass Hanford's history on to future generations. To prepare for an experiential design, elements such as glove boxes, air lock doors, hand and foot counters, respiratory equipment, a hallway with caution signs and decontamination wash stations, emergency switches, racks used in the plutonium vaults, etc. should be considered for preservation. These artifacts could be arranged so that visitors might walk through a replication of the Hanford work environment to enable a fuller picture and better understanding of this unique era of United States history. Features incorporated into such a facility should be decontaminated and/or shielded to ensure the safety of the public.

The Board advises DOE to build on its successful preservation actions for other Hanford buildings that contributed to the Manhattan Project and Cold War Era history. This consideration should extend to pre-Hanford facilities identified in the last paragraph of the background above.

Sincerely,

Susan Leckband, Chair Hanford Advisory Board

This advice represents Board consensus for this specific topic. It should not be taken out of context to extrapolate Board agreement on other subject matters.

cc: Skip Gosling, U.S Department of Energy, Headquarters
Nick Ceto, Co-Deputy Designated Official, U.S. Department of Energy, Richland
Operations Office
Dennis Faulk, U.S. Environmental Protection Agency

Dennis Faulk, U. S. Environmental Protection Agency Jane Hedges, Washington State Department of Ecology Catherine Brennan, U.S. Department of Energy, Headquarters The Oregon and Washington Delegations