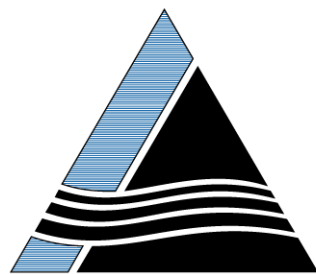


HANFORD TRI-PARTY AGREEMENT COMMUNITY RELATIONS PLAN

Comment and Response Document

January 2002



Tri-Party Agreement

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

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Hanford Tri-Party Agreement Community Relations Plan Comment and Response Document January 2002

WRITTEN COMMENTS

1. Hanford Advisory Board Advice, submitted by Todd Martin, Chair

Comment: Citizen input and participation is vital to any government agency decision-making process. In practice, it is not easy for citizens to become involved in these processes or to influence the outcome of decisions. The Tri-Party Agreement (TPA) Community Relations Plan is more than a legal document that contains requirements for public involvement in Hanford cleanup decisions—it is also a working document that explains to the public how to get involved in these decisions. The Plan, which is currently under revision, is a necessary and useful tool for both the public and the TPA agencies to: 1) explain how and where to get information about Hanford; 2) introduce people who are actively involved in cleanup (including government agencies, tribes, and Hanford Advisory Board (HAB) members); 3) plan and give notice for public involvement activities, and 4) provide mechanisms to evaluate and improve the TPA public involvement process. The HAB requests the incorporation of the following values into any revision of the Plan:

The HAB suggests the Plan be titled, “The Hanford Cleanup Public Involvement Plan.”

Response: The document has been renamed “Hanford Site Tri-Party Agreement Public Involvement Community Relations Plan.”

Comment: The Plan should be updated and maintained to meet the requirements for public involvement under applicable laws such as the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), RCRA (Resource Conservation and Recovery Act), the Model Toxics Control Act (MTCA), and the National Environmental Policy Act (NEPA). The updated Plan should reflect new requirements of MTCA pertaining to public input for site specific risk assessments and ecological risk assessments, and notice and input of public values for future land and resource use.

Response: The Community Relations Plan describes public involvement requirements mandated by the Tri-Party Agreement, which includes the Comprehensive Environmental Response, Compensation and Liability Act and the Resource Conservation and Recovery Act, among many other state and federal environmental laws. The National Environmental Policy Act public involvement requirements will not be included in the Community Relations Plan, however, information on the National Environmental Policy Act is included in Appendix A.

There are numerous regulations that apply to Tri-Party Agreement public involvement activities. The agencies combine and/or coordinate requirements to be as comprehensive as possible. The information in the Community Relations Plan is

designed to reflect this procedure. A section identifying the elements of public notice has been added to the Community Relations Plan, and the information in Appendix A, “Other Laws” has been expanded to identify public involvement aspects of several applicable regulations. (See Page A-1 of the Community Relations Plan.)

Comment: The Plan should clearly state these requirements regarding public notice and planning of public meetings:

Proposed meeting locations and times should be identified to interested citizen groups, Tribes, government entities, including the States of Washington and Oregon, and the HAB forty-five (45) days prior to the proposed meeting whenever possible. Note that certain applicable laws require a forty-five (45) day notification.

Response: The Tri-Parties agree that interested citizens should be consulted, when possible, at least 45 days prior to scheduling any public meeting. One method used to accomplish this is the established Tri-Party Agreement Quarterly Public Involvement Planning meetings where upcoming public involvement opportunities are discussed and the Tri-Parties receive feedback from interested citizens.

Comment: Prior to finalizing meeting or hearing locations, dates and times or the contents of notices for meetings and hearings, the TPA agencies should consult with interested citizen groups, the States of Washington and Oregon, Tribes, and the Public Involvement and Communication Committee of the HAB regarding appropriate dates, times, and locations to avoid schedule conflicts. Also, whenever feasible, either a meeting or a conference call and e-mail should be used to consult with the States of Washington and Oregon, Tribes, Hanford public interest groups and other citizen groups to seek agreement among interested parties on meeting formats and agendas. Meeting planners should seek to include non-TPA agency viewpoints or information to assist citizens in understanding how public values may be impacted by proposed actions of the TPA agencies.

Response: The Tri-Parties strive to collaborate with the interested public in a given location to develop formats and agendas to have the most productive meeting possible. In addition, the Tri-Parties recognize the value of allowing interests outside the Tri-Parties to be a part of the agenda. The following has been revised in the Community Relations Plan, “The Tri-Parties strive to include a wide variety of viewpoints, such as an alternative viewpoint or local perspective, in all Tri-Party Agreement public meetings.”

Comment: The dates, locations, times, agendas and form of notices for public meetings, hearings and comment periods should be established thirty (30) days prior to any meeting or hearing or the start of a comment period. Exceptions should only be made for emergency actions. Thirty-day notice should be provided to interested citizen groups, the States of Washington and Oregon, Tribes, and the Public Involvement and Communication Committee of the HAB.

Response: The following has been added to the Tri-Party Agreement Public Notification Process, “The Tri-Parties will strive to notify stakeholders 30 to 45 days before the start of a public comment period or before a public meeting.”

Comment: Citizens may request a meeting or hearing on cleanup issues. The TPA agencies should hold the meeting, if possible, at the location requested. In addition, following the model provided by MTCA, if ten or more people request a meeting or hearing, the TPA agencies should hold a public meeting in the requested area. If a meeting is not possible, the TPA agencies should work with the group to address their concerns.

Response: Under the various laws governing Hanford cleanup, there are many opportunities for citizens to request public meetings or hearings. After much consideration, the Tri-Parties believe that adding the language of ten or more people requesting a meeting may prove to be more restrictive than what is currently in the Community Relations Plan. The draft Community Relations Plan, dated August 2001 read, “If significant interest is demonstrated, the Tri-Parties will conduct a formal public process.” The Tri-Parties believe the language on public meeting requests is sufficient and no revisions have been made to the Community Relations Plan.

Comment: The HAB believes that public involvement is a two-way process. When citizens provide input on significant Hanford cleanup decisions, they should be responded to in a timely manner by the TPA agencies. HAB advice #92 (March 1999) provides further guidance in this regard: A “Comment and Response” document should be prepared after all TPA comment periods or meetings, and mailed within 60 days to all commenters and others who request the comments and responses. Whenever possible, efforts should be made to allow commenter to clarify their comments or reply to TPA agency responses prior to the decision being finalized.

Response: The Tri-Parties agree that a Comment and Response document should be prepared within 60 days of the end of the public comment period, when possible. If delays occur due to a large volume and/or complexity of comments, interested citizens will be notified by mailer, the *Hanford Update* and/or the Tri-Party Agreement website at <http://www.hanford.gov/tpa/tpahome.htm>. Once the document is finalized, it will be made available to citizens who provided comments and others who request the Comment and Response document. If there are only a few comments made during the public comment period, the agencies may prepare individual letters and/or contact the commenters directly in response to comments.

Comment: To maintain an effective public involvement program, the TPA agencies should assess at least annually the effectiveness of public involvement efforts to identify areas requiring improvement. The results of this assessment should be formally documented in a report for general distribution.

Response: The Tri-Party Agencies agree that an annual evaluation of the effectiveness of public involvement is vital. The section on the annual public involvement evaluation has been expanded to include the procedure, schedule and

requirements of the evaluation. These include conducting the evaluation in the final quarter of each calendar year, evaluating individual activities by using survey cards at meetings, workshops, etc., and requesting feedback on the effectiveness of speakers, presentations and informational materials from the public, environmental interest groups, the Hanford Advisory Board, and Tri-Party Agreement agency staff and management. The annual evaluation process will include compilation of a report that will be distributed to participants and members of the Board and available on the Tri-Party Agreement website. See page 6 of the Community Relations Plan for more information.

Comment: The Plan should say that: the charter of the HAB, as it exists or may be amended, including commitments to funding and the Open Public Meeting Act, is part of the Plan and should be attached as an appendix.

Response: The Hanford Advisory Board charter has been included in the Community Relations Plan as an appendix. (See Page D-1 of the Community Relations Plan.) When applicable, the Tri-Parties comply with the Open Public Meeting Act. However, a description of the Open Public Meeting Act will not be included in the Community Relations Plan.

2. Ken Niles, Oregon Office of Energy

Comment: Thank you for the opportunity to review the August 2001 draft version of the Community Relations Plan. In general, the revision addresses many of the concerns we had expressed about the previous version of the plan. My more specific comments below:

The re-write of the introduction is well done. It provides a nice, logical explanation of the issues, players and process. One element that would be useful to add would be a short explanation of why the public should care to be involved. The four bullets at the bottom of page iv are reasons why the agencies should want the public to be involved, rather than reasons for the public to find a reason to dedicate some of their time and energies toward Hanford cleanup. I suggest adding some language that encourages the public to involve themselves because – at the very least – Hanford poses various environmental hazards and they can help provide input into decisions made about the level and timing of cleanup, and the fact that tremendous amounts of taxpayer dollars are needed for the cleanup.

Response: We agree that the introduction should include more information on why the public should care to be involved. The introduction has been revised to read, “Cleanup at Hanford is one of the nation’s largest environmental challenges, as well as one of the most expensive. Public support for cleanup activities plays a vital role in ensuring that the Hanford Site receives adequate funding to continue progress on cleanup progress. Public participation in the decision-making process results in better decision-making and more sustainable decisions.”

Comment: Page iii, 1st paragraph under “Who’s Who at Hanford?” 5th line. There is an extra “of the” which should be deleted.

Response: The extra “of the” has been removed from the “Who’s Who at Hanford?” section of the Community Relations Plan.

Comment: Page 1, “Hanford Cleanup Line.” The second sentence says that Ecology “monitors” all calls. That term could be misunderstood.

Response: The “Hanford Cleanup Line,” section will now read, “Ecology personnel answer all calls and forward requests for information to the appropriate Tri-Party agency.”

Comment: Page 2, “Fact and Focus Sheets.” Add a potential topic for fact or focus sheets – a summary of an Environmental Impact Statement or similar, technically detailed documents.

Response: A summary of a Tri-Party Agreement proposed change package is included as an example in the “Fact and Focus Sheets” section of the Community Relations Plan. (See page 2 of the Community Relations Plan.)

Comment: Page 3 and throughout – various “headings” and “subheadings.” These are somewhat confusing. If you look at Page 3, the Heading says “Public Involvement Opportunities.” The following page has a Heading of the same typeface and size that reads “Tri-Party Agreement Public Meetings.” What this seems to indicate is that the ONLY public involvement opportunity is the public comment period related to TPA documents, when in reality, many of the items to follow are public involvement opportunities.

Response: The headings and subheadings have been reformatted to indicate the various types of Tri-Party Agreement public involvement opportunities at Hanford.

Comment: Page 4, 1st column, 3rd full paragraph. Referencing that EPA follows requirements set forth in the Freedom of Information Act, without giving even a brief summary of these requirements, is not sufficient. A sentence or two should be added to briefly summarize the requirements.

Response: More detailed information on the Freedom of Information Act has been included in Appendix A, “Other Laws” section of the Community Relations Plan. Additional information on DOE’s requirements for the Freedom of Information Act and Ecology’s Public Disclosure Law have been included in the Community Relations Plan. (See page A-1 of the Community Relations Plan.)

Comment: Page 4, 2nd column, 2nd full paragraph. The “State of Oregon” or “the Oregon Office of Energy” should be specifically listed as an entity with which the Tri-Parties consult regarding the need for public meetings. In this case, it is not sufficient to list us as merely a stakeholder. There should also be mention somewhere in this section of discussions with Oregon about any Tri-Party public information activities in Oregon. As we mentioned in an earlier conversation with Dennis Faulk, we’re not trying to convey that permission is needed, rather that consultation occurs prior to any public involvement activities in Oregon.

Response: The Tri-Parties agree to include in the text of the Community Relations Plan the “State of Oregon” as an entity to be consulted with when public participation activities will be conducted in Oregon.

Comment: Page 6, 2nd column, long paragraph on evaluation. Parts of this paragraph are still generic in nature and we would like to see a few more specifics. We appreciate the text at the end of the paragraph listing the issues, which will be covered in the evaluation report. The beginning though, just talks in general terms about evaluating the “overall effectiveness” of public involvement activities. We would like to see a few more specifics added here, such as the quality of written materials and oral presentations, the adequacy of comment periods, the adequacy of meeting formats and notices, and the adequacy of meeting facilities.

Response: The Tri-Parties agree that the specifics of the evaluation need to be spelled out; however, the text in the rest of the Community Relations Plan identifies what constitutes effective public involvement. (See page 6 of the Community Relations Plan.)

Comment: Page 8, 1st column, 2nd full paragraph. I believe the Public Involvement and Communication Committee has the same “standing” as other HAB committees.

Response: The Public Involvement Committee has elected to maintain its status as non-standing committee.

Comment: Page 8, 1st column, 3rd full paragraph. The information in this paragraph should be incorporated into the 1st paragraph on the HAB on page 7.

Response: The information on the Hanford Advisory Board committees has been moved to the first paragraph on page 8 of the Community Relations Plan.

Comment: Page 8, 1st and 2nd column. List of bullets and following paragraph. All of this can be deleted. It is redundant with information in the first full paragraph on page 8.

Response: The list of bullets and following paragraph have been removed from page 8 of the Community Relations Plan. In addition, the Hanford Advisory Board charter has been included in the Community Relations Plan as an appendix. (see Page D-1 of the Community Relations Plan.)

Comment: Page 9, 1st column, “Oregon Office of Energy” listing. The third sentence begins “Oregon office staff...” Delete the word “office” so it reads “Oregon staff...”

Response: The word “office” has been deleted.

Comment: Pages 12, 13 and 15. The flow charts on these pages are much easier to read than in previous drafts of this document.

Response: Thank you for your comments on the flow charts.

Comment: Page 14, 1st column, 2nd full paragraph, 2nd sentence, begins, “In general, Ecology...”. This sentence is redundant with other information on this page and should be deleted.

Response: The sentence has been taken out of the second full paragraph on page 14 of the Community Relations Plan.

Comment: Page 15, 1st column, 1st paragraph under “Expedited Response Actions.” In the second sentence, add the word “sometimes” so it reads: “...Expedited Response Actions are sometimes being used where...” The reason I offer this qualifier is that there are some issues such as tanks, which both present a threat and would be cheaper not to put off, but yet Expedited Response Actions are not used.

Response: Within Section 2 of the Community Relations Plan, the Expedited Response Actions will include a sentence that says, “...Expedited Response Actions are sometimes being used where...”

Comment: Page 21, 2nd column, 1st paragraph. Add some language to indicate that some of these plumes do reach the Columbia River.

Response: Within Section 3 of the Community Relations Plan, a sentence has been added to the 100 Area section that reads, “Some of the waste has reached groundwater, which ultimately flows into the Columbia River.”

Comment: Page 21, 2nd column, 1st full paragraph, 16th line. The ten million cubic yards of soil mentioned here. Is that total, or in addition to what has already been removed?

Response: The sentence has been revised to read, “...and involve removing an estimated 10 million tons of waste from 100 and 300 Area remediation.”

Comment: Page 24, 2nd column, paragraph under “ERDF,” last sentence. Text on page 21 says ten million cubic yards of soil will be removed during cleanup. Page 24 says seven million will be placed at ERDF. Although the reference on page 21 doesn’t say all of this will be sent to ERDF, because ERDF is discussed in the previous few sentences, that is the implication. Therefore, these two numbers are not consistent.

Response: The sentence has been revised to read “...deposited in the Environmental Restoration Disposal Facility is expected to be at least 10 million tons as cleanup progresses.”

Comment: Page 26, 2nd column, last paragraph. Since we’re always trying to distance commercial activities from Hanford activities, the information at the start of this paragraph about the WPPSS construction should be deleted, or should be rewritten to clearly indicate this was not directly associated with Hanford.

Response: The information about the Washington Public Power Supply System has been removed from Tri-Cities Area Community Background.

Comment: Page A-1, “The Clean Water Act.” The last sentence says “permit processes” include requirements for public involvement and comment. A couple of explanatory sentences should be added to briefly describe these requirements.

Response: The Clean Water Act section of Appendix A has been expanded to describe elements of the state’s public involvement requirements. See page A-1 of the Community Relations Plan.

Comment: Page A-1, “The Clean Air Act.” There should be a couple of sentences added which briefly describe the public involvement requirements under this Act.

Response: The Clean Air Act section of Appendix A has been expanded to describe elements of the state’s public involvement requirements. See page A-1 of the Community Relations Plan.

Comment: Page A-1, “State Environmental Policy Act.” There should be a couple of sentences added which briefly describe the public involvement requirements under SEPA.

Response: The State Environmental Policy Act section of Appendix A has been expanded to describe elements of the SEPA public involvement requirements. See page A-1 of the Community Relations Plan.

Comment: Page E-5, definition for “Basalt Waste Isolation Pilot Project.” The definition should include mention that this project was discontinued in the late 1980s.

Response: The definition for the Basalt Waste Isolation Pilot Project will include a sentence that says, “This project was discontinued in the late 1980s.”

Comment: Page E-7, definition for “curie.” The second sentence does not make sense as it is written.

Response: The second sentence in the definition has been removed.

Comment: Page E-9, definition for “Fast Flux Test Facility.” Given that its status is still up in the air, it is difficult to advise what to say here, but the current definition given is no longer accurate in that it implies the reactor is still operating.

Response: The definition has been revised to say, “The Fast Flux Test Facility (FFTF) is a 400-megawatt (thermal) liquid-metal (sodium) cooled fast neutron flux nuclear test reactor owned by the U.S. Department of Energy (DOE). The facility is located in the 400 Area of the Hanford Site. FFTF was completed in 1978 and initial operation began in 1980. From April 1982 to April 1992, the FFTF operated as a

national research facility to test advanced nuclear fuels, materials, components, nuclear power plant operations and maintenance protocols, and reactor safety designs. The U.S. Department of Energy announced in December 2001 that the reactor will not be restarted and the Department will proceed with facility deactivation.”

Comment: Page E-9, definition for “Final Disposition of the Reactors.” The definition should include some indication that removal of the reactor cores to the 200 Area is not planned to occur for about 75 years.

Response: The sentence has been revised to read, “Final disposition of the reactors will consist of removing the reactor cores from their present location at or before the end of the 75-year safe storage period to a disposal...” And, the following sentence at the end “DOE’s schedule for this activity has been included in an engineering evaluation/cost analysis due to the regulators in September 2005.

Comment: Page E-10 and E-14, definition for “Hanford formation” and “Ringold formation.” The use of the word “this” at the beginning of the second sentence for both definitions is confusing. It would be clearer to say “The Hanford formation is the uppermost...” and “The Ringold formation is the second layer...” The definitions also raise question of what the bottom layer is called.

Response: Within the Acronym List and Glossary, the Hanford formation definition the following sentences has been added, “The second layer, Ringold formation, consists of layers of silt, gravel and sand. The deepest level is a thick series of basalt flows that have been warped and folded and crop out as rock ridges in some places.”

The Ringold formation definition will contain the following additional sentences. “The uppermost level is know as the Hanford formation and consists of gravel and sands deposited by catastrophic floods. The deepest level is a thick series of basalt flows that have been warped and folded and crop out as rock ridges in some places.”

Comment: Page E-10 and E-11. There is not sufficient space between a couple of the definitions.

Response: The spacing between the definitions has been changed.

3. Heart of America Northwest

Comment: In 1996, USDOE, Ecology and EPA responded positively in agreement with our comments urging that the Community Relations Plan (CRP) clearly define adequate notice. Our comments defined adequate notice as, “Notice must be provided in a manner that a reasonable person who desired to know about a meeting, the key issues, and how the decisions may affect their interests, would know of the meeting, understand the issue and decisions. Notice must

include adequate information to allow this reasonable person to comment in a timely manner regarding their interests in pending decisions.”

The agencies response was, “This principle is fundamental to the CRP and is stated in many areas of the document. The agencies admit that in the past our printed materials have sometimes been difficult to understand. We are committed to working with interested citizens to improve the readability of our written material.” (Agencies’ Response to Heart of America Northwest comments, September 4, 1996, Response to Item 1 of Notice issues).

Although the TPA agencies agreed with this principle, it was not written into the CRP anywhere, and has not been used to evaluate adequacy of notices and materials, nor even used as the guiding requirement provided to those creating draft notices.

Notice Addition to CRP Item 1: This principle must now be specifically written into the CRP as a formal binding commitment for all notices and as the basis for evaluating the adequacy of notices (using the language in first indented paragraph above).

Response: The agencies agree that adequate and effective notice must be provided so that members of the public have the opportunity to become involved in issues. The procedures by which the agencies commit to providing notice are identified in the Community Relations Plan. Additionally, a new section has been added called “Effective Public Notice,” which describes the elements that will be included in public notices. See page 6 of the Community Relations Plan.

Comment: Notices over the past five years have more often than not failed to be based upon this principle. This principle is now embodied in the new MTCA regulations as requirements to provide notices when a cleanup plan will result in restrictions on land and resource uses:

Notice of proposed use restrictions, proposed institutional controls, and impacts to public values identified from such comments shall be a prominent feature of public notices and public information materials to solicit public comment on specific RI/FS (Remedial Investigation/Feasibility Study), RCRA remedial action plans, five-year reviews, proposed orders or decrees, and site specific risk assessments. See (Washington Administrative Code) WAC 173-340-600(4)(g) and (9)(e). An inventory of public concerns that may be impacted is a required element of public participation plans, and should be identified as part of this Community Relations Plan. WAC 173-340-600 (4)(g); and, WAC 173-340-600 (9)(g) and (e). All Hanford cleanup plans are now relying on Site-Specific Risk Assessments; and, current USDOE baselines and proposals involve use restrictions (even for the 100 Area, use restrictions are part of the plans for an undetermined period of remediation and pending groundwater remediation.)

The Model Toxics Control Act now requires that all notices for cleanup plans (i.e.: proposed Records of Decisions, RI/FS, EE/CAs (Engineering Evaluation/Cost Analysis), TPA modifications regarding these) using site-specific risk assessment or which would restrict future site or resource use “shall specifically identify the restrictions and invite comments on these elements of the cleanup plan.” WAC 173-340-600(4)(g).

Notice Addition to CRP Item 2: Therefore: the Community Relations Plan should now clearly define adequate notice for any plans that may affect resource or site use, or which rely on Site-Specific Risk Assessments, as: Adequate notice of any plan or decision that may impact public values for site or resource use shall specifically identify the site or resource uses that may be restricted from the pending decision. Adequate notice of any plan or decision that relies upon site specific risk assessments shall specifically identify what significant public values or concerns regarding exposure were varied and how the public may obtain information and assistance in commenting. Public meetings or hearings on such plans will specifically address these impacts. This must be added to the CRP's definition of adequate notice, and be a formal part of the evaluation criteria.

Response: The following sentence has been added to the “Effective Public Notice” section of the Community Relations Plan, “In the event that a cleanup plan uses a site-specific risk assessment that would restrict future site use, the public notice will identify potential restrictions and other applicable requirements.”

Comment: Notice Addition to CRP Item 3: This CRP should include a specific timeline and plan for creating that inventory of significant public concerns regarding future site and resource use that will guide public notices. This should be a commitment in the CRP, to result in an appendix to the CRP, when the agencies conclude the proposed process on public inputs to exposure scenarios and risk assessments.

Response: The Tri-Parties believe this inventory of significant public concerns regarding future site and resource use already exists and has been used to guide cleanup. Major efforts to elicit public values began with the Future Site Uses Working Group and carry forward today with the Hanford Advisory Board. We do not believe it is necessary to repeat these values in an appendix to the Community Relations Plan.

Comment: In 1996, we commented, “Notice must be designed by someone actually desirous of giving effective notice. EPA and Ecology should hire professionals to prepare notices and information to support the notices.” The agencies responded, “As discussed in a previous response, it is the intent of the agencies to provide clear and meaningful printed material. The agencies agree that readability and visual interest of notices needs to be improved. USDOE is considering using professional ad writers to improve notices.” This commitment has not been met. Notices and materials supporting notices continue to fail to meet the definition of meaningful and adequate notice. Significant improvements in ads and notices have only occurred when there has been significant interaction with public interest groups and much negotiation between the TPA agencies. More often than not, there are prolonged disputes over the exclusion of key issues of interest to the public and the use of terms and visuals that would provide notice to the public of how a pending decision will affect their interest and public values.

The notices for the public meetings on this Community Relations Plan provide a clear-cut example. Professionally prepared ads were not initiated, and adequate ads were only prepared after public interest groups objected to the lack of notice. USDOE sought to place an ad for the

Seattle hearing in the classified section – which is not notice provided in a manner that a person who reasonably desires to know of the Community Relations Plan revisions would be expected to receive notice. Indeed, no one who attended saw the classified ad. Nor was the ad designed in a manner to reasonably inform someone with concerns about public involvement about how the changes may affect their interests in receiving future notices or how meetings were conducted.

Response: The Tri-Parties agree that effective public notices are a crucial component of attracting public interest and involvement in Hanford cleanup issues. The agencies employ trained communications and/or graphics staff members to draft and design these notices. Additionally, we do not agree that employing an outside agency to develop these materials would reduce costs, since the Tri-Party Agreement requires that all materials bearing the Tri-Party Agreement logo must be reviewed and approved by all three agencies prior to publication. Therefore, the agencies feel that using outside resources would increase the amount of time and money spent on developing public notices, and we will not make a change in the Community Relations Plan. However, the agencies agree to continue working with interested stakeholders to ensure that public notices and other materials are written in reader-friendly language that explains the issues and provides appropriate information on opportunities for the public should get involved. (See page 6 of the Community Relations Plan.)

Notice Addition to CRP Item 4: It is also vital that the CRP specify that: If a NEPA decision will be relied upon for TPA purposes (including for scheduling, prioritizing, or deleting milestones; as the informational basis for a Record of Decision; or, for RCRA permitting), the notice for the NEPA public comment period and decision must meet the requirements of the CRP for adequate notice. If State decisions requiring compliance with the State Environmental Policy Act (SEPA) will require use of information or comments generated from such NEPA documents, Washington State agencies will not recognize the USDOE's NEPA documentation as meeting the requirements of SEPA unless the notice and other public involvement requirements of this CRP have been followed.

Response: Notice requirements for public involvement on a National Environmental Policy Act decision are in 40 CFR 1500 through 1508 and 10 CFR 1021. When appropriate, USDOE integrates the NEPA and CERCLA public participation processes, including notices to the public about a pending cleanup action or decision. However, sometimes the actions of the DOE require an independent implementation of NEPA. When this is the case, the public participation notice requirements of NEPA are followed. Great strides are taken within DOE to advise site and headquarter offices of the most effective way to conduct public involvement activities in the region.

The State of Washington has specific regulations guiding decisions made under the State Environmental Policy Act and these regulations will continue to be the basis for determining whether the state will accept findings from a National Environmental Policy Act process. In the event that findings under the National Environmental Policy Act and/or the State Environmental Policy Act result in

proposed changes to the Tri-Party Agreement, the guidelines of the Community Relations Plan will be followed for the Tri-Party Agreement public process.

Comment: Three times in the past year, USDOE-RL has issued proposed NEPA decisions and Environmental Assessments of significant public concern with no meaningful notice at all. For the proposed Finding of No Significant Impact and Draft Environmental Assessment (EA) on USDOE's proposed expansion of the Hanford Low-Level Burial Grounds to add unlined trenches that would accommodate 3.5 million cubic feet of Low-Level Waste, USDOE's public mailing list for the combined notice and draft EA had a total of three people. Twice more this year, USDOE again provided notice of EAs and Finding of No Significant Impact (FONSI) to a list of just three persons. USDOE provided no other notice and made no effort to hold public meetings on these controversial decisions. However, each of these EAs and FONSI would have tremendous impacts on Tri-Party Agreement activities and priorities.

Little has changed since we were informed that USDOE's ad and materials drafter(s) was not allowed to use include references to: explosion risks, burial, dumpsites, leaks, releases, etc... These were terms that USDOE and its prime Hanford contractor barred their subcontractor or staffs from using, even when NEPA was triggered by explicit findings of potential explosion or leak risks or burial of wastes.

Notice Addition to CRP Item 5: It is now time for the CRP to be amended to specify that, "Notices will be created by an outside professional party other than the staff or contractors of USDOE (the Potentially Liable Party), who are not subject to pressures and restrictions against providing the public with notice of how controversial decisions may affect their interests. This outside party should consult with public interest groups to be sure notices are appropriate for the meeting content and location. The adequacy of notices and materials created by this party shall be subject to annual evaluation (by all three agencies and the Hanford Advisory Board) as described in the evaluation section of the CRP, and their contract shall direct them to develop notices that meet the basic definition of the adequate notice.

Not only will this action increase public involvement and awareness (and hence, public support for cleanup funding and progress), but it will lower costs by avoiding the prolonged transaction costs imposed on agencies whose staffs now haggle over the wording of notices and mailings.

Response: The Tri-Parties agree that effective public notices are a crucial component of attracting public interest and involvement in Hanford cleanup issues. The agencies employ trained communications and/or graphics staff members to draft and design these notices. Additionally, we do not agree that employing an outside agency to develop these materials would reduce costs, since the Tri-Party Agreement requires that all materials bearing the Tri-Party Agreement logo must be reviewed and approved by all three agencies prior to publication. Therefore, the agencies feel that using outside resources would increase the amount of time and money spent on developing public notices, and we will not make a change in the Community Relations Plan.

However, the agencies agree to continue working with interested stakeholders to ensure that public notices and other materials are written in reader-friendly language that explains the issues and provides appropriate information on opportunities for the public should get involved. (See page 6 of the Community Relations Plan.) For more information regarding the revised language to the Tri-Party Agreement Public Notification section of the Community Relations Plan, see page 11 of this document.

Comment: Proposed language to incorporate MTCA and NEPA requirements into (the) Community Relations Plan: We have had extensive conversations with USDOE, Ecology and EPA about the importance of integrating public involvement requirements of environmental laws used at the Hanford Site, specifically the Washington Model Toxics Control Act and the National Environmental Policy Act. In order to have one unified, legal public involvement plan, language must be incorporated that makes reference to these laws and how they apply to Hanford cleanup decisions.

Legal Requirement Addition to CRP Item 1: This Community Relations Plan shall be updated and maintained to meet the requirements of Washington's Model Toxics Control Act, (MTCA) RCW 70.105D and the regulations implementing that Act (WAC Chapter 173-340) for a site specific public participation plan, to be applied to: each operable unit or RI/FS; annual evaluation of public participation; public input for site-specific risk assessments and ecological risk assessments; and, notice and input of public values to alternate reasonable maximum exposure scenarios, or the proposed use of institutional controls. As such, this plan is a formal part of the HFFACO, pursuant to WAC 173-340-600(9)(f). MTCA requires that adequate public participation and notice, pursuant to this plan, for Ecology to approve the use of Site-Specific Risk Assessments and modifications of default values, including as ARARs (Applicable or Relevant and Appropriate Requirement).

Response: The Community Relations Plan includes the public involvement requirements mandated by the Tri-Party Agreement, which includes the Comprehensive Environmental Response, Compensation and Liability Act and the Resource Conservation and Recovery Act, among many other state and federal environmental laws. The National Environmental Policy Act public involvement requirements will not be included in the Community Relations Plan.

There are numerous regulations that apply to Tri-Party Agreement public involvement activities. The agencies combine and/or coordinate requirements to be as comprehensive as possible. The information in the Community Relations Plan is designed to reflect this procedure. The National Environmental Policy Act public involvement requirements are located in 40 CFR 1500 through 1508 and 10 CFR 1021. A description of NEPA will be included in the "Other Laws" in Appendix A. (See page A-1 of the Community Relations Plan.)

Comment: Because this new MTCA regulation requires adequate public notice, a thorough, well-defined public involvement process will be required. Ecology and EPA will use the following forums and comments to determine if public concerns regarding future land uses,

restrictions on resource use, potential for exposure, and reasonableness of assumptions in maximum reasonable exposure scenarios or alternative maximum reasonable exposure scenarios are impacted, including whether an alternate reasonable maximum exposure scenario or institutional control is consistent with public values; and, determining the appropriateness of any values or assumptions proposed to be substituted for default values for risk assessment purposes:

- comments at annual budget priorities meetings, a record of which shall be kept for this purpose and to ensure appropriate responses to comments;
- the Hanford Future Site Use Working Group Report;
- comments provided during NEPA and SEPA processes, including scoping, on relevant proposals;
- formal advice and other input from the Hanford Advisory Board, the Oregon Hanford Waste Board, and from processes or advisory boards serving the Hanford Reach National Monument;
- comments on prior RI/FS or RCRA documents.

These comments will be considered in addition to those submitted on a specific: RI/FS; RCRA (OU) Operable Unit remedial action plan; proposed order, consent decree or changes to orders or decrees; risk assessment; or, on five-year reviews or the effectiveness of remedial actions. See WAC 173-340-600(9)(e).

Legal Requirement Addition to CRP Item 2: The CRP should include specific public involvement activities and processes whereby the public can express concerns regarding future land uses, restrictions on resource use, and adequacy of exposure scenarios or institutional controls, consistent with the new MTCA requirements listed in Item 1. (For more language concerning appropriate notice for any plans that may affect resource or site use, please see our comments on Adequate Notice.)

Response: The Community Relations Plan includes the public involvement requirements mandated by the Tri-Party Agreement, which includes the Comprehensive Environmental Response, Compensation and Liability Act and the Resource Conservation and Recovery Act, among many other state and federal environmental laws.

There are numerous regulations that apply to Tri-Party Agreement public involvement activities. The agencies combine and/or coordinate requirements to be as comprehensive as possible. The information in the Community Relations Plan is designed to reflect this procedure. A section identifying the elements of public notice has been added to the Plan, and the information in Appendix A, “Other Laws” has been expanded to identify public involvement aspects of other regulations. (See page A-1 of the Community Relations Plan.)

Comment: Legal Requirement Addition to CRP Item 3: It is also vital that the CRP specify that: If a NEPA decision will be relied upon for TPA purposes (including for scheduling, prioritizing, or deleting milestones; as the informational basis for a RoD (Record of Decision); or, for RCRA permitting), the notice of the NEPA comment period and decision and documents

such as Environmental Impact Statements (EIS), must meet the requirements of the CRP for notice, meetings and distribution.

Response: The National Environmental Policy Act public involvement follows the requirements in 40 CFR 1500-1508 and 10 CFR 1021.

Comment: If the State decisions requiring compliance with the State Environmental Policy Act (SEPA) will require use of information or comments generated from such NEPA documents, Washington State agencies will not recognize the USDOE's NEPA documentation as meeting the requirements of SEPA unless the notice and other public involvement requirements of this CRP have been followed.

Response: The State of Washington has specific regulations guiding decisions made under the State Environmental Policy Act and these regulations will continue to be the basis for determining whether the state will accept findings from a National Environmental Policy Act process. In the event that findings under the National Environmental Policy Act and/or the State Environmental Policy Act result in proposed changes to the Tri-Party Agreement, the guidelines of the Community Relations Plan will be followed for the Tri-Party Agreement public process.

Comment: Three times in the past year, USDOE-RL has issued proposed NEPA decisions and Environmental Assessments on issues of significant public concern with no meaningful notice at all. For the proposed Finding of No Significant Impact and Draft Environmental Assessment (EA) on USDOE's proposed expansion of Hanford Low-Level Burial Grounds to add unlined trenches that would accommodate 3.5 million cubic feet of Low-Level Waste, USDOE's public mailing list for the combined notice and draft EA had a total of three people. Twice more this year, USDOE again provided notice of EAs and Finding of No Significant Impact (FONSI) to a list of just three persons. USDOE provided no other notice and made no effort to hold public meetings on these controversial decisions. However, each of these EAs and FONSI would have tremendous impacts on Tri-Party Agreement activities and priorities.

It is essential that citizens be as involved in NEPA decisions at the Hanford Site as they are with decisions made under RCRA and CERCLA. This requires coordination of the Tri-Party Agreement public involvement staff with those writing and reviewing NEPA decisions documents and setting comment periods. The mailing list used by the Tri-Parties for notice should be used to inform citizens of NEPA decisions and Environmental Assessments on issues of significant public concern, as mentioned above.

Public Meeting Notice and Timeline Defined: Many citizens who attended the public meetings on the Community Relations Plan had horror stories to share of public meetings gone array, especially those done under the NEPA process. In order to make the public process more meaningful and productive for both citizens and the Tri-Party Agencies, we suggest these additions.

Public Meetings Addition to CRP Item 1: Proposed meeting locations and times shall be identified to interested citizen groups, Tribes, governmental entities, including the State of Oregon, and the Hanford Advisory Board forty-five (45) days prior to the proposed meeting.

Response: The Tri-Parties agree that interested citizens should be consulted, when possible, at least 45 days prior to scheduling any public meeting. One method used to accomplish this is the established Tri-Party Agreement Quarterly Public Involvement Planning meetings to discuss upcoming public involvement opportunities and receive feedback from interested citizens.

Comment: Public Meetings Addition to CRP Item 2: Prior to finalizing meeting or hearing locations, dates and times for meetings and hearings, the agencies shall consult with interested citizen groups, the State of Oregon, Tribes, and the Public Involvement Committee of the Hanford Advisory Board regarding appropriate dates, times, locations, avoidance of conflicts and agendas.

Response: The following has been added to the Community Relations Plan, “Tri-Parties strive to collaborate with the interested public in a given location to develop the formats and agendas to have the most productive meeting possible. In addition, the Community Relations Plan recognizes the value of allowing interests outside the Tri-Parties to be a part of the agenda.”

Comment: The dates, locations, times, agendas, and form of notices for public meetings, hearing and comment periods shall be established, with notice to all parties required to be consulted in Item 1, thirty (30) days prior to any meeting or hearing or the start of a comment period. Exceptions may only be made for emergency actions. In the current draft of the CRP up for comment, the requirement for an alternative viewpoint at public meetings has been removed. We insist that this right be reinstated in the CRP.

Response: The following has been added to the Tri-Party Agreement Public Notification Process, “The Tri-Parties will strive to notify stakeholders 30 to 45 days before the start of a public comment period or before a public meeting.”

Comment: Public Meetings Addition to CRP Item 3: An alternative viewpoint to assist citizens in understanding how public values may be impacted by proposed actions of the agencies will be included in the meeting agenda.

Response: The following has been revised in the Community Relations Plan, “The Tri-Parties strive to include a wide variety of viewpoints, such as an alternative viewpoint or local perspective, in all Tri-Party Agreement public meetings.”

Comment: Public Meetings addition to CRP Item 4: If ten or more unrelated persons or a public interest group request a meeting or hearing during a comment period, the agencies shall hold a public meeting in the requested area. As part of the early consultation process, the agencies shall consult with citizen groups regarding whether they believe a meeting is warranted or required on behalf of ten or more of their members.

Just this past March, USDOE tried to refuse a request of a citizen group to hold a meeting on Hanford Budget Priorities in Hood River, OR. The meeting did end up taking place and had a great turnout – one of the largest in the region. By adding language that specifies numbers of people, a “significant” number becomes legally defined. This ensures that whenever a “significant” number of people desire a meeting, their request will not be denied.

Response: Under the various laws governing Hanford cleanup, there are many opportunities for citizens to request public meetings or hearings. After much consideration, the Tri-Parties believe that adding the language of ten or more people requesting a meeting may prove to be more restrictive than what is currently in the Community Relations Plan. The draft Community Relations Plan, dated August 2001, currently reads, “If significant interest is demonstrated, the Tri-Parties will conduct a formal public process.” The Tri-Parties believe the language on public meeting requests is sufficient and no revisions will be made to the Community Relations Plan.

Comment: Comment and Responses Defined: Although response to comments was the last discussion item on the agenda at the Community Relations Plan Public Meetings in October, it was perhaps the most widely discussed topic. Many citizens expressed distrust that their comments had been taken into consideration in past decision-making processes. Others had asked specifically for response to their comments at a meeting or via mail and had never received an answer. If a member of the public is to take the time to go to public meetings and send in comments, each person is entitled to a response, preferably before a decision has been made, so as to know if and why his/her comment was or was not incorporated in the decision. After years of secrecy and denial, the USDOE has a responsibility to be accountable to the needs and concerns of those who are affected by its policies.

The Tri-Party Agency representatives at these meetings were very interested in improving this part of the process and incorporating these ideas into the CRP. Here are our specific suggestions regarding response to comments:

Response to Comment Addition to CRP Item 1: A Response to Comment document will be prepared prior to the decision on all TPA comment periods or meetings, and mailed within 60 days to all commenters and persons requesting the comments and responses. Efforts will be made to allow for commenters to clarify their comments or respond to agency responses prior to the decision being finalized. When comments are summarized or grouped, the response document will identify where a commenter will find a response to their individual comments, if unique materials or perspective were offered, and an index will direct readers to specific comments and responses.

Response: The Tri-Parties agree that a Comment and Response document should be prepared within 60 days of the end of the public comment period, when possible. If delays occur due to a large volume and/or complexity of comments, interested citizens will be notified by mailer, the *Hanford Update* and/or the Tri-Party Agreement website at <http://www.hanford.gov/tpa/tpahome.htm>. Once the document is finalized, it will be made available to citizens who provided comments

and others who request the Comment and Response document. If there are only a few comments made during a public comment period, the agencies may prepare individual letters and/or contact the commenters directly in response to comments.

Comment: Many of our members expressed concern that comments given at meetings were not given to the managers making the decisions.

Response to Comment addition to CRP Item 2: Therefore: the CRP shall state that the comment and response document shall be transmitted to each agencies' decision maker(s) for the pending action prior to approval or action being finalized.

Response: The Tri-Parties transmit Comment and Response documents to their decision-makers for the pending action prior to approval or action being finalized.

Comment: Openness/Access to Records: Due to past troubles of organizations and citizens not receiving documents relating to a specific decision at Hanford in a timely manner, the CRP should contain language requiring that such documents be made available.

Openness Addition to CRP Item 1: Records and info relied upon for proposed decisions, or relevant to informal comment on proposed decisions or comment periods, shall be available upon request, including requests submitted under the Freedom of Information Act, in a timely manner prior to the end of the relevant comment period. If requested public records/relevant information is not provided prior to the end of the comment period, when a request has been submitted at least 10 days prior to the end of the comment period, the comment period shall be extended for a time period no less than fourteen days after the requested records have been provided.

Response: More detailed information on the Freedom of Information Act is included into the "Other Laws" section of the Community Relations Plan. Additional information has been included on DOE's requirements for the Freedom of Information Act and Ecology's Public Disclosure Law. (See page A-1 of the Community Relations Plan.)

In addition, information has been revised in the Community Relations Plan under the public comment period section to read, "When requested, the Tri-Parties will consider extending a public comment period."

Comment: Openness Addition to CRP Item 2: If the requested materials are not provided by USDOE for informal comment on proposed decisions or comment period, USDOE should be penalized by the regulators. For instance, if USDOE does not provide information requested about hazards of PFP cleanup during the comment period, Ecology and EPA should enforce penalties.

Response: Tri-Party Agreement information requests are governed under Section 9 of the Hanford Tri-Party Agreement Action Plan. If DOE fails to comply with the requirements set forth in Section 9, EPA and Ecology may invoke the enforcement provisions in the Tri-Party Agreement.

Comment: Other Suggested Changes to the Community Relations Plan:

The Hanford Advisory Board Charter should be put back into the CRP (it has been removed from the draft).

Response: The Hanford Advisory Board Charter has been included in the Community Relations Plan as an appendix. (See page D-1 of the Community Relations Plan.)

Comment: Annual Budget Meetings: For page 4 requirement of public meeting in spring on budget priorities per TPA paragraphs 148 and 149: add: three to five public meetings will be held around the Northwest. In advance of the meetings, USDOE shall provide to EPA, Ecology, the public and the Hanford Advisory Board a proposed prioritization of cleanup expenditures for the next two fiscal years that has detail of expenses at the ADS (Activity Data Sheets) level, has an attached short description of what activities or purchases are included in the proposed budget line, shows whether the budget line is required for essential safety or to comply with legal mandates, clearly identifies what activities required by the TPA, CERCLA, and RCRA would not receive full funding, and covers all baselines, including indirect overhead costs.

Response: The language in the current Community Relations Plan is compliant with the current version of the Tri-Party Agreement paragraphs 148 and 149, however, the Tri-Parties welcome input on the budget public meetings. Each year, the Tri-Parties meet with interested citizens at, for example, the Tri-Party Agreement Quarterly Public Involvement meetings to discuss the details of the budget public meetings. Citizens can request specific information, as mentioned above, during the planning process of these meetings.

Comment: The description of PNNL under “Science and Technology Mission” is biased and untrue. Only a small part of the research and development at PNNL supports technologies used at the Hanford site. This section should be trimmed and contain fact, not promotional material.

Response: The Tri-Party agencies agree with you that these descriptions of Hanford should be concise and objective. The agencies have reviewed this section and it has been rewritten accordingly. (See page 20 of the Community Relations Plan.)

Comment: Under Section 3 of the current CRP draft, several additions need to be made to descriptions of buildings/areas onsite:

- Violations at PFP led to an explosion in 1997.
- There is no mention of risks at the 300 Area. Also, who is demolishing 300 Area buildings?
- 400 Area: Very biased view of FFTF. This should mention the thousands of public comments made to shut down the reactor.

Response: The Tri-Party agencies agree with you that these descriptions of Hanford should be concise and objective. The agencies have reviewed this section and it has

been rewritten accordingly. (See page 24-25 of the Community Relations Plan for information on PFP, the 300 Area and FFTF.)

Comment: Section 4 of the draft CRP is very biased. This section needs to be balanced with other regional perspectives, such as the downriver and down winder perspectives. Addition: Site employment is at an all-time high for cleanup.

Response: We agree. The community background section was developed in 1989 and followed the traditional Superfund model. Through the years it has been recognized that Hanford is a regional issue, and the text has been modified to reflect the regional rather than just the local community. (See pages 27-28 of the Community Relations Plan.)

Comment: The information included in Appendix A for MTCA is inadequate! Much more description (that we have included in our comments above) is necessary to make the CRP adequate to fulfill MTCA public involvement requirements.

Response: Appendix A has been revised and expanded to include information regarding the public involvement requirements for Model Toxics Control Act, as well as the Clean Air and Clean Water Acts, and an description of how the varying laws will be coordinated for specific actions. (See page A-1 of the Community Relations Plan.)

4. Fawn McNeely, Hanford Information Network

Comment: I am writing to offer my comments on the Tri-Party Agreement's requirement that the public be involved in commenting on the cleanup of Hanford. I have attended three or four of the meetings over the past few years held in Portland. My comments are threefold:

- The same people attend all of the meetings. It doesn't seem that the Department does a very good job in reaching out to the real public as a whole.
- This means that the same arguments are played out at each hearing. Thus, it is very frustrating to attend these meetings. This discourages people from getting involved.
- The briefings last far too long and are far too technical. This also leads to frustration and discourages most people from getting involved.

I have three suggestions:

First, all meetings should start with a one-hour, simple, general overview that would be informational in nature, and conclude at the end of the hour. This meeting should be geared towards the general public. Then, for those who are more involved or who have an ax to grind, the next hour or two could be set aside for more in-depth discussions.

Second, the Department needs to stop catering only to the 45-50 people who attend all of these meetings (actually, it's more like 10-15). Why not try to reach out more to the public in the places they go: malls, schools, service groups, etc. with a simpler message. Even if these people

are only briefly involved in the process, it helps educate more of the public about Hanford and may bring a few new faces to the table.

Third, tell it like it is. The last couple of meetings that I have attended have been better. Steve Wickerman (Wiegman) of the Department (Office of River Protection) has done a good job at recent meetings of admitting that the tank cleanup program has had a spotty record. The truth is the best policy. Thanks. These are important cleanup issues for the Columbia River, and I appreciate your help.

Response: The agencies are interested in hearing outreach ideas to interest a broader public in the Hanford cleanup and to improve the public meeting format. Your suggestions are innovative and will be under consideration for future public participation activities.

5. Jonathan Eames, Hanford Information Network

Comment: I want to offer my comments in the context of your efforts on the TPA Public Involvement exercise. As a member of a group that has taken particular interest in tank farms, I want to express my views on the need to do a better job in reaching out to a broader sector of the public. For instance, there seem to be very few members of the “public” who are actively involved in participating in the public meetings you have held so far. While I respect their willingness to get involved, I believe that we need to take it to the next level and work to get more of the general public involved.

There clearly is a need for a huge increase in public knowledge of the threat posed to the Columbia River by the leaking tanks, and a need for the public to get more actively involved in supporting full funding for this project. Thus, I would like to see a much more active role in sending DOE briefings to other mediums for sharing information. For instance, the Portland City Club, or Chamber of Commerce, or other similar opportunities. Perhaps, DOE could join with groups like Hanford Watch and Hanford Information Network to develop a short, concise presentation that could be given to these organizations. That, in my mind, is the best way to communicate to the larger public. Thank you for the opportunity to provide my thoughts.

Response: We appreciate your innovative outreach ideas to interest citizens in the Hanford cleanup. Your suggestions will be under consideration for future public participation activities.

6. Doug Riggs, Hanford Information Network

Comment: Thank you for taking the time to work through the public comment process. I am writing as a citizen, parent, and member of the Hanford Information Network, and as someone seriously concerned about the long-term health of the Columbia River.

As you well know, I have worked closely with a group of Hanford Information Network members to attend and participate in numerous public meetings over the past few years. Some have been productive. Others have been less so. I have been particularly concerned by the

personal level of the attacks leveled against DOE personnel, and against me specifically. I would hope that the DOE would do a better job of facilitating these meetings to ensure that comity and respect for all parties is upheld.

I also want to point out that members of the Hanford Information Network have suggested expanding the DOE's efforts beyond the existing activist network. We have found that our "road show" visits to schools and malls have been well received. Our basic, multi-media presentation keeps the interest level up among our audience. Our 45-minute (max) briefing is long enough to share the information, and short enough to keep people's attention. As HIN members have suggested, DOE could work with us to expand the scope of these presentations.

Again, Gail, I have appreciated your hard work on these briefings, and please pass along my willingness to stay involved and active in getting the word out on the importance of fully cleaning up Hanford and protecting our environment.

Response: The Tri-Parties will continue to work to improve the public meeting format and facilitation efforts to ensure no one is personally attacked. Additionally, the agencies appreciate an offer to team with additional outside groups in developing more effective public participation activities and look forward to working with you in the future. We are interested in pursuing your ideas.

7. Robert Davis, Hanford Information Network Chair

Comment: As you know, the Hanford Information Network members and I have been concerned and involved in the public forum regarding the Hanford cleanup effort over the last several years. I have attended more than a dozen public meetings, budget reviews and information meetings during that period of time, and believe that while they are well intentioned, they do not do enough to get the cleanup message out. Not only is the audience limited, but they tend to focus on problems with the management and not informing of the technical challenges and path forward. They always find a way to blame somebody else. These forums need to be educational and informative. And, sometimes you have to start at the basics. Why should the public be concerned? Just what is milestone M-45 and why is it important? When do we know 618 is leaking; why don't we fix it? What is the difference between risk and consequences? What is the difference between Hanford waste and Idaho waste and just what is the difference between immobilization and disposal? These are fundamental questions the public needs to know.

Especially in light of recent suggestions that the long-term tank cleanup budget might be slashed and Records of Decisions modified, there is a serious need to reach out to the public with factual information. If you upgrade the public involvement, we will get the teachers, business leaders, and students to attend. These decisions will literally affect the health and the economic viability of our region for decades to come, and yet we have only a small group of activists (myself included) in the Northwest who are up to speed on this issue. This is a serious problem.

I would like to propose three major changes in your outreach efforts:

- Expand your efforts to reach out to a broader group of the public. Work with local groups like ours to put together a brief and interesting presentation on what’s going on at Hanford, and how and why the public should get involved. Take this show “on the road” to Rotary groups, business groups, local watershed councils, and other organizations.
- Change the focus of your existing meetings to be more interesting and to the point. Our group has discussed ensuring that each meeting begins with a presentation and question/answer session limited to no more than one hour. Then, if others want more details, or want to stay longer, they can do so after that comprehensive hour is up. The public does not have time to sit through four-hour meetings with endless talking heads. This process needs to be changed if we are to get the public more interested and involved.
- Educate the teachers, which will educate the children. Students in 6th grade now will be voting members of the public when the Hanford Vitrification facility goes “hot”. Establish a summer three-day tour and workshop or other forum for the educators from Washington and Oregon.

We are ready to fight for full funding for Hanford cleanup activities. We want to work for waste stabilization parity with the other sites. We are ready to work with you to educate the public on the threat to our environment and what we can do to address this threat. We are simply waiting for a more effective outreach plan from the Department and the associated TPA agencies.

Response: The agencies agree that there is always a need to improve the public meeting design so the meetings provide more information on Hanford. In addition, your outreach ideas provide some good suggestions to reach out to other citizens who may not have been involved in Hanford public involvement activities. The Tri-Parties will consider your suggestions when planning for future public information and involvement activities.

8. Cyndi Nunn, Hanford Information Network Board Vice Chairman

Comment: Public involvement is a critical element of ensuring cleanup of the Hanford site. Public pressure on the DOE and policy makers is necessary to ensure that cleanup addresses key needs and is fully funded. There are a number of groups and individuals who have been involved in the public involvement process. These people are to be commended for their dedication toward this critical issue. Many have devoted years of their lives to ensuring that Hanford is cleaned up. I would suggest that the next phase in Hanford’s cleanup activities are the most important. Rumors are swirling about possible additional cuts to Hanford cleanup and milestones. Yet, there is only a small cadre of activists like us willing and able to take up the cause.

Our group has had several recent discussions about the need to expand the outreach effort. We have focused recently on taking the cleanup message to malls, schools, and service groups. We have been well received and encouraged by these visits. As a result, we would urge the Department to work with us and with other similar groups to ensure that we reach a broader slice of the public. The DOE must spend inordinate sums on the briefings in Seattle or Portland or elsewhere only to encounter a small group of 10 or 20 or 30 citizens. These meetings are important and we do not object to them continuing. But we believe that the Department could work with local groups and agencies like the Hanford Information Network, the Oregon

Department of Energy, and others to take the message out to other venues. And, we would argue that reaching 100 people in one hour is at least as valuable as reaching ten people in four hours. We could easily work with the Department on a plan that would accomplish this goal. Please feel free to contact us if we can be of any assistance.

Response: The agencies appreciate an offer to team with additional outside groups in developing more effective public participation activities and look forward to working with you in the future. We are interested in pursuing your ideas.

9. Joe Landry, Hanford Information Network

Comment: I have only recently become involved in a group interested in cleaning up the Hanford site. I have reviewed some of the materials put out by the Department of Energy and would like to offer my comments. From my experience working with the public, brevity is important. While Hanford is a complicated subject matter, there is only a limited timeframe to “reach” or connect with citizens. Thus, public briefings should be concise. Focus on one hour at the beginning of meetings for those of us who might not yet be Hanford “wonks.” Then, those who wanted to stay longer could certainly do so.

Second, a better job needs to be done reaching out to the public. In my discussions over the past several weeks, I have learned that regular “budget briefings” are held in Seattle. Yet I, as a citizen, have never heard of these briefings. Although I plan to attend in the future, some better method of communications needs to be developed. In addition, I have learned about the Hanford Information Network school visits, and believe that these should continue to be supported.

Third, I read on your website that public tours are one thing that you are considering. But I also heard from the Hanford Information Network that their planned tour for this month was cancelled due to security reasons. I certainly understand the need for security, but can’t imagine what a group of environmental activists could do at the site, especially if the normal security checks were done before we got onto the bus. I can say that touring the site would be the best way to get people excited about getting more involved, and I would like to see more active support of groups like the Hanford Information Network that would like to bring citizens to the site. There could be no better way to increase public involvement than these types of activities. It would be money well spent.

Response: The agencies are interested in hearing outreach ideas to interest a broader public in the Hanford cleanup and to improve the public meeting format. Your suggestions are innovative and will be under consideration for future public participation activities. Regarding the cancellation of the tour, the Hanford Site has had to take extraordinary security precautions since the September 11th terrorist attacks. We regret that the tour was cancelled, however, security is at a state of heightened level, and there are measures that must be taken throughout the Hanford Site to ensure the safety of the public.

10. Andrew Aebi, Hanford Information Network

Comment: I am writing to ask that you consider the following changes to your public involvement efforts:

First, given my past experience attending meetings, I would urge that you work to ensure that your meetings are more focused. Shorter, more concise briefings by the Department of Energy would be much more helpful. Second, I would urge that the opportunity for the public to be briefed on these issues take place in a shorter timeframe at the beginning of each meeting. I attended meetings in Portland that lasted four hours. Neither I, nor my colleagues are interested in sitting through such meetings. Thus, covering the key subjects should be done first, and those who want more information could stay for the longer, more in-depth briefings. Third, I want to urge DOE personnel to include the good and the bad in their briefings. Honestly admitting your mistakes as well as your successes is key to the public believing your story. Fourth, I would urge that the Department work to make the meetings more interesting. For instance, a short 5-8 minute video might help to give people more context to the issues and show the beauty of the site and its proximity to the Columbia River. These efforts might help better engage the public. While guitar-playing activists add spice to the meetings, they don't always add substance, and a video presentation might fill that void.

Response: The agencies are interested in hearing from the public on improvements to the public meeting format. Your suggestions are innovative and will be under consideration for future public participation activities.

11. Mike Plahuta, Hanford Information Network Director

Comment: Thank you for the opportunity to offer our suggestions on public involvement. We have appreciated the efforts you and your DOE colleagues have made to coming to Seattle for meetings. While often contentious, we recognize that these meetings are important. However, our group has a proposal for expanding the number of people reached by these efforts.

We believe that the Department should capitalize on the work that we have done with the Washington Department of Ecology in putting together a "traveling road show." Our multi-media presentation has been taken to malls and schools and has been well received. Inevitably, we get numerous questions, and people seem genuinely interested in receiving more information.

While we do not believe that these presentations supplant the need for more detailed public meetings to discuss technical and policy decisions, we do believe that the road shows could be taken to service groups, local environmental meetings, city councils and other associations to take a simple message to the general public: there is an environmental problem, here is what it is, here is what is being done about it, and here is how you can get involved.

This simple message is important. And it is proven. While we would propose that DOE personnel might be invited to speak briefly at these briefings, we would propose that members of the Hanford Interest Network (or other groups that were involved) and the Washington (State) Department of Ecology or Oregon Office of Energy officials lead the discussions. This gives the information an additional amount of objectivity. DOE would help fund these outreach activities as an integral part of its responsibility under the TPA.

Again, our goal is efficient and effective cleanup of the site. Public involvement is critical. Our proposal would effectively supplement the existing program. Thanks for your interest in this issue.

Response: We appreciate your ideas on better outreach to citizens and improving future public involvement activities. The agencies will consider implementing your ideas in the future.

12. Ann Brown, The Dalles, Oregon

Comment: Please note I am an interested citizen who demands adherence to the principles of democracy. In particular all voices have a right to be heard and made record of, as provided for by law. As such, I request that the “Bill of Rights” as presented by the Columbia River Keepers (Volume 2, Issue 3, Page 4), be honored. Excluding voices, and/or proceeding with a pre-determined agenda irregardless of public comment is unacceptable. Please honor the requested Bill of Rights.

Response: The following has been revised in the Community Relations Plan, “The Tri-Parties strive to include a wide variety of viewpoints, such as an alternative viewpoint or local perspective, in all Tri-Party Agreement public meetings.” Regarding early notification of a public involvement activity, the following has been added to the Tri-Party Agreement, “ The Tri-Parties will strive to notify stakeholders 30 to 45 days before the start of a public comment period or before a public meeting.”

13. Public Involvement Bill of Rights signed by the following citizens: Valerie Shubert, Seattle, Washington; Monica Zuker, Lake Forest Park, Washington; Deren Murti, Seattle, Washington; Kerstin Ellstrom, Seattle, Washington; Karen Hertz, Bothell, Washington; P. Anna Johnson, Seattle, Washington; Alison Marti, Seattle, Washington; Ruth Liatos, Seattle, Washington; Barbara Zepeda, Seattle, Washington; Tiffany Devoy, Seattle, Washington; Adam Niermann, Seattle, Washington; Kay Thode, Seattle, Washington; Evelyn Amyes, Seattle, Washington; Janelle Koester, Hood River, Oregon; George Vieira, White Salmon, Washington; Steve White, White Salmon, Washington; Eric Andersen, Hood River, Oregon; Jason Deach, Hood River, Oregon; and, Heidi Vogel, Hood River, Oregon

Comment: Right to have a public meeting in your area, if ten or more people request one.

Response: Under the various laws governing Hanford cleanup, there are many opportunities for citizens to request public meetings or hearings. After much consideration, the Tri-Parties believe that adding the language of ten or more people requesting a meeting may prove to be more restrictive than what is currently in the Community Relations Plan. The draft Community Relations Plan, dated August 2001 read, “If significant interest is demonstrated, the Tri-Parties will conduct a formal public process.” The Tri-Parties believe the language on public meeting requests is sufficient and no revisions will be made to the Community Relations Plan.

Comment: Right to be notified at least 30 days before a public meeting by ad or mailing.

Response: The following has been added to the Tri-Party Agreement Public Notification Process, “ The Tri-Parties will strive to notify stakeholders 30 to 45 days before the start of a public comment period or before a public meeting.”

Comment: Right to receive *effective* notice, which informs you of the proposed decision and how it may impact you.

Response: The Tri-Parties agree that effective public notices are a crucial component of attracting public interest and involvement in Hanford cleanup issues. The agencies believe it is important to continue working with stakeholders to ensure that public notices and other materials are written in reader-friendly language that explains the issues and provides the appropriate information to explain why the public should get involved. Additionally, as stated on page 6 of the Community Relations Plan, the agencies do commit to work with stakeholders whenever possible, to develop notices and materials that employ the best methods for reaching out to the public.

Comment: Right to have information regarding a decision before the comment period ends.

Response: Tri-Party Agreement information requests are governed under Section 9 of the Hanford Tri-Party Agreement Action Plan. If USDOE fails to comply with the requirements set forth in Section 9, EPA and Ecology may invoke the enforcement provisions in the Tri-Party Agreement.

Comment: Right to hear, at meetings, alternative viewpoints to those of the Agencies.

Response: The following has been revised in the Community Relations Plan, “The Tri-Parties strive to include a wide variety of viewpoints, such as an alternative viewpoint or local perspective, in all Tri-Party Agreement public meetings.”

Comment: Right to hear or see a response to your comment before it's too late.

Response: We understand the philosophy behind your request to allow the public the opportunity to review the agency responses prior to finalizing the decision. In theory we agree this would be desirable. However, in practice this is not conducive to decision making and moving the cleanup forward. As an example, in the last revision to the Community Relations Plan the agencies tried to implement this system. Revisions to the document took nearly two years to complete. If this system was implemented across the board, it has the potential to delay any significant cleanup progress.

Comment: Right to be told of decisions that may reduce cleanup standards or could restrict future public use of Hanford Reach National Monument, the Columbia River, or other parts of the site.

Response: The Tri-Parties strive to keep citizens, key stakeholder groups, and Hanford Advisory Board members informed of decisions that may reduce cleanup standards or could restrict future public use of Hanford Reach National Monument, the Columbia River, or various parts of the Hanford Site.

Comment: Also, Hanford Cleanup decisions should meet the same public notice and involvement requirements as all other hazardous waste sites in Washington State.

Response: The Tri-Party Agreement Public Notice section has been rewritten to provide more information on developing effective public notices. (See page 6 of the Community Relations Plan.)

14. Judy Pigott Swenson, Seattle, Washington

Comment: I am just returning from a conference on the Columbia River. The experience was profound. I want to express my conviction that cleaning up the Hanford Nuclear area, preserving the Hanford Reach, and finally really taking care of both the nuclear waste and our natural resource is tremendously important. The glassification proposal seems key – and should not be diluted. Anything that impinges on the Hanford Reach or the Columbia River is unacceptable. Please do what is possible to see that this cleanup happens NOW. Thank you for reading this.

Response: The Tri-Party Agencies do not always agree on every issue, but protecting the Columbia River is a common principal that we all share and have heard expressed by the public many times over. Hanford and its regulators are pursuing actions that accelerate cleanup along the Columbia River shoreline while reducing the risk of contamination from other major sources that could leak into the environment, and ultimately the River.

Continued progress toward glassifying Hanford’s high-level radioactive tank waste, and site-wide cleanup overall, will require a long term commitment by all three agencies, congress, the affected tribes and the public if sufficient funding is going to be obtained to keep Hanford’s cleanup moving forward. It took fifty years of Cold War military activities to produce the volume of waste that is stored at Hanford. It will take an extensive commitment to make the site compliant with current cleanup laws. The Tri-Party agencies are committed to doing this as quickly and safely as possible.

15. John F. Gordon, Seattle, Washington

Comment: I wish to endorse the petition from the Heart of America Northwest organization seeking greater public involvement in discussions concerning the Hanford plan cleanup delays

due to a budget shortfall. I strongly believe that a 30-day advance notice of public meetings should be followed. I would hope that standard procedures at public meetings be followed so that participants could register at arrival time with a hearing secretary to speak and be heard in proper sequence and those with written comments could submit them to hearing officers for the record. Certainly any public record from the U.S. Department of Energy advisors – including those with various viewpoints should be available at meetings or hearings. I have followed the Hanford Project from the time the Plant was originally developed during World War II, when I was stationed at the Naval Air Station at Pasco. During peacetime, I have served as a special assistant to two governors, served in the Washington State Guard, a reserve for the National Guard, as an officer, with the rank of major, as commissioner of Employment Security for the State of Washington and as CEO for two State Industry Associations. These assignments took me to the Tri-City area many, many times and afforded me additional opportunities to follow the Hanford plant progress including the plan for the cleanup agreement and the present forecast for a budget shortfall.

Response: The Tri-Parties encourage the involvement of citizens in the USDOE budget process. Regarding the notification of public involvement activities, the following has been added to the Community Relations Plan section entitled, “Tri-Party Agreement Public Notification Process, “ The Tri-Parties will strive to notify stakeholders 30 to 45 days before the start of a public comment period or before a public meeting.” In addition, the Tri-Parties agree that citizens should be given the opportunity to provide a variety of viewpoints at public meetings. The following has been revised in the Community Relations Plan, “The Tri-Parties strive to include a wide variety of viewpoints, such as an alternative viewpoint or local perspective, in all Tri-Party Agreement public meetings.”

16. Janet Kimball, Seattle, Washington

Comment: I am writing about the Community Relations Plan. I believe Hanford cleanup decisions should meet the same public notice and involvement requirements as all other hazardous waste sites in Washington. Specifically, people have a right to have a public meeting in our area, if ten or more people request one. Also, we have the right to receive effective notice, which informs us of the proposed decision and how it may impact us. Finally, we have the right to be told of decisions that may reduce cleanup standards or could restrict future public use of Hanford Reach National Monument, the Columbia River, or other parts of the site. Communication is important. Please keep us appropriately informed.

Response: Under the various laws governing Hanford cleanup, there are many opportunities for citizens to request public meetings or hearings. After much consideration, the Tri-Parties believe that adding the language of ten or more people requesting a meeting may prove to be more restrictive than what is currently in the Community Relations Plan. The draft Community Relations Plan, dated August 2001, currently reads, “If significant interest is demonstrated, the Tri-Parties will conduct a formal public process.” The Tri-Parties believe the language on public meeting requests is sufficient and no revisions will be made to the Community Relations Plan. Regarding the notification of public involvement activities, the

following has been added to the Community Relations Plan section entitled, “Tri-Party Agreement Public Notification Process, “The Tri-Parties will strive to notify stakeholders 30 to 45 days before the start of a public comment period or before a public meeting.” Finally, the Tri-Parties strive to provide information to citizens, key stakeholders, and Hanford Advisory Board members of decisions that may reduce cleanup standards, restrict future use of the Hanford Reach National Monument, the Columbia River, or various parts of the Hanford site.

17. Susan Babilon, Walla Walla, Washington

Comment: As I will be unable to attend the public meetings on the Hanford Community Relations Plan scheduled for October 24 and 29, I would like to submit my comments in electronic format. Since 1994, when I moved to the Walla Walla Valley, I have attempted to remain involved in Hanford issues, as opportunities for the public have arisen. During that time, I have often been disappointed in the limited amount of information accessible to the public; the inaccessibility of this information whether that be due to late notice of public hearings and impending decisions; lack of public hearings in my area; (the ride to the Tri-Cities area at night is neither easy nor possible for most residents of Walla Walla) or, lack of notices of such public hearings in our local Walla Walla newspaper.

Response: The Tri-Party Agencies appreciate your taking the time to comment electronically during the public comment period. We heard many suggestions during the public comment period on how to improve our notification and information materials. One tool we expect to make better use of is electronic mail. For example, we are currently posting newsletters and calendar listings on the agencies web sites. We are also exploring how to better notify the public of upcoming events by electronic mail.

Comment: Hanford has not held many meetings in the Walla Walla area. However, an information meeting on Hanford was held last winter at a local college campus. We will remain open to meeting requests around the region. The upcoming Community Relations Plan should address the following concerns and, require that a public meeting be held in my town if at least 10 people request one.

Response: Under the various laws governing Hanford cleanup, there are many opportunities for citizens to request public meetings or hearings. After much consideration, the Tri-Parties believe that adding the language of ten or more people requesting a meeting may prove to be more restrictive than what is currently in the Community Relations Plan. The draft Community Relations Plan, dated August 2001, currently reads, “If significant interest is demonstrated, the Tri-Parties will conduct a formal public process.” The Tri-Parties believe the language on public meeting requests is sufficient and no revisions will be made to the Community Relations Plan.

Comment: Require that the public be notified at least 30 days before a public meeting by advertisement in local newspapers (such as the Walla Walla Union Bulletin).

Response: The following has been added to the Tri-Party Agreement Public Notification Process, “ The Tri-Parties will strive to notify stakeholders 30 to 45 days before the start of a public comment period or before a public meeting.”

Comment: Require that these notifications are clearly written in layman’s terms and clearly inform the public of a proposed decision and how it will impact the public.

Response: The Tri-Parties will continue to improve notifications to include key information on the proposed decision and possible impacts to the public. (See page 6 of the Community Relations Plan.)

Comment: Require that the comment period be clearly noted.

Response: The Tri-Parties have always tried to provide clear and understandable information on an upcoming public comment period, however, suggestions on how the Tri-Parties can improve on public comment period notifications are always welcome. (See page 6 of the Community Relations Plan.)

Comment: Require that the public be notified at least 30 days before the end of a comment period.

Response: Members of the public are given information on the start and the end of public comment period. The following has been to Community Relations Plan, “If a public comment period is extended, then the Tri-Parties advertise or publicize the new public comment period end date in news releases, advertisements, and fact sheets that are sent to citizens and key stakeholders.”

Comment: Require that alternative viewpoints to those of the government agencies be presented at public hearings.

Response: Regarding the alternative viewpoint, the following has been revised in the Community Relations Plan, “The Tri-Parties strive to include a wide variety of viewpoints, such as an alternative viewpoint or local perspective, in all Tri-Party Agreement public meetings.”

Comment: Require that the public be informed of all decisions that might reduce cleanup standards or restrict future public use of the Hanford Reach National Monument, the Columbia River, or other parts of the site.

Response: The Tri-Parties strive to provide information to citizens, key stakeholders, and Hanford Advisory Board members of decisions that may reduce cleanup standards or restrict future public use of the Hanford Reach National Monument, the Columbia River, or various parts of the Hanford site.

Comment: Require that Hanford cleanup decisions meet the same public notice and involvement requirements as all other hazardous waste sites in Washington State.

Response: The Tri-Party Agreement Public Notification Process section of the Community Relations Plan has been rewritten to include more information on effective public notices. (See page 6 of the Community Relations Plan.)

18. Joy Goldstein, Vashon, Washington

Comment: I have attended two of the public meetings about the Hanford FFTF, and I was absolutely furious at the way the public was treated at the second one. The way the third one was organized made it obvious that it was pointless for me to attend. Government agencies need to remember who is paying their salaries! I am writing to request that the revision of the Hanford Community Relations Plan include: The right to be notified at least 30 days before any hearing by mailing.

Response: The following has been added to the Tri-Party Agreement Public Notification Process, “ The Tri-Parties will strive to notify stakeholders 30 to 45 days before the start of a public comment period or before a public meeting.”

Comment: The notice should be readable and should include information about the proposed decision and how it would affect the recipients. If the decision is UNDOING a previous decision, the notice should say so.

Response: The Tri-Parties agree that effective public notices are a crucial component of attracting public interest and involvement in Hanford cleanup issues. The agencies believe it is important to continue working with stakeholders to ensure that public notices and other materials are written in reader-friendly language that explains the issues and provides the appropriate information to explain why the public should get involved. Additionally, as stated on page 6 of the Community Relations Plan, the agencies do commit to work with stakeholders whenever possible, to develop notices and materials that employ the best methods for reaching out to the public.

Comment: We should have THE RIGHT TO HEAR, AT MEETINGS, and ALTERNATIVE VIEWS TO THOSE OF THE AGENCIES. If this is not done, we the people are going to assume that we are being lied to. Community relations means community PARTICIPATION by all stakeholders.

Response: The Tri-Parties agree that there should be a variety of views at public meetings. The following has been revised in the Community Relations Plan, “The Tri-Parties strive to include a wide variety of viewpoints, such as an alternative viewpoint or local perspective, in all Tri-Party Agreement public meetings.”

Comment: We should have the right to have information about a decision before the comment period ends; and we should get responses to our comments before it’s too late to reply.

Response: Tri-Party Agreement information requests are governed under Section 9 of the Hanford Tri-Party Agreement Action Plan. If USDOE fails to comply with the requirements set forth in Section 9, EPA and Ecology may invoke the enforcement provisions in the Tri-Party Agreement.

Comment: There should be a public meeting in a local area if 20 people request one. This means more than one meeting in Seattle, among other things.

Response: Under the various laws governing Hanford cleanup, there are many opportunities for citizens to request public meetings or hearings. After much consideration, the Tri-Parties believe that adding language, which specifies a particular amount of more people requesting a meeting, may prove to be more restrictive than what is currently in the Community Relations Plan. The draft Community Relations Plan, dated August 2001 read, "If significant interest is demonstrated, the Tri-Parties will conduct a formal public process." The Tri-Parties believe the language on public meeting requests is sufficient and no revisions will be made to the Community Relations Plan.

Comment: Most of all, we have a right to be told of ANY decisions that could reduce cleanup standards, slow the process down, or restrict the possibility of public use of Hanford Reach National Monument, the Columbia River, or other parts of the site.

Response: The Tri-Parties strive to keep citizens, key stakeholder groups, and Hanford Advisory Board members informed of decisions that may reduce cleanup standards or could restrict future public use of Hanford Reach National Monument, the Columbia River, or various parts of the Hanford Site.

Comment: Also, decisions about the cleanup should meet AT LEAST the same public notice and involvement requirements as all other hazardous waste sites in Washington State.

Response: The Tri-Party Agreement Public Notification section of the Community Relations Plan has been rewritten to include more information on effective public notices. (See page 6 of the Community Relations Plan.)

19. Robin Klein, Hanford Action of Oregon

Comment: Please add "Hanford Action of Oregon" to list of Regional/Environmental groups in Appendix D.

Response: Yes, Hanford Action of Oregon has been included in the list of Regional and Environmental groups in Appendix D.

Comment: Use a graphic design/advertisement-building agency from outside the Tri-Cities and within other communities where public is being sought out who doesn't do DOE or other such work.

Response: The Tri-Parties agree that effective public notices are a crucial component of attracting public interest and involvement in Hanford cleanup issues. The agencies employ trained communications and/or graphics staff members to draft and design these notices. Additionally, we do not agree that employing an outside agency to develop these materials would reduce costs, since the Tri-Party Agreement requires that all materials bearing the Tri-Party Agreement logo must be reviewed and approved by all three agencies prior to publication. Therefore, the agencies feel that using outside resources would increase the amount of time and money spent on developing public notices, and we will not make a change in the Community Relations Plan.

However, the agencies agree to continue working with the public interest groups to ensure that public notices and other materials are written in reader-friendly language that explains the issues and provides the appropriate information to explain why the public would want to get involved. (See page 6 of the Community Relations Plan.)

Comment: Place ads in relevant media, especially and including local and regional environmental/public health medical journals, etc.

Response: The agencies will continue to find better ways to notify the public of upcoming public involvement activities through the various media.

Comment: Regarding the request for a hearing/meeting, should an organization request a hearing in an area, then it should be granted.

Response: Under the various laws governing Hanford cleanup, there are many opportunities for citizens to request public meetings or hearings. After much consideration, the Tri-Parties believe that adding the language that specifies an organization or ten or more people requesting a meeting may prove to be more restrictive than what is currently in the Community Relations Plan. The draft Community Relations Plan, dated August 2001 read, "If significant interest is demonstrated, the Tri-Parties will conduct a formal public process." The Tri-Parties believe the language on public meeting requests is sufficient and no revisions will be made to the Community Relations Plan.

Comment: Electronic notices (should) replace hard copies as much as possible.

Response: The agencies agree and will look for ways to improve electronic public notification.

Comment: In response documents, give numbers of comments when comments represent more than one commenter.

Response: In the future, the Tri-Parties will consider providing a total number of comments when a single comment is made more than once in Comment and Response documents.

Comment: Give accurate perspective in responses.

Response: Providing accurate and balanced responses is what the Tri-Parties strive to do. We appreciate your interest in making Hanford's public participation activities a meaningful experience for the public.

20. Kerstin Ellstrom, Seattle, Washington

Comment: Thank you for hosting such a pleasant meeting. My comments are:

- any EIS should be included in the public process;
- public notice (should be) informative and meaningful, outside advertising experts hired in order to achieve this;
- comment period, no less than 60 days, for reasons stated in meeting; and,
- kudos to DOE for such an easily readable and informative draft.

Response: The Tri-Parties appreciate your comments on the Community Relations Plan and will consider your input for future involvement activities.

FORMAL PUBLIC COMMENTS

**Community Relations Plan Public Meeting
Hood River, October 24, 2001
Approximately 20 citizens attended**

21. Cindy deBruler, Executive Director of Columbia Riverkeeper

Comment: I would like to comment on the public involvement process and the plan. I think the most important thing that needs to be incorporated as far as a process is really a way to give the public feedback on how their comments are incorporated. As mentioned at this meeting earlier, many of us have been involved in this process for over a dozen years and have not received specific comments or feedback on our comments or how they were incorporated, other than a couple of times. I would say in that many years, just a couple of big documents that summarized comments, and those were maybe eight months after the public meeting, when the public had forgotten all about it and the decisions long been made. So what that does, it sends the message to the public that they can go to the public meeting and talk and give their opinion but then it falls into a black hole and they never have any information back as to whether their information was used, whether their comments were incorporated or not. It really creates a very frustrating type of scenario for the public as far as future turning out at public meetings. These public meetings in Hood River have been going on for nine years, and so you are asking a big thing of a person: A member of the public to give their time to come and be involved to learn enough about it, to be able to comment intelligently on what's going on. This is probably one of the more general, easier to understand meetings that have been held here. Lots of times it's very complex

cleanup issues and to make meaningful comments takes a lot of involvement and dedication. Then to walk away and never know what happens or to just hear that a decision was made that was just the opposite of what you heard the majority of the public commenting on does not encourage public participation in the future. So, if there is specific public response language that can be made so that it is in a timely manner, what's in the Bill of Rights (*see Heart of America Bill of Rights on pages 27-29*), I would strongly endorse as far as the language being added to this. Another example is the Hanford Advisory Board provided consensus recommendations on this document. Greg, I know had asked that tonight, hopefully, we would know what was going to happen to the Hanford Advisory Board's recommendations that were made regarding this document. Nothing. I didn't hear anything. Maybe I missed it. So we don't know, again, even the Hanford Advisory Board's advice on this, whether it's falling into a hole or whether we can expect to see a large amount of it incorporated or whatever. Again it creates a lot of frustration and it does not feed a healthy interactive public involvement process.

Response: The Tri-Parties agree that commenters have the right to know that their comments were considered and how those comments were used in making a final decision. The Tri-Parties agree that a Comment and Response document should be prepared within 60 days of the end of the public comment period, when possible. If delays occur due to a large volume and/or complexity of comments, interested citizens will be notified by mailer, the *Hanford Update* and/or the Tri-Party Agreement website at <http://www.hanford.gov/tpa/tpahome.htm>. Once the document is finalized, it will be made available to citizens who provided comments and others who request the Comment and Response document. If there are only a few comments made during a public comment period, the agencies may prepare individual letters and/or contact the commenters directly in response to comments.

Regarding hearing feedback on the Hanford Advisory Board advice during the public meeting held in Hood River, the agencies followed the appropriate public process for this draft Community Relations Plan. While the Hanford Advisory Board advice raised some very important issues, it would have been inappropriate to make decisions on whether or not to incorporate any or all of it before the complete process had been followed. One of the primary foundations of public involvement is to consider all comments received equally. Making a decision regarding the Hanford Advisory Board advice prior to the close of the public comment period could have had the effect of discounting potentially differing comments received from another sector of the public, or lending the appearance that the agencies were not taking all comments into account in an unbiased manner.

The Hanford Advisory Board advice and the agencies' responses are included as part of this Comment and Response document. See pages 1-4 of this document for more information.

22. Greg deBruler, Bingen, Washington

Comment: I'm representing myself. The conversation we were talking about. This is comments and thoughts. The gentleman from Los Alamos mentioned that he has the same

frustration with the process and how do we fix it. We don't fix it by having the three agencies go back into their rooms, close the door and figure out how they are going to respond to comment. I think the onus is on the public to tell them how we want the response of comments to be done. For example, this meeting is a very small meeting. You are going to have one more small meeting in Seattle--real easy to respond to each comment that is germane, if it's some comment that's out there that isn't even talking about the subject matter, than fine, those can always slide off because they always do, but there needs to be a direct response back. A lot of times, like the gentlemen over here mentioned, about his question that he asked which are very specific. The information they gave him had nothing to do with the comment. The 300 Area FF-2 comment document that came out. There were a lot of comments generated on the 300 Area FF-2, which is the contaminated area of Hanford with uranium. The response to comment document was, well I will put it to you this way. I had an analyst in Portland look at it just to do some research for me and he said in all the years he has been looking at documents this is probably the best one that didn't answer any of the questions. He said, "It was good, I've never seen anything like this," and these guys are trained in answering some other question or trying to pretend like they are answering your question. So, when questions are being asked and they are very specific, answer the questions directly, straight on. Going back to Max's comment on how we roll them together, I heard what you, Max, accessed information, if there is a comment period on a 300 Area FF-2, and there is information that is being requested, let's say for example on that one, information about the movement of uranium through the Vadose Zone and request for information for full documentation ahead of time before the comment period closes, the technical people should have access to those documents, full access to all those documents. PNNL or any other lab or anybody else out there shouldn't have the ability to hold that information back, because if we want to have good input from the public, then they have to have all the information that they know that is out there or don't know that is out there. If accessed information was actually free flowing, then the FOIA (the Free of Information Act) office would be out of existence. Nobody would have to make a FOIA (request). I never make FOIA's because to me it's a waste of my time. I try to get the questions answered at the meeting and then ask them to respond directly, and like I said they never do. Citizens should have the right to respond (to) written responses, to their specific comments 60 days preferably before the pending decision has been made. Somebody just made a comment that they would like to have a response to comment, not eight months after the fact. If they had a response to comment before the decision was made, you might get actual rebuttals that come back that actually then help you make a better decision. But the way, the process really works is, we are going to do response to comments because it is our legal obligation, we have already made our decision, so we will throw the document out there to cover our bases and it isn't working properly, so do what you can do to fix it. If you want more advice, call me; we can talk on the phone.

Response: We understand the philosophy behind your request to allow the public the opportunity to review the agency responses prior to finalizing the decision. In theory we agree this would be desirable. However, in practice this is not conducive to decision making and moving the cleanup forward. As an example, in the last revision to the Community Relations Plan the agencies tried to implement this system. Revisions to the document took nearly two years to complete. If this system was implemented across the board, it has the potential to delay any significant cleanup progress.

Comment: I am going to talk now about the Community Relations Plan and how it is written. I know most of you probably haven't had a chance to look at this. In the Community Relations Plan, they have a thing called "community background". The community background literally talks about one community called the community of the Tri-Cities--Pasco, Kennewick, Richland, Benton, and Franklin County. That is what it talks about. But it doesn't mention the down river community. "Hello," we are all affected by Hanford, in fact Hood River has more people involved with Hanford than for most of the meetings than Seattle does, which has a million population, more than Portland does, but yet downriver community or background isn't even mentioned. If this is going to be a document that is well balanced, the downriver community or background has to be referenced in here that talks about the concerns or the issues of (the) down river community. Also, the tribal communities and the tribal community background. It's not even mentioned. There are three tribes out there that have legal rights to the land, to the resources, that have to be protected and they aren't being observed. They aren't even mentioned in here. Of course, there is the regional aspect, because Hanford not only affects us here downriver or the Tri-Cities, but it affects the region, because of importation of waste and the movement of waste around there. That community background should be in there.

Response: We agree. The community background section was developed in 1989 and followed the traditional Superfund model. Through the years it has been recognized that Hanford is a regional issue, and the text has been modified to reflect the regional rather than just the local community.

Comment: Then there is another one that kind of just tweaked me. In this one, it is on page, section 3. It says, "The Science and Technology Mission." The main focus of Pacific Northwest National Laboratory, a U.S. DOE National Lab is implementing the science and technology mission, the Pacific Northwest National Laboratory is developing knowledge and new environmental technologies that make environmental cleanup faster, less expensive, and more effective with benefits targeted at the Hanford Site and the USDOE complex. It sounds like an advertisement for a promotion of the Pacific Northwest National Labs and can we get more money, and can we continue to be your favorite contractor and keep everybody else out. This isn't a public advertisement. This whole thing should be stricken. If you are going to put that in there, then let me write one too. Okay, fair is fair folks, I will put a promotion in there that kind of turns it a different way. You know that says that they do not promote less expensive and more effective, and then we'll give a whole bunch of examples, but we don't want to get into that. So basically that piece needs to be pulled out, because it is not part of a Community Relations Plan. So, that was my comment on that one.

Response: This section is intended to communicate the various resources and site facilities that exist at Hanford. The Tri-Parties agree with you that this and other descriptions in this section should be concise and objective. The agencies have reviewed this section and it has been rewritten accordingly.

Comment: The other comment is on the HAB Advice. Thirty-two people came together, rallied, wrote some consensus advise and I asked very specifically of Washington State Department of Ecology to ask the regulators that they would come to this meeting and they

would say openly to the public, yes we are going to accept all the advice from the Hanford Advisory Board or no we are going to nit pick and pick and choose we want. Is it going to go forward? I've heard nothing tonight of it. I've heard some concerns, regulatory concerns about maybe we shouldn't put it in there, maybe we shouldn't, but I was hoping while the public, there is some public here, but while the whole crowd was here, that could have been addressed up front. If thirty-two members of the Hanford Advisory Board can come to an agreement on advice, my answer is this is a no brainer. You put it in. Why? Because you have thirty-two different communities that have all agreed on the same thing. How could you say no? I don't care what some entity that's a lawyer that says we don't want to put it in here. This is a Community Relations Plan. So, that is that piece.

Response: The agencies have considered the Hanford Advisory Board advice and revisions have been made to the Community Relations Plan. See responses to Hanford Advisory Board advice on pages 1-4 of this document.

Comment: How do you respond to comment? We have an evening here tonight where we have a lot of people have put some energy into this thing and I don't want the regulators to go back into a room and figure out what they are going to pick and choose and decide on how they are going to do it. I would suggest that all the responses are given back, the questions that were asked, or the comments that we have done are clearly answered and if there is a problem incorporating them, you clearly explain why you aren't incorporating this piece. If you did it on this Community Relations Plan, it would be the first time in the history of Hanford where all of the comments came in were actually answered, fully flushed out, so we could then all come back and say, hey you know, they blew us off on this one, but that's their reason. Even if I didn't agree with the reason, at least I know I was blown off and I could go okay, that's fine, but we need to know. That need to know, then let's us understand the decision-making process and why we are all supposed to be involved in this anyway, that we are suppose to help them make better decisions. That is what public involvement is all about.

Response: We agree. We have tried to incorporate this concept into this response document and welcome your opinion on whether it meets this value.

Comment: And, one comment about the budget meetings. When we had the budget meetings here and we had the Office of River Protection, with Steve here, we had RL (the U.S. Department of Energy Richland Operations Office) here with Wade who is not here, there was a lot of resistance to respond to these documents. The resistance came from RL more so I think than ORP (the Office of River Protection), but I know Ecology was willing to move forward and EPA was willing to move forward, but I will use Wade's name right now. Wade Ballard was very resistant to giving response to all those comments. So, in the Community Relations Plan, that's why we have these things we want in there. We don't want one person or two people say, "this just creates a headache for me." Hey, that's part of the public process. I think that is the end of my comments and hopefully we will get some responses back. We'll see. Thank you.

Response: The Tri-Parties agree that a Comment and Response document should be prepared within 60 days of the end of the public comment period, when possible. If delays occur due to a large volume and/or complexity of comments, interested

citizens will be notified by mailer, the *Hanford Update* and/or the Tri-Party Agreement website at <http://www.hanford.gov/tpa/tpahome.htm>. Once the document is finalized, it will be made available to citizens who provided comments and others who request the Comment and Response document. If there are only a few comments made during a public comment period, the agencies may prepare individual letters and/or contact the commenters directly in response to comments.

23. Eric Anderson, Hood River, Oregon

Comment: I just wanted to make comment regarding the advertisements in the newspaper and this was written down but I want to make sure it gets a comment on this or gets on tape. I think the placement of the ads in the newspapers regarding public meetings are important, maybe they should be double advertised, maybe one in the back in the classified and one in the more prominent area. I think that's important. Also, I think it is important that the access to information—the public getting access to information, the correct information that they want in a timely fashion. I think that should be addressed, otherwise I think it would be difficult for a lot these meetings to really have a positive affect.

Response: The Tri-Parties agree that newspaper advertising is one of many methods used to notify citizens of upcoming public involvement meetings. In the past, the agencies have requested the advertisements be placed in the Main News section of newspapers. In addition, the agencies have advertised in newspapers that reach a large population of a community, such as the Hood River and the surrounding communities in the Columbia Gorge. The agencies welcome public input on ways to improve advertisements and placement of advertisements in newspapers. In addition, the Tri-Parties strive to provide information to citizens in a prompt manner, or before a decision is made on a key issue.

24. Cindy deBruler, Executive Director, Columbia Riverkeeper

Comment: I have a comment on the format of the Community Relations Plan. I was kind of stumbling through it and trying to figure out who the target audience of this plan was if this is a document that is actually meant for the public to learn how they can be involved. If that's one of the functions, which it appears it is, because it says it identifies several ways the public can participate, I would suggest some pretty massive revamping of the format. On page 3, you find opportunities for public involvement and then it talks about comment periods and then next section, which is the meetings, is totally separate. So it seems like if I were writing this, I would have a big header, opportunities for public involvement with either numbers or bullets. You can comment, you can attend the public meeting; these are the various types of public meetings. It is very confusing the way it is laid out here. It doesn't really have a section in the whole document that says, "Here is how to get involved: One, two, three, four, your opportunities." It really could use some basic format clarification and again I think if you could somebody outside that is maybe a newspaper writer or had journalistic abilities it could be massively improved to make it more user-friendly.

Response: The Tri-Party agencies appreciate your comments and your suggestions for improving the Community Relations Plan. One of the objectives for revising this document is to make the format more readable and understandable. We will follow your suggestions of using bullets or numbers to assist the public in understanding how they can participate in Hanford's public cleanup process. The document will not be sent out for formal editing but we will have it reviewed by an on-site editor and the public involvement staff with the goal to make the Community Relations Plan.

In the Community Relations Plan, pages three through ten describes "Public Involvement Opportunities" and identifies agency and public organizations that can be contacted for information so they can become involved. We have reviewed these sections and made revisions make them more clear and understandable.

**Community Relations Plan Public Meeting
Seattle, October 29, 2001
Approximately 20 citizens attended**

25. Raging Grannies

Comment: We've written in song and we've spoken, all over the truth on the way. No matter how recent our stance is you just keep ignoring our tale. Listen, listen heed what we're saying to you. Here us, here us, you know that our message is true. We want to be told of these visions, to reduce cleanup efforts before it's too late to take any action to impact the process once more. We want you to say to be needed, like filing another report, and alternative viewpoints considered not just as a last resort. We're tired of coming to hearings, and giving our views every year. What's the use of this public involvement, if all you contend is deaf ear? Listen, listen, heed what we're saying to you. Hear us, hear us you know that our message is true.

Response: We appreciate your comments on the Community Relations Plan. The Tri-Parties strive to collaborate with the interested public in a given location to develop the formats and agendas to have the most productive meeting possible. In addition, the Community Relations Plan recognizes the value of allowing interests outside the Tri-Parties to be a part of the agenda. The following has been revised in the Community Relations Plan, "The Tri-Parties strive to include a wide variety of viewpoints, such as an alternative viewpoint or local perspective, in all Tri-Party Agreement public meetings."

26. John Peterson

Comment: I want to make sure that the people at Hanford know about the latest 2001 rural science textbook, which goes all leading doctors in the county. It covers everything about stem cells, and how they are affected by radiation and when the stem cells, when the embryos forming, the stem cells are able to travel along the spinal cord to the place where they go and if they are affected by radioactivity out of the Columbia River or wherever, they may stop at the wrong place and you get a deformed child. All this time we have been testifying that we haven't

gotten any place as far as agreeing to one thing or the next week or month they change and we have to start over and testify again, so it appears that actually years goes by and nothing is happening. The political situation is such now that we just set a new committee under the United States' Attorney General, which could classify all this as terrorist, by just opposing what they are doing at Hanford by not cleaning it up. That is why you have fewer and fewer people testifying now that we can be classified as terrorist.

Response: Although the nation is going through tremendous change due to the events of September 11, the cleanup mission of the Hanford Site has not changed and the Tri-Parties encourage citizens to continue to be informed and involved in Hanford Tri-Party Agreement issues and decisions.

27. Barbara Zapeda

Comment: I don't know if you had time to read the obituary in the A Section in Redmond who was a scientist who tried to warn people about nuclear radiation and what it did to people. It might be in the book with me, but it was in the A Section of the Seattle Times in the obituaries. I didn't recognize his name as many times as I have been to these meetings, and I think this is one of our problems, the continuing coordinated comprehensive information. Every time we come to these things we are starting from ground zero and we do not have processes like we are spinning wheels; spinning wheels inside of wheels. It like there is no way to achieve a goal of information if your only consideration is public relations. It has to be basic information that's objective. We don't even have a baseline. I'm not worried about the Iraqi terrorist. I really am not. I lived in Hanford. I had to listen to my mother when she worked there at the lowest level trying to clean up the contamination. They called them laundry workers. She was a right wing conservative and I'm a left-winger. She was very upset because the rules at Hanford were *never* followed. Their own rules, they never followed them themselves, so information, we cannot solve a problem if you don't follow the basic laws of physics, which means you have to actually deal with facts, and not opinions. My opinion isn't that important and the point is that if we get a lot of people who have opinions but are interested in facts working together, we can achieve a solution to a problem. But I don't see it any level here. I don't see it at our local, state or federal government. We don't even know in the city of Seattle that city light, every time you pay your electric bill, you are under rank WPPSS (Washington Public Power Supply System) Plants. Alice is trying to start another nuclear plant over there for energy collection. The RCRA (Resource Conservation and Recovery Act) systems have continued to put the DOE in the situation were we have these EISs (Environmental Impact Statements) that don't end the cleanup and is separated from the cost of nuclear weapons. This is so obscene that you just feel like you are in a waiting for (*inaudible*) and there is no other way to explain it. I know we like to move the process here because we feel like we are performing, but I don't, I would really rather be somewhere else. I think we all want to achieve a goal, but we can't achieve it and that's why I say until you bring the International Atomic Energy Agency into this and start following international law, there is no way you can throw atomic energy, nuclear waste, or anthrax. It's all part of the same problem. You can raise a flag, but that doesn't protect anybody.

Response: The agencies continually strive to improve information sharing and to improve the format and content of public meetings in order to provide the public

with useful, objective information. The intent of the Community Relations Plan is to provide a guide for where information pertaining to Tri-Party Agreement issues can be obtained. The agencies also strive to respond to and include a wide variety of perspectives and expertise in public meetings and other public participation activities.

28. Evelyn Amyes

Comment: I feel strongly that a public meeting should have all of the comments recorded; all of the comments from beginning to end should be recorded on a tape recorder or by a public secretary.

Response: The Tri-Parties understand your comment and would offer that each meeting we hold is structured to allow the greatest interaction between the public and the agencies. We employ a variety of techniques to accomplish this. At times, recording the entire session may tend to restrict a free flowing dialogue.

29. Nancy Rising

Comment: Back to what I was saying about trust, I have a very great frustration about one aspect of that and I'm not sure tonight if we can certainly resolve it at all. It probably won't, but I guess it was a privilege to be part of the principles negotiation where in regard to the FFTF, wherein five people who were opposed to the restart of FFTF met with five people that were in favor. It was a very interesting time and I won't go into that, but one of the very fascinating parts of it, was that there were people from the Secretary of Energy's, Department of Energy that were there for the discussions and there was a great deal of surprise on the part of those federal people. In one discussion I had about the format of the public hearings, wherein I said if they continued on in the same way there was going to be more violence and as far as I was concerned it would be on their heads and they could be the defendants in the lawsuit. They said, "What are you talking about?" So I told them. They were shocked that this is how our meetings were being held. Secondly there was a great deal of surprise prior to that, by the Secretary of Energy, about how people felt about Hanford because he was not aware about how many people felt about Hanford. So, what I am alluding to is, we can turn everybody out and we can do everything we want, we can stand on our heads and we can record everything, but if those things are not going to be reported, up the line and dare I say lied about, what damn difference does it make? Is it just to wear us down, is that it? We will quit caring after they've gone to 15 meetings and in five months. I don't think you people are feeling that way, but if the information that is transmitted up to the top where some of these decisions are finally made is not accurate for whatever reason, I won't even get into that, then it makes absolutely no difference. This is why perhaps maybe why I sound so cynical, but it comes to trust. I have seen it first hand by the people who are making decisions were shocked to death by some people didn't just think Hanford was so wonderful. Now that information I'm sure came from those who thought Hanford was wonderful at the (Hanford) site and transmit those people love it. Eat radioactivity with their breakfast cereal. They think it's terrific. So, somewhere back to trust. If they make a political decision to do something that we are opposed to, okay I will be mad as I can possibly be and I'll write lots of letters and I'll call our Congressman, but that's a different thing than not having accurate

information to start out with. I think we better talk to that, because there's a lot of people that understand that. Sorry this took so long, but I'm really angry now that I think about it.

Response: The Tri-Parties are aware that there are citizens who are dissatisfied with the progress at Hanford; however, the agencies believe that continued involvement of the public has a tremendous effect on the cleanup effort at the site. Over the years, public comments and advice from the Hanford Advisory Board on the Tri-Party Agreement and the USDOE budget have been instrumental in the continued funding and cleanup of the site.

30. Adam Nearman

I just wanted to say I think that all the applicable state and federal laws, like NEPA and MTCA, or whatever laws that are reported in there should be included in the Community Relations Plan. Especially with this the regulatory framework, make it easy to understand what goes on to the public and what happens, because I have trouble understanding the regulatory framework.

Response: The laws that pertain to the Tri-Party Agreement are included in Appendix A of the Community Relations Plan, including the Model Toxics Control Act.

31. Kay Hill

Comment: I want to express our support from the Heart of America proposals to include alternative presentations and hearings and to give us adequate, ample pre-notice before any decisions are made so that we can respond in a timely fashion. I would also support what Nancy (Rising) said. I guess I have arrived at the very cynical viewpoint that it doesn't really matter what we say, we have had, about restart of the Fast Flux Test Reactor ample evidence to support the fact that it needs to be shut down, and yet every time we turn around there is a new political decision to restart it, and it has nothing to do with the agency people or us as the public, it is a political decision. I guess until we can muster enough support to change the politics in Washington, we're going to be stuck with the results. But in the meantime we are going to be polluting the Columbia River and creating a lot more damage and make it a lot more difficult to clean up the mess. It is a tragedy in the making.

Response: The USDOE is aware there are many citizens in the northwest who oppose the restart of the Fast Flux Test Facility. In December 2001, the USDOE announced that the reactor will not be restarted and the Department will proceed with facility deactivation. Regarding the notification process, the following has been added to the Community Relations Plan, "The Tri-Parties will strive to notify stakeholders 30 to 45 days before the start of a public comment period or before a public meeting." Regarding the alternative viewpoint, the following has been revised in the Community Relations Plan, "The Tri-Parties strive to include a wide variety of viewpoints, such as an alternative viewpoint or local perspective, in all Tri-Party Agreement public meetings."

APPENDIX A

Flipchart Notes from the Seattle and Hood River Public Meetings

Introduction: The following table represents public comments received at the Hood River, Oregon public meeting held on October 20 and the Seattle, Washington public meeting held on October 29. Citizens provided recommendations on how to improve current public involvement processes as well as comments on the current version of the Community Relations Plan. These comments were taken down on flip charts and transferred into the table below. Many of these comments have been responded to within the main portion of this document, so the page where the response is located is referenced. If the comment has not been addressed within the document or if there is additional information, then a response is provided within the table.

| Public Comment | Response Reference Page(s) | Additional Response |
|---|---------------------------------------|---|
| HOOD RIVER PUBLIC MEETING | | |
| Public Notice <ul style="list-style-type: none"> • “Voter Pamphlet”--more than one perspective in reading materials • Public Service Announcement or press releases to the meeting location is an effective tool and notice to employees | Pages 10-13, 28-29, and 31-35 | |
| E-Mail Notices <ul style="list-style-type: none"> • Use e-mail announcements--access link to go for information • E-mail with option to information and comment • E-mail notice--website links with information • Website notifications and response page. Type in comments right then. | Page 31 | The Tri-Party agencies are investigating the availability of electronic notification of public involvement activities. |
| What ads draw attendance? <ul style="list-style-type: none"> • Content/relevance • Placement within paper • Methods: DOE mailing, Columbia Riverkeeper notice, word of mouth, Hood River paper • Ads that draw eye work; still need to work on content. • “Why should the reader care?” Kooky designs work • The content of the ad gets attention, clear, concise and relevant. • List the issues in the ad--compassion in the middle--make it relevant. • Consider/use an ad expert or graphic artist • Use someone besides government worker to develop ads | Pages 10-13, 28, 32-35, and 41 | |

| Public Comment | Response Reference Page(s) | Additional Response |
|---|--------------------------------------|--|
| HOOD RIVER PUBLIC MEETING | | |
| <ul style="list-style-type: none"> Seattle Public Meeting: Ad cost versus turnout--if ads are more effective, more people may attend. | | |
| <p>Advertisement Placement</p> <ul style="list-style-type: none"> What constitutes good placement and timeliness of ads? Human Resources--Saturday/Wednesday or both? Location/placement in the paper is important for an ad--why I should care? Use expressive words Newspaper ad placement important--double posting, both in classifieds and display Mid-week paper in Hood River is read most | Pages 35 and 41 | |
| <p>Do fact sheets have value?</p> <ul style="list-style-type: none"> Are they readable, understandable, and useful? Do they draw attendance? Bring in outside person to draft information, ads, etc. Figure out what the goal is and build from the ground up Separate designer. Catchy phrasing and identify target audiences | Pages 10-13, 28, and 32-35 | The agencies agree that informational materials must be understandable and useful for the public. The agencies continually strive and seek input to improve the content and format of all outreach materials. |
| <p>Access To Information/Response</p> <ul style="list-style-type: none"> Citizens should have the right to information related to Hanford cleanup decision before comment period ends Citizens should have right to receive written response to specific comments within 60 days, preferably before the decision has been made The core issue of the meeting is why are comments not sent back to commenter | Pages 3, 18-19, 28, and 36-41 | |

| Public Comment | Response Reference Page(s) | Additional Response |
|---|--|--|
| HOOD RIVER PUBLIC MEETING | | |
| <p>Access to Information</p> <ul style="list-style-type: none"> • Access to finding information on website is difficult to find • Simplify how to find Comment and Response documents • Agencies should check how access-friendly the Hanford information is. • Access should be timely | <p>Pages 19, 28, and 34</p> | <p>The agencies include website addresses on the majority of materials distributed to the public, as well as continually attempting to make information accessible. The agencies will continue to make as much information as possible available in an easily accessible format.</p> <p>The format of Comment and Response documents varies based on the nature of the issue. The agencies will continue to strive to draft reader-friendly documents.</p> |
| <p>What processes can be used to make this process work for public agencies?</p> <ul style="list-style-type: none"> • Agency representatives should be able to answer the specific questions, or receive an answer. Address comments to a specific person | | <p>Due to the highly technical nature of many issues, not all questions can be answered by a single agency representative. However, when the agency representative is not able to provide an answer during a public meeting, the agencies will follow up after the fact.</p> |
| <p>Public Meetings</p> <p>How and when should public meeting be held?</p> <ul style="list-style-type: none"> • If 10 or more people request a meeting • Right to alternative viewpoints at meetings • An individual representing an organization or ten or more people can request a public meeting | <p>Pages 2-3, 17-18, 22-28, 34-35, 42, 44, and 46</p> | |

| Public Comment | Response Reference Page(s) | Additional Response |
|--|--|---|
| HOOD RIVER PUBLIC MEETING | | |
| <p>Do Organizations equal Multiple People/Requests?</p> <ul style="list-style-type: none"> • How do groups request meetings? • Tri-Party Agreement Quarterly Public Involvement Planning meeting • Hanford Advisory Board • Personal contacts • Suggested Language: One organization representing number of citizens, or ten or more people request | <p>Pages 2-3, 18, 27-28, 30-31, and 34-35</p> | |
| <p>Decision-Making Processes</p> <ul style="list-style-type: none"> • Original Process--Regularly Scheduled "State of Hanford" • Budget process enough? What solutions? • Citizens have the right to be told of comments on decisions that reduce cleanup standards | <p>Pages 20, 29, 32, and 34</p> | <p>The Tri-Parties agree that regular update sessions on the status of Hanford cleanup are a good idea. Therefore, the agencies' top decision-makers will participate in a series of regional meetings in January to discuss the State of the Hanford Site. The agencies hope to make this an annual process if it proves to be a useful tool for the public and the agencies.</p> |
| <p>Regulatory Framework</p> <ul style="list-style-type: none"> • Integrate public involvement processes for all state and federal laws. • Community Relations Plan should meet same public notice and include requirements as other sites required to follow • Environmental Impact Statement—National Environmental Policy Act/State Environmental Policy Act public involvement should be same as Community Relations Plan | <p>Pages 1-2, 12-17, 45</p> | |

| Public Comment | Response Reference Page(s) | Additional Response |
|--|--------------------------------|---------------------|
| HOOD RIVER PUBLIC MEETING | | |
| <ul style="list-style-type: none"> • Community Relations Plan should reflect northwest public needs • Incorporate language that reflects all site public involvement, not just Tri-Party Agreement language and state and federal government work out issues • Integration needs to be in plan so it can be enforced. • Agency responsibility: ensure coordination and compliance by DOE-HQ with local processes and list in Community Relations Plan so agency follows its documented process | | |
| <p>Regulatory Requirements</p> <ul style="list-style-type: none"> • Chart that shows how the process works--where we are • Integrate public involvement processes under one document • Community Relations Plan should reflect public involvement processes for all regulatory required needs that reflect northwest public's expectations • Need enforcement guidelines in the plan to ensure adequate notice, etc. • Heart of America Northwest would like to discuss in more detail by providing suggestions • Need good facilitation • There are other means--informal meetings that can/should happen because they provide timely information outside of requirements | Pages 1-2, 12-17 and 45 | |

| Public Comment | Response Reference Page(s) | Additional Response |
|---|---|---------------------|
| HOOD RIVER PUBLIC MEETING | | |
| <p>Hanford Advisory Board Advice and the draft Community Relations Plan</p> <ul style="list-style-type: none"> • Include language from the “Bill of Rights” • Hanford Advisory Board advice should be considered • Hanford Advisory Board advice: After all public comment... December Board meeting final response--All agencies. Legal aspects-attorneys, EPA okay with the rest • Include names on public comment response document • Frustration with process • The public should say how responses occur • Provide direct response to individuals • Answer the question directly • Information should be free-flowing • Community Relations Plan community background; balance representing the river community; tribes; etc. • Hanford Advisory Board advice: will it be used or not? State up front • Comment and Response document--don't go into a room to decide a response--make them clear and why and how comments are used • Format of Community Relations Plan needs revamping. Big header with numbers or bullets calling out key information | <p>Pages 1-4, 21, 27-29, and 37-41</p> | |

| Public Comment | Response Reference Page(s) | Additional Response |
|---|--|--|
| SEATTLE PUBLIC MEETNG | | |
| <p>Public Notice</p> <ul style="list-style-type: none"> • Agencies should make it easier/clear on how to get on the mailing list • Effective notice equals clear/concise (plain language) explanation of issue, potential impacts, multiple methods, external design • Show <i>why</i> attendance is important • Sierra Club didn't get a notice--30 days isn't soon enough (need 2 to 3 months notice) • Provide a timely reminder --follow-up • Most hear due to phone tree--need more notice • Advance notification • Did not receive notice and I've been at meetings for years. Should be easier to contact/get on a notification list • Provide notice to organizations for monthly newsletter. Need almost two months lead time • Advance notice plus timely reminder • Organizations need lead time for information sheets • Need additional lists; more than two mailing lists. Segment by interest • Short and to the point--e-mail, TV news, northwest public radio • TV news, public radio; Public Service Announcements; Ad costs should not preclude their use | <p>Pages 10-13, 28-29, 31-35 and 41</p> | <p>The agencies agree that is should be clear how to get on the mailing list and what a recipient will receive. The section of the Community Relations Plan pertaining to the Hanford mailing list has been revised (See page 1 of the Community Relations Plan) and the sign-up lists for public meetings will be revised to make it more understandable. (Newsletter notice – 2 months)</p> <p>The agencies agree that timely notification is necessary for maximum public participation. The agencies provide information on upcoming public participation activities during the Tri-Party Agreement Quarterly Public Involvement Planning Meetings, and when possible, also provide this information to public interest groups as far in advance as the information is available. (More than two lists/electronic notifications)</p> |

| Public Comment | Response Reference Page(s) | Additional Response |
|---|--|---|
| SEATTLE PUBLIC MEETING | | |
| <ul style="list-style-type: none"> • One Northwest--Building website lists • Public Service Announcements--Northwest Public Radio • Make notice effective with written friendly language • Press releases to the press • Send notice electronically and written • Electronic flier/notice--email, newsletters, etc. • Place in local news station • Government doesn't want us to understand what they are doing. • "Significance" (of issue) should be made clear | | <p>The Hanford mailing lists are quite large and the agencies do not have the resources to further segment and maintain the lists. However, the agencies are beginning to implement electronic notification methods for specific areas of interest when requested.</p> |
| <p>Advertisements</p> <ul style="list-style-type: none"> • Ad placement important • Ads should have key words "Hanford" • Why in the Weekly vs. Seattle P-I or Times? • E-mail ads • Ask Simpson creator for help • Simpsons – Matt Groenig • Notice to major universities--school papers --for example, University of Washington Daily • University newspapers, radio | <p>Pages 35 and 41</p> | <p>The agencies agree that providing notice to universities and their school newspapers and/or radio stations could help improve participation. The agencies will implement this strategy whenever possible.</p> |
| <p>Public Meetings</p> <ul style="list-style-type: none"> • Public comment during meeting should be earlier on the agenda • Public comment at top of meeting • Effective opportunity for alternative view, input on agenda development (Regional budget meetings) | <p>Pages 2-3, 17-18, 22-28, 30-35, 42, 44, and 46</p> | <p>The format and agenda for public meetings is typically determined through consultations with interested stakeholders who have demonstrated an interest in participating. The agencies continually strive to conduct meetings in a manner that is most beneficial to the</p> |

| Public Comment | Response Reference Page(s) | Additional Response |
|---|----------------------------|---|
| SEATTLE PUBLIC MEETING | | |
| <ul style="list-style-type: none"> • Meeting process is important--make reasonable opportunities for comment. Make it a benefit for the public, not a benefit for agencies • How to determine need for public previous standard--ten people request • Internal process for agency decisions should be public knowledge • Provide more information on how to comment and how to access info, etc. • Clear understanding needed of how meeting formats are determined • More information at what discussion topics • How much value is attributed to public comment • Share how input is used—Comment and Response document • The voice should come from local public interest groups • Responsiveness and accountability is key • Meeting requests should be more objective • Use objective standard to determine (ten people) whether meeting, etc. is planned • Share meeting format and agenda with public in advance • Local/alternative views should be made • State up front the time per speaker--recognize new speakers first • Let people know ahead of time how much time available to speak (i.e., three to five minutes) | | <p>public. The agencies will continue working with interested members of the public to develop the format and agenda for meetings to achieve a balance between placement and time allotments for presentations and public comment.</p> <p>The amount of time provided for public comment is not always known prior to the start of the meeting. Typically, the amount of time available per person depends on the number of attendees wishing to provide public comment.</p> <p>The agencies agree that all members of the public should have equal opportunity to provide comment and that repeat participants should not be allowed more time than others. The agencies will evaluate methods for determining appropriate changes.</p> |

| Public Comment | Response Reference Page(s) | Additional Response |
|---|---|--|
| SEATTLE PUBLIC MEETING | | |
| <ul style="list-style-type: none"> • At multiple meetings, speakers should only be allowed one opportunity--not using same exact comments at all meetings • Listen, listen, tell us of decisions, timely notice, provide alternative perspective (Ragging Grannies Song) | | |
| <p>Access to Information/Response to Comment</p> <ul style="list-style-type: none"> • Videotaping • Send responses within 60 days • Response documents--include comments as submitted (quote verbatim) rather than breaking comments into separate areas • Comment structure--provide opportunity to sign up and/or provide address • If I respond via e-mail I want a response by e-mail • Comments--tape recorder • Textbook on stem cell research • Document input • Decision-makers should read, hear, or be present for comments • Preliminary activities (effective notice and meetings) useless without adequate response • Without adequate access to information, interest groups can't evaluate risks • If information not received timely--extend comment period or stop decision • Timely response (within 60 days) allows for increased dialogue | <p>Pages 3, 18-19, 28, 31, and 36-41</p> | <p>The agencies do not have the resources to videotape all public meetings and transcribe the contents.</p> <p>Agency decision-makers provide input on how comments will be responded to, and receive Comment and Response documents for signature before the documents are finalized.</p> <p>Comments received via e-mail receive an acknowledgment via e-mail and/or; additionally, if that is the only contact information provided, the Comment and Response document will be distributed via that method.</p> <p>Contact information is provided in public notices prior to a public involvement activity and in follow-up notices after the public involvement activity is completed. Notices can be sent in the mail or posted on the Tri-Party Agreement and agency web sites.</p> |

| Public Comment | Response Reference Page(s) | Additional Response |
|---|--------------------------------|---------------------|
| SEATTLE PUBLIC MEETING | | |
| <ul style="list-style-type: none"> • Community Relations Plan should include requirement for length for response. • E-mail comments should receive acknowledgement; e-mail response • Make clear who can be contacted for copies of documents | | |
| <p>Regulatory Framework</p> <ul style="list-style-type: none"> • Topic is confusing • Proper notice, akin to Tri-Party Agreement process in Community Relations Plan should be followed for all regulatory processes (Environmental Impact Statements, etc.) • Basic guidelines should be followed • Diagrams don't show the Model Toxics Control Act requirements--list other regulating processes • Community Relations Plan should lay out public involvement requirements for all relevant cleanup regulations. (i.e., Model Toxics Control Act land-use restrictions) • Environmental Impact Statement public process requirements should be as strong as Tri-Party Agreement/Community Relations Plan requirements • Theme: All Hanford decisions/public involvement should be legally enforceable under Community Relations Plan and Tri-Party Agreement | Pages 1-2, 12-17 and 45 | |

| Public Comment | Response Reference Page(s) | Additional Response |
|---|----------------------------------|---|
| SEATTLE PUBLIC MEETING | | |
| <ul style="list-style-type: none"> • Add flowchart for the Model Toxics Control Act and National Environmental Policy Act in the Community Relations Plan • Have earlier, timely notice and information sharing/access | | |
| <p>Public Involvement Issues</p> <ul style="list-style-type: none"> • We should have “chats” about what we should do to address disbeliefs and determine if there is any progress at Hanford. Need trust to be established • Need to create atmosphere of trust • Early public involvement crucial • Make sign-up sheets clearer <ul style="list-style-type: none"> --Big list or smaller list | Pages 2-3, 10, 17, 28-33. | <p>The Tri-Parties agree that regular update sessions on the status of Hanford cleanup are a good idea. Therefore, the agencies’ top decision-makers will participate in a series of regional meetings in January to discuss the State of the Hanford Site. The agencies hope to make this an annual process if it proves to be a useful tool for the public and the agencies.</p> <p>The agencies agree to make the sign-in sheets and sign-up for mailing list sheets more clear.</p> |