

# HANFORD ADVISORY BOARD

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

**Advising:**

US Dept of Energy  
US Environmental  
Protection Agency  
Washington State Dept  
of Ecology

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February 6, 2009

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Re: Public Comment Period Considerations for the Tank Closure & Waste  
Management Draft EIS

Dear Ms. Olinger, Mr. Brockman, and Mr. Manning,

## Background

The Hanford Advisory Board (Board) has closely followed the development of the Tank Closure and Waste Management Environmental Impact Statement (TC&WM EIS). Decisions that will be made based on the analysis in this document will have significant impacts on the cleanup remaining at Hanford and will influence the level of perpetual care, monitoring and oversight that will be necessary for hundreds of years into the future.

From all accounts, this will be a lengthy and technically complex document. A thorough and rigorous analysis of the TC&WM Draft EIS is essential to ensure that good decisions are made. It is also important for the public to fully understand the range of important decisions that will ultimately be made based on the analysis and conclusions contained within this document.

The Board and its various members expect to play a role in helping the public to understand the TC&WM Draft EIS. To do so, we will need the assistance of the U.S. Department of Energy (DOE) to help us understand the document and to work with us in developing a coordinated plan for soliciting public comment.

### **Advice**

- The Board strongly encourages DOE to allow a minimum 120-day review/comment period once the TC&WM Draft EIS is publicly released, with the option to extend. The length and complexity of the document, along with the important decisions that will be based on this document, require that the public be provided with a fair opportunity to thoroughly review the TC&WM Draft EIS and consider its implications. The standard 45-day review period is not adequate. DOE has taken years to complete the TC&WM Draft EIS. There is no reason the public review process needs to be compressed to meet an artificial internal DOE schedule.
- Within two weeks after the TC&WM Draft EIS is released, DOE and the Washington State Department of Ecology (Ecology) should conduct a one to two day informational workshop for the Board and other interested parties in the Tri-Cities to thoroughly explain and discuss the key contents of the document and the key decision points. This will help Board members to conduct their own analysis and prepare comments on behalf of their member organizations. Board member organizations will also be better able to develop and distribute public information materials to help inform and prepare the public to provide comments. The Public Involvement and Communications (PIC) Committee is willing to assist DOE and Ecology in designing this workshop. We believe the dialogue that occurs at this workshop will also likely assist DOE and Ecology in developing their own public information materials for the public.
- No earlier than 75 days after release of the TC&WM Draft EIS, DOE and Ecology should conduct a series of public hearings across the region to solicit public comments on the document.

- DOE and Ecology should work with the PIC Committee to determine the number and location of public hearings. DOE and Ecology should also work with the PIC Committee to review and help shape DOE and Ecology presentations that are provided at these public hearings.
- Notices, advertisements, and background material developed for the workshop and public hearings must clearly inform the public of major decisions that will ultimately be made based on the analysis and conclusions contained within the TC&WM Draft EIS. As examples, these public information materials should explain the implications of bringing new waste to Hanford for disposal or leaving wastes in underground storage tanks or soils. These public information materials should also inform the public of how public concerns and values may be impacted by proposed decisions.

Sincerely,



Susan Leckband, Chair  
Hanford Advisory Board

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

cc: Elin D. Miller, U.S. Environmental Protection Agency, Region 10  
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