



Oregon

Tina Kotek, Governor



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Re: Holistic Negotiation Comment Period Extension Request

On behalf of the Oregon Department of Energy and the Oregon Hanford Cleanup Board, I am writing to request an extension of the public comment period regarding Tri-Party Agreement and Consent Decree changes related to the “holistic negotiations agreement.” The scope and consequence of the agreement is one of the most anticipated and significant risk reduction actions at the Hanford site in recent memory. After four years of negotiations by the Tri-Party Agencies, 60 days is simply inadequate for Oregon and other interested parties to understand the agreement and meaningfully comment. Additionally, the public meetings scheduled to be held the week of July 9-11 would only allow three weeks from those meetings to the currently-scheduled August 2 deadline. We suggest a 120-day comment period, closing on or about October 1, 2024.

Actions proposed by the holistic negotiations agreement would potentially lead to substantial impacts to Oregon, specifically the shipments of tank waste from Hanford to offsite disposal locations in Utah or Texas. The holistic negotiations established a timeline for DOE to propose treatment and transportation plans later in 2024. However, we know from the recent Supplemental Low Activity Waste study overseen by the National Academies of Science that tank waste shipments will most likely go through Oregon, either by truck or rail, and possibly still in liquid form. According to the rail routes outlined in the National Academies report, if the waste is shipped by rail to Utah, the route would go through central Oregon: through communities that are not currently tracking any Hanford activities because they are not affected by Hanford activities at this time. The rail lines under consideration go through Bend (the fastest growing city in Oregon), and through two Tribal nations and their ceded lands not previously consulted regarding Hanford (Confederated Tribes of Warm Springs and Klamath Tribes). Also, even if shipped by truck along the more traditional I-82/I-84 freeway route, those communities have not had sufficient time to evaluate and understand the consequences of shipments of liquid Hanford tank waste, and should be informed. Finally, we note that any truck

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shipments of Hanford tank waste on I-82/I-84 would be in addition to shipments of Hanford transuranic waste that will also travel via truck through eastern Oregon enroute to disposal in New Mexico in the coming years.

Oregon has long supported disposing of Hanford waste outside of the northwest. We have also maintained that shipments must be done with full transparency, openness, and information-sharing, and alongside safety and emergency response training for local communities.

It is for these reasons that we are seeking a comment deadline extension: in order to share information with the Oregon communities and Tribal Governments that would be affected by the holistic negotiations agreement.

Thank you for your consideration.

Regards,

A handwritten signature in purple ink that reads "Maxwell Woods".

Maxwell Woods

Oregon Department of Energy

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CC:

Jeff Wyatt, Chair, Oregon Hanford Cleanup Board

Steven Bedrick, Vice-Chair, Oregon Hanford Cleanup Board