



*Many Voices Working for the Community*

# Oak Ridge Site Specific Advisory Board

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April 15, 2002

Ms. Martha Crosland  
Director, Office of Intergovernmental and  
Public Accountability  
DOE/HQ EM-11  
Room 1-H-087  
1000 Independence Avenue, SW  
Washington, DC 20585

## **Public Participation Issues in the Review of the Environmental Management Program Dated February 4, 2002**

Dear Ms. Crosland:

The Oak Ridge Site Specific Advisory Board (the Board) reviewed the February 2002 "Review of the Environmental Management Program." The Board agrees with the majority of the findings and recommendations of the Top-To-Bottom Review Team, and we support the accelerated risk-based cleanup and closure approach to environmental management. However, the Board does have concerns with several of the Review Team's findings and recommendations.

With regard to item 11, we take issue with the Review Team's finding that "State, community, and stakeholder support" (third bullet, page v-26) is an activity "... that may not be appropriate for an accelerated, risk-based cleanup program" and that such activity is "...in addition to EM's core cleanup mission." Under CERCLA, public participation is an integral part of decision making and in Oak Ridge it has had a significant positive impact on keeping the parties to the Federal Facility Agreement focused on remediation activities. Furthermore, we believe that stakeholder involvement in the "core business" of EM has lessened the potential for legal actions that would drain resources away from risk reduction activities. Rather than delaying remediation, we believe that community involvement contributes to an accelerated risk-reduction program.

The Board believes that DOE-ORO's support of community and stakeholder involvement in the EM program has benefited DOE and the community in many ways. Most importantly, it has resulted in a common understanding of remediation activities and of the "give and take" that is needed for effective remediation of the Oak Ridge Reservation. It has transformed an environment of mistrust into one of cooperation, and it has resulted in public acceptance of remediation and initial planning for long-term stewardship.

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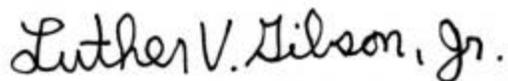
One example is the ORO-EM supported End Use Working Group (EUWG), a community-based group in Oak Ridge of about 20 stakeholders that worked for a year and a half and provided DOE with widely-endorsed recommended end uses for contaminated areas on the Oak Ridge Reservation. When EUWG members realized that “cleanup” would result in residual contamination, a Stewardship Working Group formed which also was supported by ORO-EM. This group wrote two documents that describe a community-based approach to stewardship for contaminated areas. These documents form much of the basis for the current DOE Long-Term-Stewardship Strategy.

In addition, we want to mention two recent activities that are not directly related to the EM program, but which we believe would not have been possible without the successes of the previous EM efforts and the spirit of community involvement that they spawned. These are a DOE ORO Land Use Planning Focus Group – a diverse group of community leaders convened to recommend land use for the Northwest corner of the Reservation, and the recent publication of “Oak Ridge, Tennessee – A Citizen’s Guide to the Environment” a report written by community members without any DOE support. The report describes Oak Ridge and the relationship and effects of DOE on the community. It is dedicated to providing an unbiased, factual account of life in Oak Ridge and was supported by 30 local organizations.

For those communities that must live with hazardous and radioactive contamination in their backyards, it is hardly inappropriate or an unnecessary addition “to the core cleanup mission” to provide support for state, community, and stakeholder participation in EM activities. The benefits of community involvement and support far outweigh any costs.

We thank you for the opportunity to provide feedback on this report and look forward to continuing to work closely with DOE to implement this important work.

Sincerely,



Luther V. Gibson, Jr.  
Chair

Cc: Gerald Boyd, DOE/ORO, Assistant Manager for EM  
Pat Halsey, DOE/ORO, ORSSAB Federal Coordinator  
Ms. Connie Jones, EPA Region 4, Program Manager  
Ms. Jessie Roberson, DOE/HQ, Assistant Secretary for EM  
Mr. John Owsley, TDEC, Director  
Mr. Justin Wilson, State of Tennessee, Deputy to the Governor for Policy