



Oregon

Tina Kotek, Governor



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Dear Tri-Party Agency Representatives,

Oregon appreciates the opportunity to provide comment on this foundational milestone series which will guide cleanup progress at Hanford to completion. If implemented well, the strategy which was so clearly presented in the 1/13/26 public meeting, will result in a deliberate and successful cleanup while increasing the chances to find efficiencies. The last milestone that US Department of Energy Environmental Management will have to complete before handing the Hanford keys over to Legacy Management is included in this new M-100 series, and it is apparent that the negotiation team want to get to that point of successful cleanup as quickly and efficiently as reasonable. Since success for these milestones means that there will not be another major comment period on the M-100 series for generations, we have some suggestions to help communicate progress and opportunities for improvement to the great grandchildren of today's workforce.

The cleanup milestones that the M-100 series seeks to replace segmented the daunting Hanford cleanup tasks at hand into separate boxes so they could be tracked and completed. M-015 was the "measure twice" milestone – complete investigations for waste sites to know what needed to be done. M-016 was the cleanup action – implementing the tasks informed from the investigations. Finally, M-085 was for the built environment – changing the skyline by safely dispositioning the canyon facilities. This idealized structure worked reasonably well in in the River Corridor, since these areas were designed to be isolated. There were challenges, but the sequential methodology fit. While there are still major tasks to be completed along the river, progress has moved the focus in the upcoming decades to the Central Plateau. The waste sites and operable units are stacked on top of one another, and surrounded by infrastructure, operating facilities, waste management areas, and giant concrete monoliths. In a given vertical cross-section, there could be projects that have milestones to investigate one waste site, remediate another, and also to deal with the building over both of them. This reality along with funding and resource constraints resulted in the majority of milestones being missed or put "in abeyance", with no path forward for successful completion.

The proposed M-100 series takes most of the remaining cleanup tasks and tosses them into one pile. The TPA agencies will meet every year to pick the priorities out of the pile and add them as near term - within 5 years- milestones. At each meeting they will confirm that there is time and money to complete those near-term milestones and talk about what is on the horizon. Then every five years, they will work on at least putting rough groupings together with the remaining projects, so nobody loses track of the path to completion. This strategy allows the conflicts in the cross-section mentioned before to be resolved – if something needs to happen at a building before characterization at one waste site and cleanup at another, the negotiating team can build that sequencing into the milestones, allowing work to be completed efficiently.

The M-100 strategy has a better chance of optimizing workflow to fully complete cleanup faster. There are a few unintended consequences of the structure though. As mentioned previously, there will be little room for public comment on the milestones themselves, even with comment periods on CERCLA documents. The TPA negotiation meetings will not be open to stakeholders, Tribal Nations, or the public

until the meeting minutes are published. Finally, the long-term scope, schedule, and cost estimates presented in the Lifecycle Report every three years may not be sufficient to ensure a long-term planning strategy that is as realistic as feasible given the uncertainties of the distant future. Oregon provides the following suggestions to mitigate the inherent isolation that the TPA negotiation process necessarily creates:

- Create a visualization page that presents a rough timeline of the remaining milestones expected completion. As the picture is refined, update the visuals, but keep an archive to show how progress and priorities have shifted.
- As milestones change and adapt, keep and publish a change log so the frequency and magnitude of these changes is preserved. With prior milestone series, it was a challenge to recreate how the milestone due dates changed over time. This new adaptive process should reduce the magnitude of the changes, and documenting that allows the agencies to show improvement.
- Provide an annual summary of the near-term milestone schedule to some public forum. This could be a presentation at a Hanford Advisory/ or Oregon Hanford Cleanup Board meeting or a standalone webinar/public meeting. Sharing the rationale for the snapshot in time will provide context and help to build trust in the cleanup process.
- Following the presentation, incorporate an ask for input into the annual cleanup priorities and/or 5-year placemat comment periods. The TPA agencies can then take this feedback into the negotiating session for the following year.
- Ensure that funding assumptions in the Lifecycle report align with those being considered by the negotiation team.
- The success of this multi-generational milestone series relies on the ability of the negotiation team to communicate the institutional knowledge to their successors. Since staffing changes are not always predictable, develop a consistent and comprehensive documentation process for what the negotiation team is thinking – not just for near term milestones but for those many decades in the future. Why is the sequence the way it is and what could change that?

The proposed changes to the TPA structure for cleanup milestones set a foundation for future success built on collaboration and a common goal. The near-term milestones beginning in 2026 are intuitive and Oregon is excited to see enforceable and achievable milestones for characterization of Central Plateau waste sites. It is apparent that the team responsible for negotiating and presenting the M-100 milestones knows the challenges that face cleanup at Hanford and have put forth a framework with the greatest chance of success. All of the negotiating team – including those who left the TPA workforce before the finish line – have shown foresight and dedication to cleanup and should be commended for this work.

If you have any questions about these comments, please contact me or my assistant director, Max Woods (maxwell.woods@energy.oregon.gov).

Sincerely,



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CC:

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