



February 6, 2026

Comments Submitted Electronically at:
<https://nw.ecology.commentinput.com/?id=MF9cbJZre>

Washington State Department of Ecology
3100 Port of Benton Boulevard
Richland, Washington 99354

RE: Proposed Milestones and Approach Towards Final Cleanup

To Whom It May Concern:

Thank you for the opportunity to submit comments on the Proposed Milestones and Approach Towards Final Cleanup.

Hanford Challenge is a non-profit, public interest, environmental, and worker advocacy organization located in Seattle, WA. We are an independent 501(c)(3) organization incorporated in the State of Washington since 2008 and registered in Oregon. Our mission is to create a future for the Hanford Nuclear Site that secures human health and safety, advances accountability, and promotes a sustainable environmental legacy.

Hanford Challenge has members who work at the Hanford Site. Other members of Hanford Challenge work and/or recreate near Hanford, where they may also be affected by hazardous materials emitted into the environment by Hanford. All members have a strong interest in ensuring the safe and effective cleanup of the nation's most toxic nuclear site for current and future generations, and who are therefore affected by conditions that endanger human health and the environment.

Cleanup delays are an unfortunate part of Hanford cleanup. Hanford Challenge is not opposed to trying a new approach to set more realistic and achievable milestones. We are optimistic that the M-100 milestone series will allow the agencies to set more realistic milestones that ensure cleanup work is completed on time. However, we continue to believe that deeply entrenched systemic issues and budget shortfalls are two of the main reasons why milestones are missed or delayed. The Tri-Party Agreement (TPA) agencies must identify these systemic issues of chronically missed milestones to develop effective solutions that will prevent further delays to Hanford cleanup. We hope the agencies take the opportunity to address these systemic issues and attempt to resolve them during the prescribed one-year and five-year meetings.

Hanford Challenge believes that more collaboration and communication amongst the TPA agencies on cleanup milestones will be beneficial. We appreciate the presentation and Q&A at the public meeting on January 13 and to the Hanford Advisory Board on January 14. The presenters openly talked about the proposed changes, were prepared, and took the time to answer all the questions in the room. Unfortunately, the complexity of cleanup milestones is difficult to understand, and this new Adaptive Milestone approach is no exception. For a cleanup that will extend beyond our lifetimes, it is critical that the public be involved, that the agencies clearly articulate the Adaptive Milestone approach as it is developed, and provide meaningful opportunities for input.

Please take the following comments into consideration.

- **Add a new Milestone Establishing a TPA Milestone Parking Lot:** Deleted milestones need to be tracked in a publicly accessible document. Please add a new milestone that establishes a document in the TPA that acts as a parking lot for deleted milestones that have yet to be added to the M-100 series. This work is multi-generational, and the parking lot would ensure milestones are tracked and institutional knowledge is passed down.
- **Increase Transparency:** The M-100 milestone series creates new, near-term milestones and long-term milestones but the agencies will continue to create new milestones and replace others as they meet annually. While this approach appears to be nimbler to budget changes and cleanup setbacks onsite, it reduces transparency for the public.

By deleting the M-15, M-16, and M-85 milestone series and creating a completely new M-100 series, the specificity and detail of the various cleanup activities is lost. It is unclear what cleanup work is being negotiated and planned during the one-year meetings and five-year meetings. When the agencies were asked about this during the public meeting on January 13, they suggested that the public look to the Lifecycle Scope, Schedule, and Cost Report to know what work the agencies will be negotiating. However, the Lifecycle Report is misleading as it includes for example, the tank waste cleanup and transuranic waste cleanup, which do not fall under the M-100 scope.

In addition to the parking lot of deleted milestones, we recommend providing a publicly available, comprehensive list mapping all the cleanup activities that will be negotiated under the M-100 milestone series and any bolded header categories that are being considered. For example, the Tentative Agreement includes, "Adaptive Milestone Process," "River Corridor Cleanup," and "Central Plateau Decision-Making." What categories will be added in the future? The list could increase transparency and communicate to the public, Tribal Nations, and Congress what cleanup activities are being negotiated and need funding.

- **Add a Milestone Requiring Public Comment & Review of the Adaptive Milestone Process:** After the agencies initiate discussions through M-100-01 and conclude the annual review of cleanup progress and planning scope outlook in M-100-02, require a 60-day public comment

period in which the TPA agencies solicit input on the proposed Adaptive Milestone Process. The milestone due date should occur annually.

- **Prioritize Meaningful Collaboration with the Public:** There are multiple opportunities in the future to inform and collaborate with the public on the new M-100 series. In addition to adding a new milestone requiring a 60-day public comment period soliciting input on the overarching Adaptive Milestone Process, please provide the public with an opportunity to review and comment on the new near- and long-term milestones created by the agencies. When new milestones are added or existing milestones are altered, provide an opportunity for public comment. Solicit public input early and often.

Take advantage of every opportunity available to engage and collaborate with the public and do not simply “check the box” with the bare minimum requirements under the Tri-Party Agreement. Hold an annual public meeting to share a summary of the proposed near-term M-100 milestone schedule, explain the rationale behind the timing of cleanup activities, inform the public on long-term milestone negotiations, and solicit public input on the schedule and path forward.

Ensure your public involvement efforts are guided by Hanford Advisory Board advice #239, part of which states:

The art and craft of public involvement is successful when: clear goals are defined; stakeholders contribute early to the design and development of public involvement; involvement is interactive, inclusive, engaging and respectful; the public has early input influencing the decision-making process (for example, the identification of alternatives for evaluation); the decision-makers demonstrate openness to having input influence their decisions and the decision-making process; and the public sees meaningful results from participation.

- **Milestones Missing from the Deletions in Change Control Form:** The Change Control Form provided in the [*Tentative Agreement on the Negotiation of Hanford Federal Facility Agreement and Consent Order Revisions for the M-015, M-016, and M-085 Milestones*](#) does not include two M-016 milestones.
 - M-016-87D is missing from the deleted M-016 milestones in the Change Control Form: "Submit an annual evaluation of results of enhanced groundwater monitoring near the 618-11 Burial Ground. If the evaluation indicates that interim actions are warranted to ensure protection of human health and the environment, DOE will recommend interim actions commensurate with the enhanced monitoring results. This milestone will continue on an annual basis and will be discontinued through joint EPA/DOE agreement via an approved change control form to delete this milestone."

- M-016-87-T03 is also missing from the deleted M-016 milestones in the Change Control Form: "Complete well implementation around 618-11, if needed to satisfy the DQOs."

Both milestones are listed in [Appendix D](#) of the Tri-Party Agreement, current as of 12/29/2025. For consistency, please update the Change Control Forms to include these two M-016 milestones for deletion.

- **Include the Tribes and State of Oregon in One-Year and Five-Year Meetings:** Use the Project Managers Meetings as a model and invite the Tribes and the State of Oregon to the M-100 milestone negotiation meetings that occur every year and every five years to foster transparency and openness. Do not allow these meetings to become a "black box" devoid of any information sharing or input like the Holistic Negotiations.
- **Address Systemic Problems:** A new milestone series is not going to fix entrenched systemic issues such as mismanagement, retaliatory safety culture problems, refusal to listen to dissenting voices, and a culture of denial. Until these issues are taken seriously and resolved, milestones will continue to be missed and delayed.
- **Build a Case for a Fully Funded Cleanup:** Use the 2025 Lifecycle Scope, Schedule, and Cost Report to convince Congress to increase funding for Hanford cleanup. The math is easy—more money above the current levels will contribute significantly to actual cleanup work, instead of only having enough funding to cover sitewide services.

USDOE can promote the new M-100 milestone series as a fix for the issues that cause milestones to be missed or delayed. The reality is that a different approach to tackling milestones is not going to fix Hanford's budget woes—one of the main reasons milestones are missed. Simply put, if you don't have the funding, you can't do the cleanup work. With Hanford's tank waste mission garnering more of the site-wide budget each year, it is crucial that USDOE advocates for a compliant budget that ensures all the legally binding milestones stay on track.

USDOE consistently portrays itself as operating within a fiscally constrained environment. In contrast, USDOE's 2025 Lifecycle, Scope, Schedule and Cost Report estimates a need for dramatically increased yearly spending in the coming decades to keep pace with Hanford cleanup. These estimates are at odds with USDOE talking points that prepare for cuts before they are made, instead of galvanizing the public and Congress around the need for increased funding. Hanford Challenge believes that there is work to be done within USDOE to reckon with the contradiction between USDOE's own written projections and verbal budget expectations so that they align in a common vision that can be leveraged for increased funding for Hanford cleanup.

It is imperative that USDOE use its Lifecycle Report to make a strong case to the Office of Management and Budget and to Congress for compliant funding. Milestones will continue to

be missed if USDOE doesn't advocate for more funding. By building a case for a fully funded cleanup and asking for the funding needed to maintain a compliant budget, Hanford cleanup can stay on track and protect human health and the environment without increasing the burden future generations must bear.

- **Ensure Cleanup Goals are Based on Tribal Future Land use and Tribal Exposure Scenarios:**
The Hanford Site encompasses a large area within culturally significant lands of the Confederated Tribes and Bands of the Yakama Nation, Confederated Tribes of the Umatilla Indian Reservation, Nez Perce Tribe, and the Wanapum people. In 1855, the Yakama Nation, Warm Springs, CTUIR, and Nez Perce, signed treaties ceding millions of acres of their lands to the United States, but reserved important rights, including Usual and Accustomed rights.

The Tri-Party Agreement agencies must ensure Hanford cleanup goals are based on Tribal future land use and Tribal exposure scenarios. The unique exposure pathways for Tribal members must be addressed in cleanup plans, and protectiveness must be demonstrated for a reasonable Tribal risk scenario. Efforts to remediate soil and groundwater must account for Tribal future land use and Tribal exposure scenarios. If cleanup efforts do not incorporate Tribal future land use and Tribal exposure scenarios, they become a grave environmental injustice.

We appreciate the opportunity to comment on the new M-100 milestone series and proposed approach to cleanup. Thank you for considering our comments.

Sincerely,

A handwritten signature in black ink, reading "Nikolas F. Peterson". The signature is written in a cursive, flowing style.

Nikolas Peterson, Executive Director, Hanford Challenge