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DEPARTMENT of
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and Resources
Program

CONFEDERATED TRIBES
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VIA FACSIMILE TRANSMISSION

August 8, 1995

Bob Stewart, DOE-RL
Department of Energy
Richland, WA 98055



Subject: COMMENTS ON THE AUGUST 16, 1995 CRCIA WORKSHOP

Dear Mr. Stewart:

Yesterday, Monday, August 7, 1995, I received your proposed agenda for the Columbia River Comprehensive Impact Assessment (CRCIA) Technical Peer Reviewers' workshop scheduled for August 16, 1995. I offer the following comments with the intent of making this workshop an effective forum to initiate the CRCIA analysis and to address the responsibilities of the CTUIR. Unfortunately, the current agenda marginalizes affected tribes and their views. This is hardly an auspicious way to begin the Tri-Parties' and the tribes' working relationship with the members of the Technical Peer Reviewers (TPR).

On July 27, 1995, CTUIR Special Sciences and Resources Program (SSRP) staff met with Linda McClain, DOE-RL, to discuss Tribal concerns about DOE inaction along the Columbia River. I would urge you to review the packet of information provided to her. In this packet note that SSRP staff have submitted voluminous comments on Columbia River issues. To date there has been little dialogue to resolve these fundamental concerns which are directly affected by the proposed agenda. I divide my comments into two broad categories: Process and Issues.

Process:

- 1) The TPR meeting should first focus on key process questions: What are the means to measure success? What are the groundrules for decision-making? What are the goals of the TPR? What are the scope of TPR responsibilities? What level of commitment and involvement is expected from TPR members? How will DOE/regulators respond to TPR requests?
- 2) In fulfilling its self-identified mission, what agency support will be provided? Will classified documents be accessible? Is contractor support for individual research projects identified?

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- 3) TPR members should describe their background, experience, perspectives, and expectations.
- 4) Last but not least, Who does the TPR report to??

These process questions alone comprise a full day's worth of facilitated discussion and still will not, however, address the other issues missing from the proposed agenda. The issues identified below, a non-inclusive list, are representative examples of missing items.

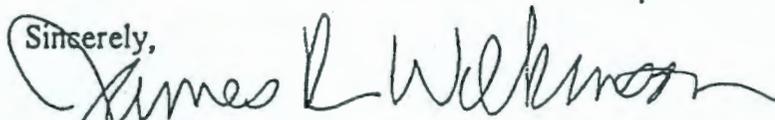
Issues:

- 1) Role and interests of Hanford-affected American Indian tribes.
- 2) Tribally identified threats to natural resources, culture, and health problems in tribal communities.
- 3) Hanford-affected tribes as partners with the regulators and the DOE in the CRCIA endeavor.
- 4) Tribes' roles as Natural Resource Trustees for Columbia River resources.

A "getting to know you" type of agenda, as outlined under "Process," would be more appropriate for the initial meeting which should focus on the process, history, and overall scope and purpose of the CRCIA and the TPR. The agenda proposed for the August 16, 1995, meeting would better serve as the agenda for the *second* (Issues) meeting. I realize that there are six working days before the August 16 meeting; nevertheless, CTUIR staff are not responsible for the fact that DOE and the regulators failed to inform us of this meeting or its potential content until yesterday.

Because we recognize the importance of these matters, we are making every attempt to address our concerns to you as quickly as allowed. I hope that the CTUIR, regulators and DOE can reform our working relationship so that these internal inefficiencies will be reduced and we can produce a credible Comprehensive Columbia River Impact Assessment. If you have any questions please contact me or Tom Gilmore, SSRP Hydrogeologist, at 503/ 276-0105.

Sincerely,



James (J. R.) Wilkinson
 Special Sciences and Resources Program Manager
 Department of Natural Resources
 Confederated Tribes of the Umatilla Indian Reservation

cc: Mary O'Brien, CTUIR/TPR consultant
 Russell Jim, Yakama Nation
 Donna Powaukee, Nez Perce Tribe
 Larry Gadbois, EPA
 Jerry Yokel, Ecology