

Energy Communities Alliance Input and Survey on EM’s Strategic Vision

“A Time of Transition and Transformation: EM Vision 2020-2030”

May 4, 2020

On March 9, 2020, the Department of Energy (DOE) Office of Environmental Management (EM) released its first strategic plan in several years titled “*A Time of Transition and Transformation: EM Vision 2020-2030*” (the “Strategic Vision”)ⁱ outlining the past accomplishments and plans for future progress within the EM programⁱⁱ. EM’s Strategic Vision provides a broad overview of the initiatives that EM plans to put into motion over the next decade, “laying the groundwork for a long-term plan to realize meaningful impact on the environmental cleanup mission.” Energy Communities Alliance (ECA) appreciates and supports the initiative to create a comprehensive vision for EM sites.

To help provide clarity on the local response to the Strategic Vision, ECA developed a survey to obtain feedback from local government representatives and community leaders. The questions asked the local officials about the EM Strategic Vision for their community, the positive aspects of the Strategic Vision, their involvement in the development of vision, and the viability of the vision under the Presidential Fiscal Year 2021 budget request.

It is also pertinent to note that DOE-EM released their Strategic Vision just prior to the COVID-19 crisis. With the spread of the virus nationally, there have been widespread operational and economic impacts across the nuclear complex. With the COVID-19 pandemic continuing to unfold presently, ECA members are extremely concerned about the potential for severe and significant impacts to the EM program. With circumstances constantly evolving within communities and at sites, it is more critical than ever for EM to focus and continue efforts to build and strengthen relationships with host communities.

Survey Overview

On a positive note, the majority of ECA members generally agreed with the overall vision at their sites and appreciated that EM is creating a strategic plan for the EM program. ECA has

always promoted EM having a clear annual and overall vision document and we appreciate that EM is moving in that direction. However, at the sites where EM deviated from the long agreed upon cleanup process, EM took a short cut and announced it in the Strategic Vision instead of speaking with the community. There is a lot of concern based on the conclusion in the Strategic Vision at those sites and the local government officials continue to wait for the briefing on the issues after the release of the Strategic Vision.

A large problem identified by all ECA members (and conveyed to EM the day of the release of the Strategic Vision) is that EM lacked an adequate outreach effort to ECA members including Mayors, County Executives, City and County Councilors, City and County Managers or other key local government officials about the Strategic Vision – especially lacking an effort at sites where there were changes to the long standing and agreed upon cleanup plans. Furthermore, the plan only generally identifies local governments (luckily in the field the large majority of EM site managers do work closely with local government officials). One response stated “There is reference to Stakeholder Engagement in the Strategic Vision. However, given the lack of input by stakeholders in the formulation of the document, it puts that priority into question.”

The Strategic Vision highlights that EM success came from shrinking the EM footprint 90 percent over the past 25 years – a lot of it included community conveyance of land and creating open space in communities. Past EM plans stressed, within footprint reduction, community collaborative processes such as land conveyance for economic development and other productive reuses supported by the community. This Strategic Vision included footprint reduction (priority #3) but did not include such community collaboration. This has created some concern but ECA has been told that EM is open to input and understands that EM can succeed in its mission through land transfers to shrink the EM footprint, decreasing EM cost to maintain the land and putting the land and personal property back into productive use.

The purpose of the survey was to address the communication levels, site priorities, and the relationships that exist between DOE-EM site and HQ officials and local communities. Below are the summarized results.

Survey Questions

1. Do you agree with the Strategic Vision for the site located in your community?
2. If yes, what are the areas of agreement? Any other comments? If no, what issues do you think are missing from the Strategic Vision?

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3. Are there any broader issues that should have been included in the Strategic Vision overall?
 4. Did DOE staff contact you about the development of the Strategic Vision for your site?
Did you meet or speak with HQ or site officials?
 5. Do you think this Strategic Vision is viable under the presidential FY21 budget request?
Why or why not?
 6. Is the role of local governments effectively covered in the Strategic Vision? Explain.

Summarized Survey Results

1. Do you agree with the Strategic Vision for the site located in your community? If yes, what are the areas of agreement? Any other comments? If no, what issues do you think are missing from the Strategic Vision?

ECA found the majority of respondents agreed with their site vision, those that disagreed outlined major concerns. Specifically, at Hanford and Portsmouth¹, communities were unsatisfied with the proposed course of action for their sites and each felt their community priorities were not reflected in EM's Strategic Vision. Comments from other sites noted a "lack of clarity" on issues including remediation, transportation schedule for TRU waste, and infrastructure revitalization as major deficiencies within the Strategic Vision. Further, none recognized issues outside the proverbial DOE fence even though key issues related to the site occur in the community and state including health and safety, labor-force issues and training, infrastructure, small business issues, economic development, and the transportation corridors between the sites.

2. Are there any broader issues that should have been included in the Strategic Vision overall?

Except for the items noted in #1 above, many of the respondents did not feel any broader issues were missing in the Strategic Vision. Some community leaders raised DOE site resilience issues including the concern of natural disasters, utility interconnectivity with the community and site safety. Other sites raised questions over being "de facto permanent storage location until a final nuclear waste repository moves forward." Safety and overall site operations in general should be included with a more detailed outlook.

¹ It is ECA's understanding that both Hanford and Portsmouth will be reaching out to EM independently.

3. Did DOE staff contact you about the development of the strategic vision for your site? Did you meet or speak with HQ or site officials?

The results illustrated a clear lack of initiative to contact sites for the development of the Strategic Vision as the **majority of respondents said they were not contacted**. Many of the communities also felt that DOE changed the cleanup priorities without local government input. To have a cohesive working relationship, there must be a mutual understanding between communities and DOE to treat one another as partners. Lack of communication erodes trust, complicates progress and stymies future potential at each site. The lack of communication was surprising to many since almost all sites have a direct working relationship with the site managers at the EM sites. ECA was also surprised that no one from headquarters reached out to ECA on the Strategic Vision prior to the release as headquarters also does a good job of communicating with ECA staff and ECA leadership.

4. Do you think this Strategic Vision is viable under the presidential FY21 budget request? Why or why not?

The overall majority did agree that the Strategic Vision is viable under the FY21 budget request. There were however two main concerns expressed across the sites: 1) this Vision was written to justify the funding proposed for EM in the President's budget, and 2) the budget changes yearly, so the Strategic Vision will change yearly, especially depending on the vision of each administration so it will be difficult to have a consistent outlook.

5. Is the role of local governments effectively covered in the Strategic Vision? Explain.

Of the communities who responded, all sites said no, it was not effectively covered.

As one ECA member explained, “there is reference to Stakeholder Engagement in the Strategic Vision. However, given the lack of input by stakeholders in the formulation of this document, it puts that priority into question.” ECA understands that the Strategic Vision put out by EM is a “living document” and that changes will be forthcoming; however, a lack of initiative taken by EM to contact sites even to create a baseline document is very concerning.

Conclusion

ECA's goal is to foster and encourage a strong working relationship between the DOE and local governments and their elected officials. These strong relationships include a necessary base of trust and communication to be fully operative and functional. All these components -- trust, communication, input, and support -- are pivotal towards the accomplishment of the shared goals of the interested parties. The communication pathways between DOE and local communities impacted specifically by DOE activities must remain open and effective.

In the past there have been times where communication and outreach has not gone smoothly. ECA's role and purpose is to foster collaboration between the DOE and local communities. ECA provided DOE in 2016 with a list of lessons learned deemed of primary importance that would enable DOE to face the challenges and obstacles within the realm of budgeting, cleanup, and defense missions. The overarching recommendation: **involve local governments in DOE decision-making**. Meaningful engagement needed to include working with communities and Congress to ensure adequate cleanup funding and engaging those communities that are most directly impacted by the Department's nuclear waste management and disposal policies. ECA always appreciates the opportunity to work in conjunction with EM. In the coming versions of the Strategic Vision, ECA looks forward to facilitating greater communication between local communities – those most directly impacted by DOE's activities and policies – and the Office of Environmental Management.

ⁱ <https://www.energy.gov/em/mission/annual-priorities-strategic-vision>

ⁱⁱ On May 1, 2019, the U.S. Government Accountability Office (GAO) released a [report](#) entitled “*Department of Energy: Environmental Liability Continues to Grow, and Significant Management Challenges Remain for Cleanup Efforts*.” In its findings, GAO concluded that DOE's Office of Environmental Management (EM) has “not resolved long-standing management challenges,” noting most significantly that EM does not have a program-wide cleanup strategy and relies primarily on individual sites to locally negotiate cleanup activities and establish priorities, which does not always balance overall risks and costs.” GAO recommended that DOE submit in EM's annually required Future-Years Defense Environmental Management Plan “all mandated requirements, as well as information on annual growth in environmental liability estimates by site, the key factors causing that growth, and an explanation of significant differences between environmental liability estimates and life-cycle cost estimates.” This recommendation was to address concerns that “DOE is not consistently and comprehensively submitting complete information about the status of its cleanup.” As the report explained, this has the potential to impact Congress and other stakeholders by failing to provide access to reliable information in order to make informed decisions. It was this recommendation that laid the basis for developing a strategic vision of cleanup activities and a projected timeline for each site. Ideally the vision would include: milestones to be met, whether milestones would be met, and if not, outlining the reasons and causes for missing milestones.