



June 19, 2018

Anne White, Assistant Secretary
Office of Environmental Management
U.S. Department of Energy
1000 Independence Ave. S.W.
Washington D.C. 20585

Dear Assistant Secretary White:

The National Governors Association (NGA) Federal Facilities Task Force (FFTF) and the Environmental Council of the States (ECOS) are writing to express interest in participating in policy conversations about the definition of high-level waste within the cleanup of the nuclear weapons complex. Members of our state organizations play critical roles, in coordination with the Department of Energy's (DOE) Office of Environmental Management (EM), in the national effort to clean up sites in states where nuclear materials were produced during the Cold War.

The FFTF, coordinated by NGA's Center for Best Practices, serves as a forum for continued dialogue among governor-appointed representatives from the states that host, or are directly impacted by, cleanup efforts. ECOS represents state environmental agency leaders, who are co-regulators of the cleanup efforts and who coordinate with DOE on regulations, budgets, cleanup strategies and protection of human health and the environment in their states.

Recently, attention to the definition of high-level waste at these sites has been renewed in response to the September 2017 publication of an Energy Communities Alliance (ECA) report titled, "Waste Disposition: A New Approach to DOE's Waste Management Must Be Pursued." The report encourages DOE and Congress to consider alternative paths to move waste disposition and cleanup forward, including a recommendation to accelerate cleanup by basing waste classification decisions on the characteristics of the waste and the risks to human health and the environment rather than on the origin of the waste.

We appreciate ECA bringing attention to the issue, and ECOS and FFTF members are generally supportive of making cleanup more efficient and effective. Because this important decision about how high-level waste is defined will have wider implications at certain sites, careful consideration of any policy changes would best be informed by the state entities who oversee and regulate the cleanup. States have voiced specific concerns in response to the report and are prepared to participate in and inform any dialogue that might be prompted by ECA's report.

We look forward to working with you to continue advancing the mission of DOE EM and protecting public health, safety and the environment.

Sincerely,

Scott Pattison, Executive Director and CEO
National Governors Association

Sam Sankar, Executive Director
Environmental Council of the States

Cc: Elizabeth Lisann, Senior Advisor, Office of Environmental Management, U.S. DOE
Seth Kirshenberg, Executive Director, Energy Communities Alliance