

Rocky Flats Coalition of Local Governments

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April 9, 2001

Ms. Barbara Mazurowski
U.S. Department of Energy
Rocky Flats Field Office
10808 Highway 93, Unit A
Golden, CO 80403

Mr. Doug Benevento
CDPHE
4300 Cherry Creek Dr. South
Denver, CO 80202

Mr. Jack McGraw
EPA
999 18 th Street, Suite 500
Denver, CO 80246

Dear Ms. Mazurowski, Mr. Benevento, and Mr. McGraw:

The Board of Directors of the Rocky Flats Coalition of Local Governments has reviewed the attached report, "Hand-in-Hand: Stewardship and Closure," developed by the Rocky Flats Stewardship Working Group. We are pleased to forward this report to the RFCA parties. It is our hope that the report will generate a robust dialogue about the interconnectedness of stewardship, remedy selection, and long-term protection of human health and the environment.

Stewardship is key to the Coalition as cleanup decisions will affect our communities long after Rocky Flats has been cleaned and closed. The cleanup will not eliminate all contamination and related risks, so long-term monitoring and maintenance will be necessary to protect human health and the environment. In an effort to help ensure the long-term protection of our communities and to address the relationship between stewardship and cleanup, the Coalition has been working collaboratively with the Rocky Flats Citizens Advisory Board (RFCAB) to direct the Stewardship Working Group.

The group's primary goal is to develop the information necessary to allow the community to effectively inform remedy selection. The attached report, the first issued by the Stewardship Working Group, emphasizes the importance of incorporating long-term monitoring and maintenance needs and obligations into the site remedy selection process. To this end, the group has proposed methods for analyzing stewardship requirements in the context of remedy selection, as well as steps the Department of Energy and other RFCA parties can take to improve site stewardship planning.

The report concludes that although the DOE is making efforts to plan for long-term stewardship, there is much more work to be done. The six recommendations, which the Coalition endorses, are geared towards better integrating a stewardship analysis into remedy selection. We believe these recommendations are sound and are consistent with the CERCLA provision mandating cleanup alternatives be assessed for their long-term effectiveness and permanence. One key question this provision raises is the appropriate level of long-term protection analysis that needs to be considered in RFCA decision documents. We believe that question demands increased public dialogue with the active participation of all RFCA parties.

Towards this end, the Coalition continues to posit that the RFCA parties must weigh the costs, both social and economic, of conducting additional source removal in order to both lessen the reliance on stewardship controls and the risk of failure of such controls. More specifically, the Coalition believes the RFCA parties must weigh the long-term costs associated with a given remedy versus the near-term costs of conducting additional cleanup.

One issue not specifically raised in the report but one of great concern to the Coalition involves the potential role of local governments post-closure. The Board remains concerned that Rocky Flats may be looking to the Coalition, either collectively or as individual governments, to fulfill certain undefined stewardship obligations after the site is cleaned and closed. The Coalition steadfastly opposes becoming stewards of Rocky Flats. These vital responsibilities must remain the federal government's obligations. Moreover, the federal government must continue to take all steps necessary to ensure adequate funding post-closure for all stewardship activities, which in large part include monitoring, oversight and surveillance, record keeping, and enforcement.

As the RFCA parties consider and discuss the report's findings and recommendations, we expect to increase our understanding of the key issues raised in the report. We hope you and your agency will incorporate the recommendations of this report into your cleanup, closure, and long-term stewardship plans. We likewise intend to continue our cooperative effort with the RFCAB in working with the site and regulators to ensure the long-term protection of human health and the environment.

Sincerely,

/s/

Paul Danish
Chairman