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*Lower Columbia Basin Audubon Society*

A CHAPTER OF THE NATIONAL AUDUBON SOCIETY  
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Dear Sirs:

COMMENTS ON THE DRAFT HANFORD REMEDIAL ACTION ENVIRONMENTAL IMPACT STATEMENT AND COMPREHENSIVE LAND USE PLAN, DOE/EIS-0222D

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The Lower Columbia Basin Audubon Society (LCBAS) appreciates this opportunity to share its opinion on the wise public use of the Hanford Site. LCBAS and its sister chapters in the Northwest are dedicated to furthering public awareness of, and appreciation for, birds and wildlife, and their enhancement and protection through preservation of habitat. The Hanford Site and the ecologically-connected Yakima Training Center are extremely important to the future of wildlife and biodiversity in the Northwest and represent natural resources of both regional and national significance. LCBAS wholeheartedly supports scientifically-based natural resource land-use planning and commends the U.S. Department of Energy, Richland Operations Office (RL), for beginning the process for the Hanford Site.

LCBAS feels, however, that the plan incorporated in the *Draft Hanford Remedial Action Environmental Impact Statement and Comprehensive Land Use Plan, DOE/EIS-0222D*, does not contain the necessary management commitments and has not been given adequate effort and public attention to effectively protect the natural resources of the Hanford Site.

LCBAS offers the following recommendations to RL for developing an effective comprehensive Hanford Site land-use plan.

1. Give proper importance to land-use planning by either re-scoping the HRA-EIS to include all aspects of land-use planning or preparing an EIS specific to land-use planning. Land-use planning for a site that is as significant as Hanford is a major action and, as such, must be done under a proper EIS. The current HRA-EIS draft does not present and analyze alternative land uses



and their potential environmental impacts, as required by the National Environmental Policy Act.

2. Incorporate all available information regarding biological resources (both flora and fauna) to properly assess the potential adverse impacts, including cumulative impacts of all planned development on the Hanford Site, of future RL actions. At a minimum, biological data that is available from the Priority Habitat and Species Program of the State Department of Fish and Wildlife, from recent studies by the Nature Conservancy and from the U. S. Department of Interior should be included as overlays for the land-use plan. Additional studies to provide detailed or missing data on the nature and condition of biological resources in the central core area should also be completed prior to proposing a preferred land-use alternative.
3. Protect the important biological connection between the Hanford Site and the Yakima Training Center by not developing the existing corridor south of Umtanum Ridge that includes the McGee Ranch and the proposed fine-soils borrow site. Large-scale surface disturbance caused by removing soils from this area can create a biological barrier and open up the natural vegetation to invasive weeds. Leaving this corridor open by seeking an alternate soil borrow site with less adverse ecological impact will continue to allow exchange of native species between the major bio-diversity resources of the Hanford Site and the Yakima Training Center.
4. Make protection of intact ecosystems on the Hanford Reach, the river corridor, and adjacent upland areas the highest priority in remediation decisions for these areas. Extensive excavation to remove contamination and other major disturbances in the name of remediation, such as the excavation of the river shoreline proposed by the HRA-EIS, will threaten the integrity of these sensitive resources.

For this shoreline and other important habitats, selection of remediation methodologies should be based on minimizing both ecological risk and habitat disturbance. If risks to human health are a concern in these areas, human health protection should be achieved through restricting uses and access, and not through extensive removal actions to achieve unrestricted use.

Cleanup levels should be just adequate for the use; millions of public tax dollars will be wasted in cleaning up to unnecessarily high levels for "unrestricted" human consumptive uses.

5. Complete revision of the *Hanford Strategic Plan* and publish the *Draft Biological Resources Management Plan* as essential elements of the land-use plan. These plans (and/or others) should define what RL would actually do during future projects to avoid adverse impact, mitigate damage and enhance existing degraded natural resources. The current HRA-EIS contains too much of the "trust me" element; it could be removed by completing and publishing the above documents before finalization of the land-use plan.

Define RL's natural resources management commitments to assure the public that RL will actually follow the Hanford Future Site Uses Working Groups' admonition to "do no harm during cleanup or with new development" and to acknowledge the value of natural and cultural resources. Past experience with projects such as the Environmental Restoration Disposal Facility demonstrates that RL has not been sufficiently committed to mitigating (through avoidance or compensation) for the adverse impact of large-scale land disturbance on its natural resources.

The designation of "Open Space Restricted" that is applied to a large portion of the Site does not define the management commitments that RL would apply to protect the natural resources from as-yet-undefined DOE missions. Instead, the designation sounds too much like RL is reserving much of the Site for future actions without defining how it will avoid or minimize future adverse impact.

6. Re-define the "potential economic development areas" based on an evaluation of the potential natural resource impact and its relationship to the type and extent of development. The HRA-EIS presents only the development "wish lists" of a few selected special interest groups as a planning basis. Instead, RL should conduct a proper examination of the actual need for, and suitability of, various types of development that might be considered. Any proposed development plan should have thorough public review.

RL should commit in the land-use plan to additional lower-level planning for specific land-use proposals in designated development areas. It is imperative that any and all development be carefully evaluated for its specific impacts on all natural resources, as well as for cumulative impacts with other existing and planned projects, particularly to priority species and habitats. Widespread piecemeal development has the very real potential of fragmenting vital habitat and greatly reducing or even destroying its value for wildlife.

RL has apparently written off all of the altered habitat area included in its proposed Potential Economic Development Area as being of no natural resource value. On the contrary, much of this area is important for biological contiguity and is capable of being restored to productive habitat. Any area, even though degraded by human mis-management or natural causes, that contains a predominance of native species or rare habitats and plant communities is important and must be evaluated in a natural resources protection plan.

Native vegetation in areas to be developed should be designated as sources of seeds or salvaged plants for transplanting and revegetating restoration sites. Some species (e.g., long-billed curlew) utilize disturbed habitat for nesting, cover, and foraging areas. Land use planning for these areas should incorporate resource values identified by natural resource agencies and The Nature Conservancy.

7. Delete the Port of Benton's "Proposed Economic Development Plan" and the "Wahluke 2000 Plan Map" or include other interest groups' plans. The Port of Benton and Wahluke plans, which encompass a large extent of significant natural areas, do not constitute critical economic planning and only prejudice the planning process by their inclusion in the HRA-EIS. LCBAS, as well as many other interest groups, would be pleased to present RL with their economic development plans based on wild fish stock production, eco-tourism, public education and quality of life enhancement and thus gain their own development spaces on the map.

Mssrs. Tom Ferns  
Paul Krupin

December 10, 1996

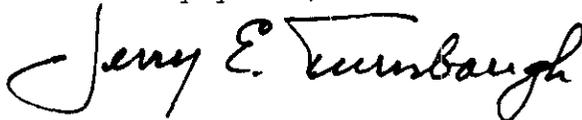
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Consideration of agricultural and residential scenarios is valuable in the risk assessment process but inclusion of specific agricultural and residential use proposals is totally inappropriate for the Hanford Site.

8. Include in the planning process the groundwater impact of the future tritium plume that is now being generated by disposal of the Tank Waste Remedial System waste in the 200 Area State Approved Land Disposal Site.

Thank you for this opportunity to participate in the very important process of land-use planning for the Hanford Site. Please call me at (509) 545-0671 if you need clarification of any of our recommendations.

Sincerely yours,



Jerry E. Turnbaugh  
President

cc:

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