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STATE OF WASHINGTON  
DEPARTMENT OF FISH AND WILDLIFE

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% Washington Department of Ecology  
1315 W 4<sup>th</sup> Ave.

20 July, 1999

James Zeisloft  
U.S. Department of Energy  
P.O. Box 550 MSIN: HO-12  
Richland, WA 99352



**RECEIVED**  
**JUL 22 1999**  
**DOE-RL / DIS**

Dear Mr. Zeisloft:

Subject: Comments on the proposed W-519 compensatory mitigation sites

The Washington Department of Fish and Wildlife (WDFW) appreciated the briefing on the W-519 Mitigation Project at the July meeting of the Hanford Natural Resource Trustee Council (Council), and appreciates the opportunity to provide input on identifying appropriate compensatory mitigation sites on the Arid Lands Ecology (ALE) Reserve.

The intent of implementing the full mitigation sequence, i.e. avoidance through compensation, is to achieve no net loss of habitat value or wildlife populations. The W-519 project is performing compensatory mitigation for the destruction of high value shrub steppe that contained an understory consisting of numerous native plants and barren soil with a cryptogamic crust. From our review of the handouts, we believe the proposed compensatory mitigation sites will be unable to achieve no net loss of habitat value or the mitigation objectives. This is due to the proposed sites being located in extremely low quality habitat, i.e. areas dominated by cheatgrass with little to no barren soil present. We believe the proposed sites offer less understory habitat value than the impacted area and therefore will be unable to support equivalent numbers of shrub steppe dependent species, such as, the loggerhead shrike or sage sparrow.

The selection process should attempt to identify areas with similar characteristics and equivalent understory habitat value. This can be achieved by including an understory habitat value criterion in the site selection process.

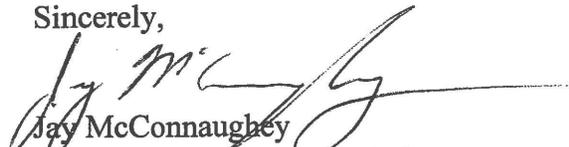
WDFW requests a meeting to discuss the issue and wishes to tour the ALE with appropriate U.S. Department of Energy staff and contractors. In addition, members of the Council's Biological Restoration Mitigation Committee should be invited as well as the U.S. Fish and Wildlife Service National Wildlife Refuge managers.

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Mr. Zeisloft  
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Page 2 of 2

Please contact me at 509/736-3095 to schedule a meeting/tour as soon as possible and to allow adequate time for the necessary cultural resource surveys to be completed before the fall planting season.

Sincerely,



Jay McConnaughey  
Habitat Biologist, Hanford Site

jlm

cc:

D. Ward, USDOE  
M. Sackschewsky, PNNL  
T. Clausing, WDFW