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December 11, 1996

John D. Wagoner, Manager
U. S. Department of Energy
Richland Operations Office
P. O. Box 550 MSIN 7-50
Richland, WA 99352



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DOE-RL/DCC

Re: Comment on Draft Hanford Remedial Action Environmental Impact Statement and Comprehensive Land Use Plan

Dear Mr. Wagoner:

The City of Richland appreciates this opportunity to comment on the Draft Hanford Remedial Action Environmental Impact Statement (HRA-EIS) and Comprehensive Land Use Plan. Please consider the following in preparation of the final draft.

Summary -- Notwithstanding concerns noted below, the future land uses reflected in the draft are generally consistent with the City's preferences. Richland's primary land use interests are focused on the southernmost portion of the Site. This encompasses not only that area that will be annexed to the City in the year 2000, but also the tract of State-owned land, the LIGO site, the WPPSS campus, the FFTF, and the 400, 300, 1100, and 3000 Areas. We agree with the HRA-EIS designation of this region as "Industrial and Commercial" and "Potential Economic Development Zone." However, we do not agree that the entire area be limited to "Restricted" uses within these categories.

Focus of the HRA-EIS -- The HRA-EIS is not intended to establish cleanup standards or direct the cleanup. Rather, its purpose is to consider future land uses and associated environmental impacts. Nevertheless, it seems the draft first determines cleanup levels acceptable to DOE-RL, then specifies public access options DOE-RL deems feasible, and finally attaches compatible land use designations. While the HRA-EIS end product is generally acceptable to the City, this upside-down approach to land use planning is not. Land use proposals developed by Benton County, the City of Richland, and other local governments are included with the report's existing conditions data, but not specifically identified and properly evaluated as alternatives. This is not consistent with the NEPA process.

Poor Aggregation -- In specifying distinct land use districts for evaluation, the draft HRA-EIS depends too heavily on work done four years ago by the Hanford Future Site Uses Working Group. This is especially problematic for the "All Other Areas" region. The



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entire area is unnecessarily designated "Restricted." Were this enormous 240-square mile area subdivided into smaller segments, some would be suitable for the "Unrestricted Land Use." Another confusing distinction is application of a "Cultural Resource" constraint over the entire Site. Surely this classification could be more selectively applied to areas of genuine cultural significance.

Socioeconomic Impacts -- The draft does not adequately address the community's need to diversify and strengthen the economy to offset the decline of Hanford employment. Related community goals are not incorporated into the HRA-EIS. Instead of examining the potential of various land uses to help achieve economic diversification, the draft simply summarizes socioeconomic impacts related to different cleanup actions. Neither does the HRA-EIS properly acknowledge Richland's historic role as part of Hanford and the continuing dominance the Site plays in the local economy. Richland is described simply as a "nearby population center."

Planning Process -- Involvement of local governments in development of the HRA-EIS was much more limited than we would have preferred. The City was disappointed that DOE-RL rejected the offer by local governments to work in a truly collaborative fashion through creation of an intergovernmental Hanford Planning Commission. We are also frustrated by DOE-RL's reluctance to plan in accordance with Washington's Growth Management Act (GMA). The local communities and all state agencies are planning under GMA. GMA prescribes a more comprehensive planning approach than employed in the HRA-EIS.

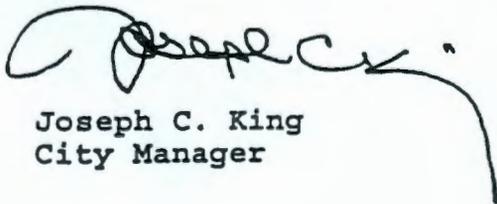
Planning Horizon -- The HRA-EIS appears limited in time to the duration of DOE-RL land ownership. There is insufficient attention given to the future roles of state and local governments after land is transferred to alternate ownership. For example, "institutional controls" are suggested as a means of ensuring environmental protection. Who will track and enforce them in the future? DOE-RL should not assume a willingness on the part of local governments that were only peripherally involved in the land use planning process to assume responsibility for enforcing institutional controls in the future.

Relationship to Other Plans -- The draft references several completed or independently progressing planning efforts that are not part of the HRA-EIS. The cumulative impact of these separate planning activities, as well as Tri-Party Agreement effects on future land uses, should be better reported in the HRA-EIS.

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Thank you for the opportunity to comment. We would welcome the chance to work with the Department of Energy Richland Operations (DOE-RL) in refining the draft HRA-EIS.

Sincerely,



Joseph C. King
City Manager

Copies: Richland City Council
Hanford Communities
TRIDEC
Thomas W. Ferns, NEPA Document Manager
Hanford Remedial Action Environmental Impact Statement
Paul J. Krupin, Project Manager
Comprehensive Land Use Plan
EPA, Region 10
Washington Department of Ecology