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John Wagoner, Manager
 U.S. Department of Energy
 Mail Stop A7-50
 P.O. Box 550
 Richland, WA 99352

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Dear Mr. Wagoner:

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 REQUEST FOR FUNDING AND COMPLETING THE BIODIVERSITY
 INVENTORY, ② BIOLOGICAL RESOURCE MANAGEMENT PLAN AND
 ③ BIOLOGICAL RESOURCE MITIGATION STRATEGY.

U.S. Department of Energy (USDOE) is steward of the largest contiguous block (560 square miles) of shrub steppe in Washington. During the last 50 years, a large portion of the Hanford Site has remained undisturbed and untouched under the stewardship of USDOE and its predecessors. During the same period, a large portion of shrub steppe in the Columbia Basin of central Washington has experienced detrimental impacts. The National Biological Service has listed native shrub and grassland steppe in Washington and Oregon as an endangered ecosystem. The decline has been attributed to destruction, conversion to other land uses or to significant degradation of ecological structure, function or composition since European settlement.

Secretary of Energy, Hazel O Leary's, Land and Facility Use Policy states that "It is USDOE policy to manage all its land and facilities as valuable national resources". She defines national resources to include ecological resources and also states in the attached book *DEPARTMENT OF ENERGY-STEWARDS OF A NATIONAL RESOURCE* that "the USDOE will sustain the natural systems for which we are stewards".

For USDOE to make wise land use decisions, it must complete the Biodiversity Inventory, a baseline inventory of the Site. To date, The Nature Conservancy (TNC) scientists have discovered 2 plant and 7 insect species new to science. TNC's efforts concentrated on the Arid Land Ecology Reserve and North Slope. The Natural Resource Trustees have determined the discoveries to be significant and requests USDOE to complete the Biodiversity Inventory on Central Hanford. The Biodiversity Inventory is tiered to the

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 Plans

Biological Resource Management Plan and Biological Resource Mitigation Strategy and is an essential building block to all planning, including the Comprehensive Land Use Plan which is currently being developed under the Hanford Remedial Action Environmental Impact Statement. We recognize that the Comprehensive Land Use Planning effort is moving forward without a completed Inventory of the Site. However, the Inventory should be completed and the findings incorporated into the plan as soon as possible to allow appropriate protection of any identified sensitive species or rare plant communities on Central Hanford. It was unfortunate that USDOE cut the funding on the Inventory after the first year of a three year project. We would question any land use decisions on Central Hanford without a completed Inventory given the significance of the findings by The Nature Conservancy.

A letter from James Rasmussen to the Natural Resource Trustees, dated 22 May 1995, stated that the Biological Resource Management Plan and Biological Resource Mitigation Strategy would be developed in FY95. At this time, the two documents are in draft without funding to allow finalization and implementation.

The completion and implementation of the Biological Resource Management Plan and Biological Resource Mitigation Strategy, which address the ecological resources Site-wide, will save USDOE money, standardize procedures, allow proper siting of new facilities in areas with less habitat value thus reducing mitigation costs. Currently, individual projects such as the Cross Site Transfer System and Central Waste Complex are developing individual Mitigation Action Plans. Other projects such as the Environmental Restoration Disposal Facility, and 240 Access Road are awaiting the completion of the Biological Resource Mitigation Strategy before performing additional mitigation. Meanwhile, injuries to natural resources for these projects accrue increasing mitigation costs.

All three projects must be funded and implemented for USDOE to: make wise land use decisions; sustain a natural system, and be a responsible steward of the natural resources for the ultimate landowners, the citizens of the United States. The total proposed budget approved by the U.S. House and Senate Conference Committee was 1.29 billion dollars for the Hanford Site. The cost of funding these three projects would be negligible. How does USDOE Richland Office intend to fulfill the Secretary of Energy's Policy regarding ecological resources without having a Biodiversity Inventory completed, Biological Resource Management Plan and Biological Resource Mitigation Strategy completed and implemented? The Natural Resource Trustees request that all 3 projects be completed by the end of 1996, if not sooner for the two biological resource documents. Furthermore, we would request the Biological Resource Management Plan and Biological Resource Mitigation Strategy be implemented after finalization and funded annually, thereafter.

The Natural Resource Trustees strongly concur with James Rasmussen's statement made in the 22 May, 1995 letter to the Natural Resource Trustees "that the development and implementation of the aforementioned biological resource documents (referring to the Biological Resource Management Plan and Biological Resource Mitigation Strategy) will

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"New
tool"



significantly enhance RL's capability to give appropriate consideration and protection to sensitive ecosystems such as the shrub steppe habitat".

cc: Paul Kruger
Jamie Zeisloft