

**DRAFT ADVICE - REVISED DRAFT HRA-EIS/CLUP
FROM ENVIRONMENTAL RESTORATION COMMITTEE
FOR CONSIDERATION BY
HANFORD ADVISORY BOARD
Rev. 3**

ABSTAIN
Gerald P
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Betty Knight
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BACKGROUND

A draft Hanford Remedial Action Environmental Impact Statement (HRA-EIS) and Comprehensive Land Use Plan (CLUP) was issued in September 1996. Extensive and generally critical public comments were made during the review period. The Hanford Advisory Board did not submit formal advice, but agreed that this initial draft needed extensive revisions.

ADVICE

The Hanford Advisory Board is pleased that the U.S. Department of Energy (DOE) and the co-operating agencies and tribes have produced a thoughtful and comprehensive study of potential land uses for the Hanford Site which fairly considers its many important values and resources. We appreciate DOE's responsiveness to comments on the initial draft.

The Hanford Advisory Board has not attempted to reach consensus on the alternatives considered in the HRA-EIS/CLUP, in recognition of the diversity of opinion on this subject among Board members. The Board also has not had sufficient time to fully develop comments on the Environmental Consequences and Plan Implementation sections. However, we submit the following initial advice in the event that the public comment period is not extended:

1. The Board supports the proposed name change of the document to "Hanford Comprehensive Land Use Plan."
2. The Board supports DOE's removal of remedial actions from the scope of the EIS.
3. The Comprehensive Land Use Plan should be based on the Cultural Resources Management Plan, the Hanford Site Biological Resources Management Plan, and the Hanford Site Biological Resources Implementation Strategy. These plans provide guidance and direction in accordance with DOE Orders.
4. The Conservation/Mining area designation must be implemented so as to protect areas of high quality habitat of various types, particularly the high quality shrub-steppe sagebrush. ~~Mining should be limited to what is necessary to support remediation.~~
5. Areas where the river or creeks have historically flowed at Hanford are likely to have tribal use areas. Uses or activities which would physically disturb or potentially contaminate such areas should require detailed tribal review and field study for cultural sites prior to new development.
6. The policies and processes discussed in Section 6.0 of the document are crucial to successful implementation. The stated policy accomplishments are well-taken. We offer an additional principle that should have the weight of policy and should be added to Section 6.0:
 Maximize the excess value of the benefits over the costs of Hanford land use actions. The valuation of benefits and costs should be comprehensive, and reflect the collective wisdom, as shown in law, culture, and common practice.

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FROM ENVIRONMENTAL RESTORATION COMMITTEE
FOR CONSIDERATION BY
HARFORD ADVISORY BOARD

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BACKGROUND

The Harford Advisory Board was established in 1974 to provide advice and recommendations to the U.S. Department of the Interior regarding the management of the Harford National Wildlife Refuge. The Board's first meeting was held on September 19, 1974. The Board has since held several other meetings and has issued several reports. The Board's most recent report, dated June 1978, recommended that the refuge be managed as a multiple-use area.

SUMMARY

Reason for abstaining
This ~~is~~ advice could potentially
nullify treaty rights.

The Board has reviewed the proposed management plan for the Harford National Wildlife Refuge and has concluded that the plan is not in the best interests of the refuge.

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