

Lower  
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**Lower Columbia Basin Audubon Society**

A CHAPTER OF THE NATIONAL AUDUBON SOCIETY

P.O. Box 1900

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(509) 545-6115

June 2, 1999

Mr. Thomas Ferns  
U.S. Department of Energy  
Richland Operations Office  
P.O. Box 550, MSIN HQ-12  
Richland, Washington 99352

**RECEIVED**  
JUN 11 1999  
DOE-RL/DIS

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

Dear Mr. Ferns:

The Lower Columbia Basin Audubon Society would like to take this opportunity to comment on DOE's Draft Hanford Remedial Action Environmental Impact Statement and Comprehensive Land-Use Plan.

We commend the Department of Energy for the excellent research and enormous staff work utilized in preparing the EIS. The draft presents a broad spectrum of alternatives and supporting data. The department has done a good job of reaching out to the community for review and comments.

We support and congratulate the Department of Energy for the protection the preferred alternative provides for the Wahluke Slope, McGee Ranch, the Fitzner/ Eberhardt Arid Lands Ecology Reserve (ALE), Gable Mountain, Gable Butte and the Hanford Dune Field. The Hanford Reservation contains some of the best fish and wildlife habitat and native plant communities in the state of Washington. As an appendix to our comments we have included a large binder of endorsements supporting National Wildlife Refuge status for the Wahluke Slope and Wild & Scenic River designation for the Reach. We request the 922 endorsements be

EDUCATION

CONSERVATION

APPRECIATION

Recipient of the Chevron Times Mirror Award, 1996

included in the responsive summary for the HRA-EIS in support of a Wild & Scenic Reach and Wildlife Refuge for the Wahluke Slope.

Unfortunately the areas designated as "preservation" in the Preferred Alternative only begin to protect Hanford's natural resource treasures. We recommend extending "preservation" status to a much larger portion of the reservation as depicted on our attached map which is a combination of the Preferred Alternative and Alternatives One and Two. These additional "preservation" areas were selected to protect and connect the Washington Department of Fish and Wildlife's Priority Species locations displayed on Figure 4-17 and Levels II, III and IV Biological Resources displayed in Figure 4-27. These additional Preservation areas will allow the incredible wildlife habitat of Hanford to function as a shrub-steppe ecosystem. We are particularly concerned that the Riverlands area be designated "preservation" as it forms the linchpin connecting the Wahluke Slope, ALE Reserve and Hanford Reach. We applaud the designation of the islands of the Hanford Reach as "preservation." We highly recommend that management of the islands, the entire Wahluke Slope, Riverlands, McGee Ranch, and ALE all be incorporated into the U.S. Fish & Wildlife Service's Saddle Mountain National Wildlife Refuge.

Land-use designations within the HRA-EIS should be based on the most recent and best data available. The Department of Energy should include the biological data from The Nature Conservancy's 1997 biodiversity survey to help make land-use decisions in Central Hanford. All areas identified as containing native plant communities qualifying as element occurrences and areas identified as Special Habitat Areas (Figures 3 and 5 in the 1997 Annual Biodiversity Report) should be designated Preservation areas. These areas are in addition to any areas already designated within DOE's Preferred Alternative for Central Hanford.

We recommend narrowing the 200 Industrial (exclusive) area to reflect the same area designated in Alternative 1. This allows for protection of Washington Department of Fish & Wildlife Priority Species located along the western edge of the 200 area.

We recommend limiting the Research and Development to the FFTF and 300 areas. We believe the LIGO "V" should be designated "preservation" and managed as an existing non-conforming use within the preservation area.

We recommend limiting Industrial land use to the Energy Northwest area as shown on Alternative 2 and the City of Richland Urban Growth Area (minus the 300 area which we recommend as Research and Development) shown on Figure 1-6. Although the total land area set aside for industrial development appears small, it reflects the area the City of Richland views as necessary for development over the next fifty years. The industrial area includes the lands most suitable for development and contains the necessary utilities and transportation network to support development.

We support the recreational land-use designations in Alternative One with a few changes. We recommend limiting High Intensity Recreational use to the B-Reactor museum area, not including the shoreline as part of the High Intensity Recreational area, and allow access to the museum by existing paved roads only. All other recreational areas should be designated Low Intensity. Access to the White Bluffs landing on the Benton County side of the river should be limited to life-threatening emergency use only, as this is a bald eagle nesting area. We believe High Intensity recreational use constitutes a loophole, which would allow development of destination resorts, golf courses and other developments detrimental to Hanford's fragile wildlife habitat. We also recommend keeping the Vernita Bridge recreational area to the west side of Highway 240.

We are opposed to any grazing on the Hanford Reservation. Grazing does not control noxious weeds; it in fact spreads these weeds and destroys native grasses. The draft EIS mentioned using grazing to prevent range fires. We recommend introducing carefully managed burns to prevent the build-up of fuels and to replicate fires' natural role in Hanford's environment. We also believe allowing commercial grazing on Hanford could expose the Washington beef industry to consumer rejection of its product due to fear of nuclear contamination.

Mining is very destructive to wildlife habitat and should be restricted to only that essential to completing clean-up and remediation. All mining should be subject to NEPA analysis and review. All mining areas should be restored to natural habitat when closed. We are concerned about possible mining along Highway 240 in the ALE. We recommend using the ALE quarry site as a last resort only. The ALE is among Hanford best wildlife habitat and prime viewshed for the community, and should remain undisturbed.

The Site Planning Board's membership is too narrow and should be expanded. We recommend including representatives of the Washington Department of Ecology, Washington Department of Fish and Wildlife, National Marine Fisheries Service, as well as a representative of the local business community and the environmental community. The Hanford Reservation only includes approximately 330 acres of Adams County. We do not feel Adams County should be a permanent member of this board, except, of course being allowed representation on all matters pertaining to its 330 acres.

We support establishing a trail system for the enjoyment of Hanford's outdoor recreation opportunities. We do believe all trails should be carefully located to avoid sensitive wildlife habitat and native plant communities of concern. The trails should be managed for nonmotorized use.

Section 6.3.1 discusses Overall Policy for Comprehensive Land-Use Plan (CLUP). We recommend adding this policy statement: "Protect, preserve and enhance the native plant communities, aquatic and wetland ecosystems, and viable populations

of native fish, wildlife, and plant species." We further recommend listing this statement as the number two policy statement in this paragraph.

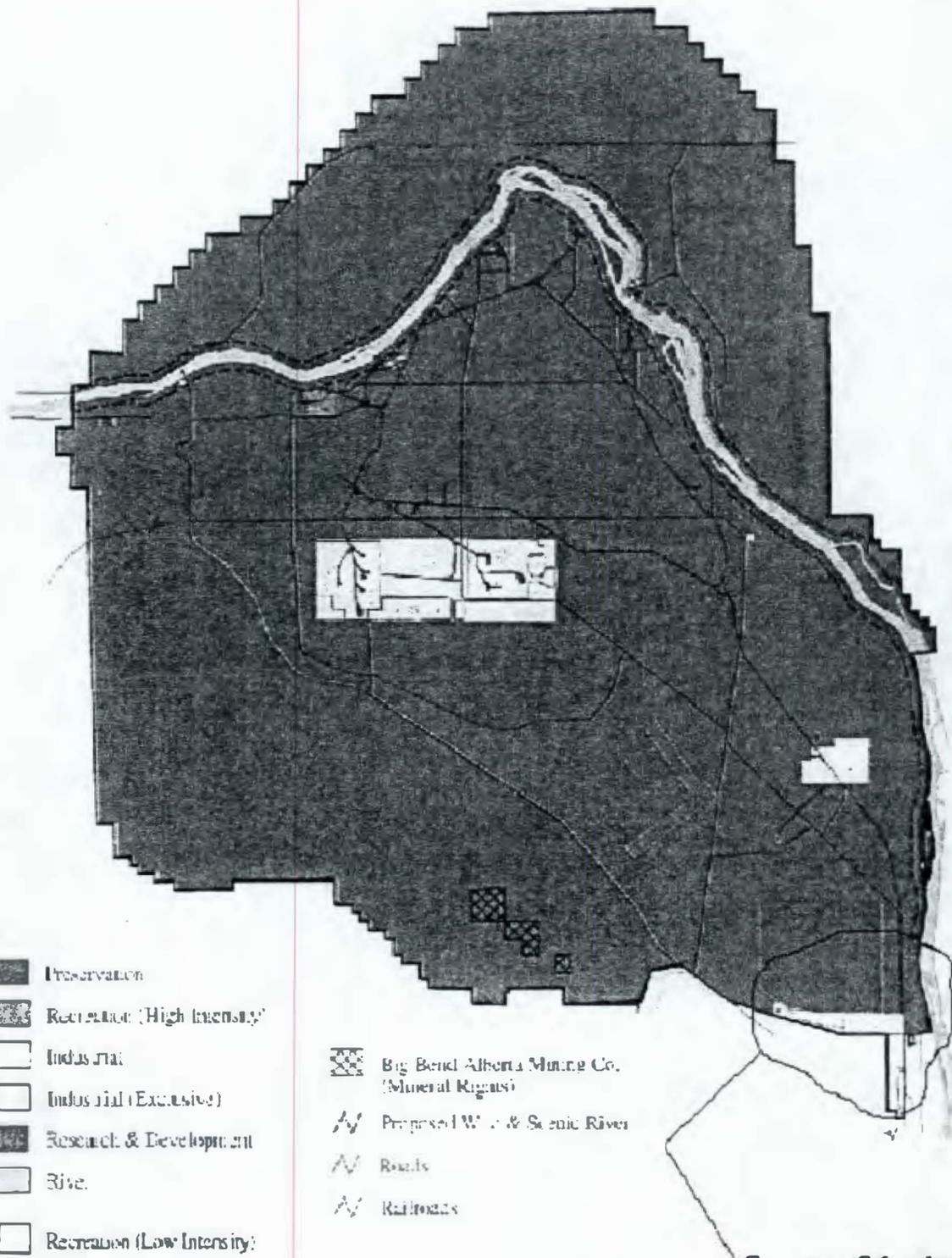
The issues discussed in the draft EIS for the central Hanford area are extremely complex and could take years to resolve. The issues involving the Wahluke Slope, ALE, Riverlands, McGee Ranch and the Hanford Reach are simple and decisions can be made now. We therefore request that the Secretary of Energy issue a separate Record of Decision no later than December 31, 1999.

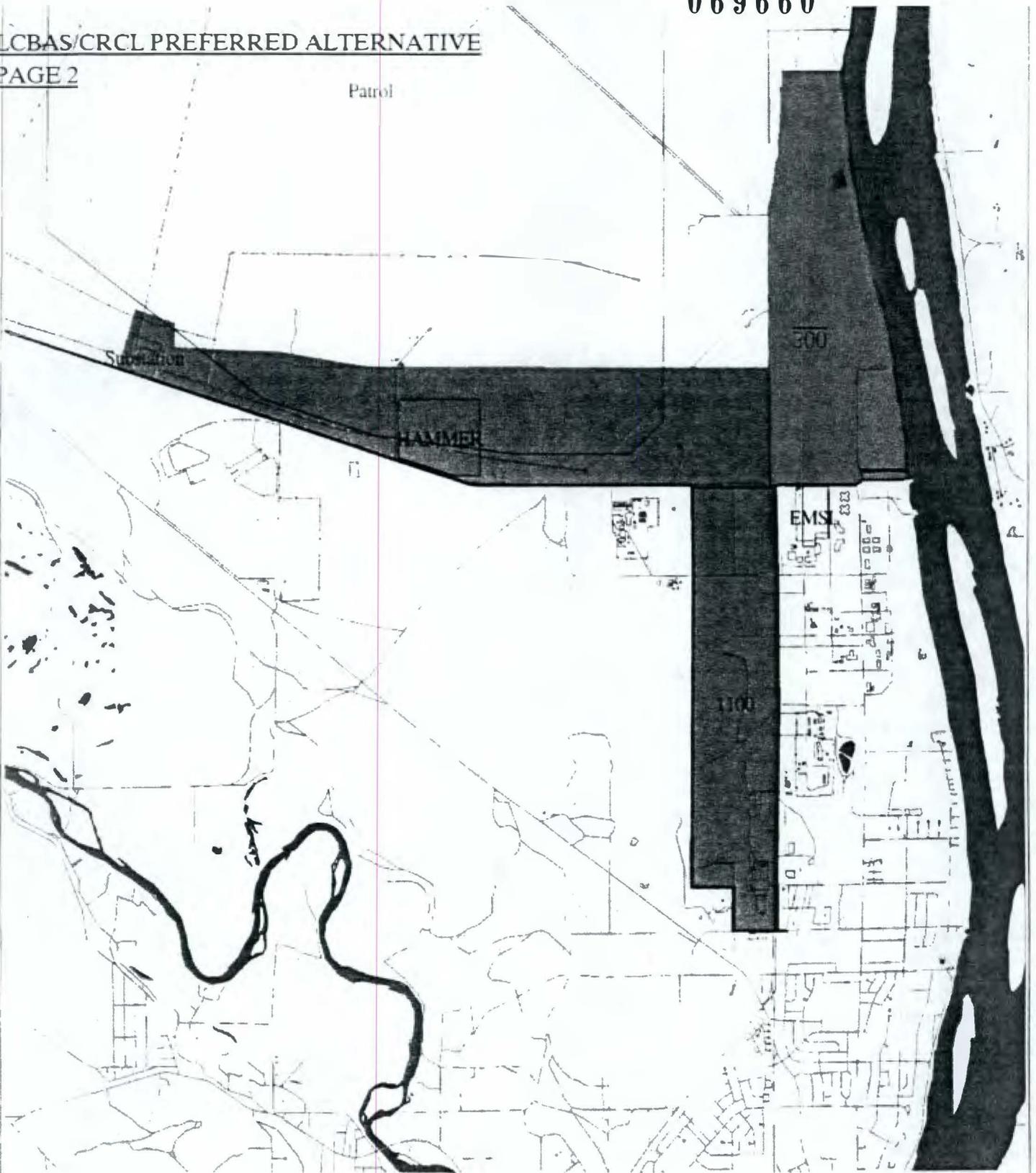
Thank you for this opportunity to comment on these important matters.

Sincerely,



Rick Leumont, Conservation Chair





-  City of Richland Urban Growth Area
-  Research & Development
-  Preservation

