

[119] From: Paul S Kube at ~DOE13 5/16/95 2:45PM (4550 bytes: 1 ln)  
 To: Linda C Goodey at ~MTC4, Jay L McConnaughey at ~TPA1, L E (Larry) Gadbois at  
 ~TPA1, Geoff Tallent at Ecology Lacey  
 Subject: Summary of ERDF MAP Comments

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Paul

Below is the overview you requested of major concerns with the Draft ERDF MAP. It should be used in association with the more detailed specific comments we provided earlier. As a convenience, and where possible, I have tried to indicate what specific comments apply to the summary comments below.

John

1. The MAP does not address all significant impacts to habitat.

The MAP does not address all project activities that have or will result in habitat loss or degradation; for example, the MAP does not address characterization sites e.g., borehole pads), the proposed ERDF rail-line route that was impacted by the rad-rover, and utility corridors (e.g., water lines) that will be necessary to support project operations.

Specific Comments: 9, 10, 13, 15, & 24

2. The MAP should concentrate more directly on addressing specific actions taken to mitigate for the proposed action.

Many of the mitigation measures committed to consist of non-mitigation driven changes to the proposed action rather than actual mitigation. The impact on wildlife and habitat remains extensive, yet there is no commitment to mitigate those impacts; there is only the commitment to consider planning.

Specific Comments: 14

3. The MAP does not identify the goals for mitigation, nor does it include all the relevant criteria necessary for fairly evaluating the appropriateness of additional mitigation measures.

The proposed criteria for evaluating additional mitigation measures do not address the impacts identified in the MAP. The criteria are obviously biased against the need to take additional mitigation measures. The first and foremost criterion for evaluating the need for additional mitigation measures is whether previously taken measures have adequately addressed the impacts to ERDF's natural resources.

Specific Comments: 16 & 22

4. The proposed additional mitigation options are inadequate.

Many of the proposed additional mitigation options are either inappropriately portrayed as mitigation, incompletely described, or technically wrong. Moreover, additional "options" that should be included are conspicuously omitted, such as acquisition or protection of habitat (this was even stated in the ROD).

Specific Comments: 17, 18, 19, 20, 21, 22, & 23

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5. The MAP ignores the temporal loss of habitat in defining the mitigation strategy for the ERDF.

Even if revegetation of the ERDF surface barrier was successful and full ecological function was restored, such a mitigation measure does not mitigate for the immediate loss of habitat value and its continued loss through time.

Specific Comments: 7 & 16

6. The MAP is inconsistent with BHI-EE-02, Environmental Requirements.

The MAP does not follow the mitigation guidance provided in BHI-EE-02.

Specific Comments: 7 & 22

7. Borrow site impacts are not adequately addresses.

The potential impact to borrow sites is inappropriately characterized as minimal. Possible measures for reducing impacts to borrow sites should be discussed.

Specific Comments: 8 & 15

8. The requirements for the surface cover to function as a waste barrier may conflict with the cover's ability to restore full ecological function.

This particular impact was not directly addressed in our comments because the MAP itself did not imply there could be a problem. The MAP discusses revegetation of the surface barrier yet it provides no information as to whether the constraints imposed on the design of the surface cover to function as a waste barrier will preclude the ability of the revegetated cover to restore the loss of habitat value that was present prior to the impact. For example, the ROD states that the upper 50 cm (20 in) of the soil cover system is designed to enhance the resistance of the cover to burrowing animals. This implies that this resource value will not be restored at the ERDF site. Thus, even if the temporal losses of habitat value are ignored, the revegetated ERDF site may not ever adequately restore the lost resources at the site.

Related Specific Comments: 5, 6, 7, 11, & 21