



Oregon

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Mr. Thomas W. Ferns
DOE Document Manager for the HRA-EIS
U.S. Department of Energy
Richland Operations Office
PO Box 550, MSIN HO-12
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DOE-RL / DIS

Subject: Oregon Office of Energy's Comments on the Revised Draft Hanford Remedial Action Environmental Impact Statement and Comprehensive Land Use Plan (HRA-EIS).

Dear Mr. Ferns,

Thank you for the opportunity to comment on the HRA-EIS. The Department of Energy (DOE), the Tribes and Cooperating Agencies did a good job in preparing a thoughtful study of potential land use considerations for the Hanford site. The document fairly considers the many important values on the site.

With respect to future uses of the Hanford Site, the Oregon Office of Energy (OOE) holds these values:

1. The Columbia River must be protected from further contamination and degradation.
2. The health and safety of the citizens of Oregon must be protected.
3. The treaty obligations of the U. S. Government with respect to the Tribal Governments must be recognized and satisfied.
4. The important ecological, biological, geologic, historic and cultural assets of the Hanford Site must be preserved.
5. Plan so as to protect the ability to cleanup the site and avoid the potential for conflicts between cleanup and listing of species as rare, threatened or endangered. This means ensuring the planning for the protection of the Shrub-Steppe and other special habitats in advance to avoid creating future conflicts.

The OOE finds that all the alternatives with the exceptions of Alternative Three and the No Action Alternative satisfy these values. Alternative Three is unsatisfactory for the following reasons:



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1. This Alternative does not adequately protect cultural resources. For example, more extensive development would be allowed within viewsheds on site than for any of the other alternatives, and damage could occur to cultural sites on the Wahluke Slope from agriculture. Increased irrigation on the Wahluke Slope could cause loss of the White Bluffs. Alternative Three sets aside a total of 12,022 acres for both high-intensity and low-intensity recreation. This is at least 11 times the amount set aside for any other alternative.
2. Alternative Three does not adequately protect critical habitats. Irrigation of the Wahluke Slope could significantly increase siltation in the Columbia River causing loss of spawning habitat. The amount of land that could be cleared for agriculture is greater in this alternative than any of the others.
3. The Columbia River is not adequately protected from further damage. Allowing agriculture and irrigation on the Wahluke Slope could result in greater amounts of agricultural chemicals entering the River, and increased siltation of the River, well beyond that of other alternatives.
4. In addition to the above, Alternative three does not adequately incorporate Hanford Advisory Board (HAB) values. In particular, the HAB has stated that historic and cultural resources have value and should not be degraded or destroyed. While this alternative clearly does not directly advocate the degradation or destruction of these resources, by allowing such extensive development, we feel it is not adequately protective of these resources either.

The No Action Alternative is unsatisfactory since it is a basically a decision not to decide in advance on a land use strategy. Future land uses will be decided in a piecemeal fashion. For this reason, we can't be sure that these future uses of the Hanford Site will adequately address our values as described above.

Further specific comments are included in the attachment to this letter. Should you have any questions concerning these comments, please contact Mr. Douglas Huston of my staff at (503) 378-4456.

Sincerely,



Mary Lou Blazek
Administrator,
Nuclear Safety Division
Oregon Office of Energy

Oregon Office of Energy's detailed comments on the Revised Draft Hanford Remedial Action Environmental Impact Statement and Comprehensive Land Use Plan (HRA-EIS).

1. None of the alternatives discusses the types of long term institutional controls that could be required. These could represent a significant expense. We recommend that the HRA-EIS include an analysis for each alternative's institutional controls. Institutional control is highly dubious beyond 100 years.
2. Although this document is deliberately focused away from remediation decisions, we recommend there be some discussion of how the land use criteria of this document may be used to influence remediation decisions.
3. In many cases the statement in Table 3-4 that Alternative 3 impacts are the same as the preferred alternative's impacts is misleading – they are similar in kind but an order of magnitude more severe. For example, the preferred alternative sets aside a total of 1,028 acres for recreation. Alternative Three sets aside a total of 12,022 acres for recreation, yet the statement of impact for water resources in Table 3-4 says "Same as the Preferred Alternative" when referring to Alternative 3. We recommend that a clearer statement of the differing magnitudes of impact be included in Table 3-4.
4. Chapter 6 contains little detail on the functioning of the Site Planning Advisory Board (SPAG). Without further details on the functioning of the SPAG, we are concerned that membership appears to be heavily weighted toward the local communities. We urge DOE to be certain that the operations of the SPAG are set up so as to provide balanced reviews and recommendations on land use and resource management issues. For example, this panel could be restructured to provide each of the tribes, agencies, counties and cities the opportunity to comment only on those proposals directly involving land affecting their interests. Broader input and comment would need to occur through an open public process.
5. Areas where rivers or creeks have historically flowed at Hanford are more likely to have been tribal use areas in the past. We recommend that the Comprehensive Land Use Plan (CLUP) include, as a requirement, a detailed tribal review and field study for tribal cultural sites for any industrial use designated area(s) prior to implementing any plan for using such areas.
6. We recommend the CLUP be integrated with the Cultural and Tribal Resources Plans and recognize the Hanford Site Biological Resources Management Plan and the Hanford Site Biological Resources Implementation Strategy as providing governing guidance and direction in accordance with DOE Orders P 430.1 (Land and Facility Use Policy) and O 430.1 (Life Cycle Asset Management).