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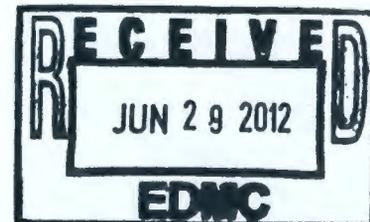
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(non-voting)

May 22, 2012

Matthew McCormick, Manager
U.S. Department of Energy
Richland Operations Office
P.O. Box 550, MS A7-50
Richland, WA 99352



Dear Mr. McCormick,

The purpose of this letter is to express the Hanford Natural Resource Trustee Council (HNRTC) support for funding to implement the Department of Energy (DOE) document, *Integrated Vegetation Management on the Hanford Site, Richland, Washington* (DOE/EA-1728-F).

The Council has a fiduciary responsibility to assess potential injury to natural resources at Hanford, and to restore those resources and lost services to baseline conditions. "Baseline" conditions are those that would have existed "were it not for the release of hazardous substances." Our goal in restoration at Hanford is to achieve a sustainable and fully functioning ecosystem to the greatest extent possible. The HNRTC has three broad goals previously transmitted to you:

1. Achieve a cleanup of the site sufficient to avoid or minimize residual injury to natural resources and the services they provide.
2. Have a cost-effective remediation of the site through coordination with NRDA restoration.
3. Post-cleanup land use decisions that do not constrain or preclude effective NRDA restoration.

Habitat that is not restored to pre-release conditions and sustained can significantly add to the amount of restoration costs required for the Natural Resource Damage Assessment.

The spread of noxious weeds can significantly compromise our efforts at restoration. Some plants, e.g., cheatgrass, not only displace native vegetation, but can fuel intense fires that destroy habitat. We believe that alien weed control at Hanford should be designated as a high priority. Yet we understand aerial spraying has not occurred for the past two years and

the spread of noxious vegetation, particularly rush skeletonweed, is fast becoming unmanageable.

The following regulation is noted in the Hanford Site Biological Resource Management Plan (DOE-RL 96-32):

"The Federal Noxious Weed Act of 1974, as amended by Section 15 - Management of Undesirable Plants on Federal Lands, 1990, authorizes the Secretary of Agriculture "to cooperate with other federal and state agencies in carrying out operations or measures to eradicate, suppress, control, prevent, or retard the spread of any noxious weed. Each federal agency must:

- 1) Develop and coordinate an undesirable plants management program on federal lands under the agency's jurisdiction,
- 2) Establish and adequately fund an undesirable plants management program,
- 3) Complete and implement cooperative agreements with State agencies, and,
- 4) Establish integrated management systems to control or contain undesirable plant species targeted under cooperative agreements."

Representatives from several trustees attended the Vegetation Management EA meeting in late February with DOE officials who have responsibility for overseeing the control of noxious weeds at Hanford. We were informed that funding may be inadequate to 1) control weeds, and 2) conduct the requisite biological and cultural surveys prior to spraying. We were informed there is no funding available to conduct the surveys, which means control cannot be implemented.

We ask that DOE develop a sense of urgency at Hanford to maintain an ongoing program with the necessary funding to meet both the letter and the spirit of the weed control regulations. We as Trustees are eager to meet with DOE officials to work on long-term solutions to help protect these vital habitats.

Thank you.

Sincerely,



Jack Bell, Chairman
HNRTC

Cc: Steve Stites, DOE
Woody Russell, DOE
Richard Roos, MSA
Jill Conrad, DOE
Dennis Faulk, EPA
Jane Hedges, Ecology
Charlie Stenwall, USFWS