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United States Department of the Interior

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OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
500 NE Multnomah Street, Suite 600
Portland, Oregon 97232-2036

IN REPLY REFER TO:



December 9, 1996

ER 96/0593

Thomas W. Ferns, Project Manager
Comprehensive Land Use Plan
U.S. Department of Energy
Richland Operations Office
P.O. Box 550, MSIN A5-15
Richland, Washington 99352

RECEIVED
DEC 17 1996
DOE-RL/DCC

Dear Mr. Ferns:

The Department of Interior (Department) has reviewed the Draft Hanford Remedial Action Environmental Impact Statement (EIS) and Comprehensive Land Use Plan (Plan), Richland, Benton County, Washington. The following comments are provided for your information and use when preparing the Final EIS and the Plan.

GENERAL COMMENTS

The Department of Energy (DOE) does not identify a preferred alternative in the Draft EIS. However, the Department understands the DOE intends to identify a preferred alternative and provide an additional comment period. An additional comment period should be conducted following identification of the preferred alternative.

The Department supports selection of the Unrestricted Future Land Use alternative as the preferred alternative for the Columbia River and Reactors on the River areas because this alternative would provide cleanup most compatible with designation of the Columbia River as a Wild and Scenic River. However, we object to the Restricted Future Land Use (R2) for both the Reactors on the River and All Other Areas as currently described because the Draft EIS does not address the extensive impacts from borrow areas. The Final EIS needs to address mitigation for removal of shrub steppe habitat on 2,500 acres of borrow sites.

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The Final EIS also should include in the summary a one-to-two page description of the land use alternatives and the health risks associated with them.

The readability of many figures in the Draft EIS need to be improved. The Final EIS should provide them with scales and adequate explanations. The Final EIS should acknowledge the high potential of the unsaturated zone for inhibiting contaminant migration, and indicate the progress being made to quantify that role.

Land Use Planning

The Department is concerned about the "Hanford Site Comprehensive Land Use Plan" being included in the Draft EIS as Appendix M. The Plan has not been included in a National Environmental Policy Act (NEPA) process until now, and it has not had the benefit of a scoping process and a formal comment periods soliciting public input'. Thus, the Plan should be separated from the Final EIS.

The establishment of land use designations on the Hanford Site may be considered a major Federal action which would require impact analysis under the NEPA process. We suggest a separate NEPA process for analyzing the Plan to employ a public involvement process to develop alternatives for designating land use. As some bureaus of the Department are concerned with the currently proposed land use designations, the Department requests formal involvement in the land use planning process. Also, employing the NEPA process for the Plan should allow concerns of our Bureaus be addressed in a public forum. In addition, establishing land use designations for the Columbia River would require consultation with the Fish and Wildlife Service (FWS) under the Fish and Wildlife Coordination Act (16 U.S.C. 661-667e, as amended) and with the Department under Public Law 100-605.

The Department is cognizant of DOE's need to establish future land use objectives to facilitate remedial actions and to include the Plan in the Draft EIS for this purpose. However, in several cases we are unable to understand how the land use designations have any bearing on the remediation strategy or exposure scenario. The Open Space Restricted designation is ambiguous enough to allow any remediation alternative or exposure scenario, and it should provide support for development of effective remediation strategies. It is not clear how the Potential Economic Development Zone area and most of the Industrial and Commercial area (with the exception of the 300 Area) designations assist with developing a remediation strategy or in choosing

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cleanup levels or exposure scenarios. These two land use designations appears to be outside of the purpose of the Draft EIS. As discussed in the preceding paragraph, this type of land use planning should be conducted under a separate NEPA process, and, furthermore, future land use objectives discussed in the Final EIS should be closely tied to its purpose.

The Plan may not even be needed for this DEIS because it may be more appropriate for land use planning to be limited to identifying future land use restrictions under various cleanup alternatives. In addition, future land use restrictions are already encompassed in the remedial action alternatives presented in the Draft EIS.

For several years, The Nature Conservancy has been conducting a biodiversity inventory and documenting the natural resources at the Hanford site. In 1997, this inventory will cover the core area of the Hanford site, termed "All Other Areas" in the Draft EIS, and will inventory additional areas of high natural resource value. The land use designations should be delayed until this inventory is completed. This delay would be preferable to revising the land use designations to incorporate the 1997 inventory data and not having land use designations to protect the natural resources on the core area.

Cumulative Impacts

The Department is concerned about cumulative impacts to natural resources from cleanup, waste management, and other development activities at the Hanford site. The EIS should have a critical role in addressing the sitewide cumulative impacts which are stated in the Draft EIS' Purpose and Need chapter. One of the greatest potential values of this EIS is to provide a comprehensive analysis of cumulative impacts of cleanup and all other actions to natural resources, specifically shrub steppe habitat. The Cumulative Impacts in section 5.9 does not currently fill this need. The FWS is available to assist the DOE in developing a comprehensive cumulative impact analysis for shrub steppe habitat. The address and phone number for contacting the FWS are:

Eastern Washington Ecological Services Suboffice
Fish and Wildlife Service
P.O. Box 1157
Moses Lake, WA 98837
and
509/630-6270

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Borrow Areas and Backfill

The Department is concerned the Draft EIS does not adequately discuss impacts to the borrow areas, particularly the removal of shrub steppe habitat to create borrow areas. According to Appendix E, borrow sites would remove about 2,500 acres (almost 4 square miles) of shrub steppe habitat. We consider removal of shrub steppe habitat to have potentially significant environmental impacts. In addition, the backfill needed to replace contaminated soils from removal actions should be discussed. Habitat impacts and mitigation for the remediated areas are discussed in the Draft EIS. However, the habitat value of contaminated sites on the remediated areas is likely to be low while the borrow areas are likely to be covered by an intact shrub steppe ecosystem having high habitat value. This issue further emphasizes the need for the Final EIS to fully describe and discuss the impacts from removing shrub steppe habitat to create borrow areas.

Impacts to habitat and other natural resources from creating borrow sites, including backfill or cap material, should be addressed in the sections on impacts to natural resources for each of the four areas and each remedial alternative. Differences in impacts to habitat and other natural resources among the remedial alternatives should be clearly presented in the Final EIS to allow comparisons be made. Commitments for mitigating habitat impacts at borrow sites need to be similar to those currently provided for remedial areas.

The Draft EIS identifies borrow sites for fine-grained materials and gravel without considering alternative sites. While alternative borrow sites were developed for basalt, differences in environmental values were not adequately examined or taken into consideration. The Final EIS or a subsequent NEPA document should include alternatives to borrow sites for fine-grained materials and gravel, and consider the natural resource values of the sites when selecting a preferred alternative.

The Draft EIS identifies the McGee Ranch as the borrow site for fine-grained materials for capping waste sites. The McGee Ranch serves as the only habitat corridor between the only two large blocks of shrub steppe habitat, the Hanford site and the Yakima Training Center, left in the State of Washington. The FWS considers the McGee Ranch as an irreplaceable and unmitigable natural resource, and any impacts to the natural resource values on the McGee Ranch prior to an evaluation of alternatives with appropriate public input would be objectionable. Mitigation to replace the McGee Ranch as a wildlife corridor would involve

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developing native plant communities on heavily disturbed subsoils. Such development would likely be expensive and perhaps infeasible.

In addition, the Final EIS should discuss potential liability for injury to natural resources under Comprehensive Environmental Response Compensation and Liability Act (CERCLA). Since impacts at borrow sites may be a direct result of cleanup of releases of hazardous substances into the environment, full mitigation for impacts to habitat and other natural resources should be provided.

Irreversible and Irretrievable Commitments

Section 5.11 of the HRA-EIS states that identification of irreversible and irretrievable commitments of resources "is the subject of exclusions from liability under Section 107(f) of CERCLA." Identification of committed resources, however, is only one of several conditions which must be met for the Section 107(f) exclusion to apply. For example, Section 107(f) requires that the committed resources be specifically identified and that a permit or license authorize the commitment of resources. It is not apparent from the HRA-EIS how all the conditions of the Section 107(f) exclusion would be met. Further, even if these conditions were met, it is not clear that the Section 107(f) exclusion would apply to resources committed in remediation of past releases at the Hanford Site.

As stated above, The Department is opposed to using the McGee Ranch as a borrow area because it serves as a wildlife corridor and its value in that function cannot be replaced. If the DOE includes the McGee Ranch as a borrow site, the loss of this wildlife habitat area and irreplaceable value as a wildlife corridor has to be identified. However, if the habitat resources and corridor values of the McGee Ranch are committed as irreversible and irretrievable uses, a commitment must be made to mitigate all impacts to the fullest extent possible.

Ecological Risk Assessment for the Columbia River

The Purpose and Need statement states "The goal of this EIS is to provide decision makers with the information necessary to make an informed decision about the environmental impacts associated with Hanford Site remediation." In order to accurately provide information on environmental impacts of the Columbia River Geographical Area cleanup alternatives, an ecological risk assessment or similar methodology needs to be employed. It also is needed to ". . . ensure that sitewide future land-use

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objectives are considered." In addition, an ecological risk assessment is needed to determine the different impacts of the alternatives on the river ecosystem for considering the Wild and Scenic River designation in land use decisions for the Columbia River in the Hanford Reach.

Ecological risk assessments should be conducted for the Columbia River and Reactors on the River Areas at a minimum. The DEIS states that one of the goals for cleanup of groundwater under the Unrestricted Future Land-Use alternative of the Reactors on the River area is to "protect the Columbia River and its associated Ecosystem (page 3-21)." The Final EIS should provide an ecological risk assessment to determine levels of groundwater cleanup necessary to protect the river ecosystem.

Habitat Value

The Draft EIS identifies mature native shrub communities as sensitive habitat to be considered when identifying project impacts. We support protection of mature shrub habitat; however, we suggest DOE expand its perception of what constitutes valuable shrub-steppe habitat. The FWS considers any area with a majority of native plant species to be highly valuable, even though some shrubs are absent or just recovering.

SPECIFIC COMMENTS

Draft Environmental Impact Statement - Summary

Page Summary 9. Box The designation for Environmental Restoration includes industrial and commercial land use activities. The Final EIS should clarify the intent for listing these activities. These activities should be eliminated unless they relate specifically to the environmental restoration activities. Otherwise, they conflict with the potential Wild and Scenic River designation. Also, many unique and limited resources could be included in the Special Use Areas designation. However, because few areas are identified on the site map, additional information should be provided on the criteria used to designate the Special Use Areas.

Page Summary 21. Table S-3 and elsewhere For any Area and alternative impacting wetlands, the "Actions to be Implemented" section in the Tables should include "Mitigate for lost functions and values of impacted wetlands" as required by the Clean Water Act. The Final EIS should provide a similar statement in the text wherever a reference to wetlands or mitigation is made.

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Page Summary 41. Table S-8 We recommend adding an additional row to this table. It would provide the required consultation of natural resource trustees under CERCLA Section 104(b)(2), and should read as follows:

Subject Area: trust natural resources
Basis for Consultation: Comprehensive Environmental Response, Compensation, and Liability Act,
Agency: U.S. Department of Interior, National Oceanic and Atmospheric Administration, Washington State, Oregon State, Nez Perce Tribe of Idaho, Confederated Tribes of the Umatilla Reservation, Confederated Tribes of the Yakima Indian Nation of the Yakima Reservation and Confederated Tribes of the Warm Springs Reservation of Oregon.

Draft Environmental Impact Statement - Volume 1
Chapters 1-8

Page 1-5. Line 1 The Final EIS should define the three access levels here or reference them to the box on page 3-3.

Page 3-18. Section 3.2.3 The Final EIS should state the difference in depths of excavation between the Unrestricted and R1 alternatives.

Page 3-21. Line 20 This line state seems to imply pump and treat would be the primary treatment for contaminated groundwater other than natural attenuation even though several other technologies are being considered. We suggest this section be modified in the Final EIS to reflect alternatives offering other technologies.

Page 3-28. Section 3.2.5.2 and 3.2.5.2.1 Since the early 1940's, public domain lands on the Hanford Reservation have been withdrawn from public use by predecessor agencies to the Department of Energy for various reasons related to Hanford's mission. The original intent of the enabling legislation was the withdrawn lands be returned to public use upon completion of the mission.

Much of the land in the All Other Areas geographic area has not been contaminated and is remotely located from the contaminated sites. If these lands are no longer needed for defense purposes as identified in the original lands withdrawal, the withdrawal must be relinquished. The lands may not be used for other unauthorized purposes. We suggest an additional alternative be analyzed for the All Other Areas designation. This alternative should analyze a combination of Restricted and Unrestricted land

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use designations to provide for relinquishing of the unneeded portions of these lands from withdrawal.

Page 3-35. Lines 1-6. First Bullet Statement This bullet statement indicates the DOE has sold withdrawn public domain lands to the State of Washington for the disposal of extremely hazardous wastes. The validity of this sale should be verified in the Final EIS as the DOE is not authorized under the terms of the withdrawal to sell public domain lands.

We recommend the State's proposed disposal site be moved to an area close to the U.S. Energy Research and Development Administration and the U.S. Ecology sites. This move would consolidate waste sites in one area, and thereby reduce future risks and limiting impacts to natural resources.

Page 3-35. Lines 8-16. Second Bullet Statement and Figure 3-3 The discussion in this bullet statement is confusing. If the withdrawn lands are not returned to the Department, unrestricted future land use of uncontaminated parcels remote from waste sites would not be an inconsistent use. This inconsistency demonstrates the need for the analysis of an additional alternative as suggested in our above Page 28 comment. However, unrestricted future land use or management of portions of the All Other Areas geographic area may be feasible and logical.

The title for the Figure 3-3 is not accurate. The title should read "Federal Acquired and Withdrawn Lands in the Hanford Site". Although most parcels shown in the map are correctly configured, several do not match the records of the Bureau of Management (BLM). They are located mainly in the Gable Mountain area. Please contact the BLM Spokane District Office at telephone 509/536-1200) to resolve these inconsistencies.

The "brown" lands south of the Columbia River, with a few exceptions, are public domain land which are withdrawn as part of Hanford. The exceptions are several parcels near the river in the southeast part of the site. They have been withdrawn for the use of the Corp of Engineers and Bureau of Reclamation (BOR). Please contact the BLM Spokane District Office at the number given above for more accurate description of the correct boundaries.

Page 3-37. Lines 13-16 When restrictions on public access no longer need to be maintained, the withdrawn lands should be returned to public domain status and appropriate management.

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Page 3-37. Line 34 This section states the Mitigation Action Plan (MAP) would be issued after the Record of Decision is made. In other sections of the Draft EIS, commitments are made to coordinate with the FWS and other natural resource agencies. With few exceptions, the past MAPs have been issued with little or no involvement of the natural resource agencies, and have not contained enough information to implement successful mitigation. Technical assistance should be obtained from the Service and other natural resource agencies early in the planning process.

Page 3-39. Table 3-12, Column 3 Under the Mitigation Measures section, we suggest replacing the phrase "...and employing a no net-loss protocol when disturbing wetlands" with "...and replacing lost wetland functions and values" in the Final EIS.

The Final EIS should include provisions for monitoring impacts to aquatic biota during and after remediation activities in the river and near its shore, and should provide for restoration or enhancement of any impacted natural resources.

The Final EIS should provide mitigation for shrub steppe habitat impacted by river cleanup, and including measures for avoiding and minimizing impacts. The mitigation should consider this shrub steppe habitat greater habitat value because it has closer proximity to the river than in areas away from the Columbia River.

Page 3-44. Table 3-13 The R1 and R2 alternatives would have substantially different impacts to shrub steppe and other types of habitat because of impacts at borrow areas under the R2 alternative. Therefore, mitigation measures should be different as well. The Final EIS should show these differences in Table 3-13 and elsewhere in the document. Additionally, if fine-grained materials are borrowed from McGee Ranch, the loss or reduction of the wildlife corridor to Yakima Training Center should be identified as an impact.

Page 4-19. Section 4.2.1. Last paragraph The flow discharges given for the Columbia and Yakima Rivers are within about 5 percent of those published by the United States Geological Survey. The differences appear to be caused by conversions from the foot-pound to metric and back to the foot-pound system of units. These differences should be corrected or the reason for the discrepancies should be disclosed in the Final EIS.

Page 4-20. Figure 4.9 This figure shows a dam about 15 miles upstream from Richland that does not exist. This should be verified, and corrected in the Final EIS.

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Page 4-21. Section 4.2.1. 7th paragraph The Final EIS should note cold and Dry Creek also drain areas within the Hanford Site, as well as areas to the west of the Site.

Section 4.2.1. 11th paragraph Although the ponds are not accessible to the public, the Final EIS should note water seeping from the ponds to the ground-water system eventually discharges to the Columbia River where it would be accessible to the public.

Page 4-22. Section 4.2.1. Last paragraph Change precipitation units from cubic yards to cubic feet.

Page 4-22. Section 4.2.1.1. First paragraph. The difference between the largest flood of record [21,000 cubic meters per second (cm/s) in 1894] and the largest flood (20,000 cm/s in 1948) in recent times after many of the dams were build is small. Hence, the statement that "the likelihood of recurrence of large-scale flooding has been reduced by...dams upstream of the Hanford Site" is not supported by the data given. Since much of the present flood protection is from dams built after 1948 (The largest reservoir storage dam, Grand Coulee, was in operation in 1941), the Final EIS should use flood flows that occurred after these dams were constructed as supporting data.

Page 4-24. Section 4.2.1.1. 5th paragraph It is probable that the resulting discharge from a failure of Grand Coulee Dam also would cause downstream dams (Chief Joseph, Rocky Reach, Wanupum, Rocky Island, and Priest Rapids) to fail. Therefore, the discharge of 600,000 cm/s at the Hanford site, calculated under the assumption that the downstream dams would not fail, is probably low. The Final EIS should include a discharge figure based on failure scenario of the downstream dams.

Page 4-28. Section 4.2.2.1. First paragraph The Final EIS should include the Imnaha and Picture Gorge Basalts as parts of the Columbia River Basalt Group.

5th paragraph Although the Hanford/Ringold unit is outside of the Hanford Site, the Final EIS should note that it also receives considerable recharge from infiltrating irrigation water and leaky irrigation canals.

Page 4-30. Section 4.2.2.2. First paragraph Although, "some investigators" conclude that no downward percolation of precipitation occurs, the Final EIS should note this may not necessarily be the dominant opinion. For example, Gee and others in 1992 ("Variations in Recharge at the Hanford Site", Northwest Science, volume 66, number 4, pages 237-250), conclude from

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lysimeter data that recharge of 40 to 111 millimeters per year occurs at non-vegetated, coarse-soiled sites. These conditions are frequently found at waste sites at the Hanford Site.

Page 4-34. Section 4.2.2.4.1. Last paragraph The last sentence should be qualified in the Final EIS by changing it to read: "All groundwater mounds near the reactors on the river have dissipated." However, those near the 200 area are still affecting ground-water flow.

Page 5-21. Section 5.2.4.2.2.1. Line 14 Meeting the substantive requirements of Section 404 of the Clean Water Act would necessitate mitigating wetland impacts. Therefore, the word "Potential" in the subtitle should be removed here and elsewhere in the Final EIS where wetland mitigation is discussed.

Line 24. Fourth Bullet Statement The wording of this bullet be changed to read "replacing damaged wetland functions and values through..." in the Final EIS. The FWS' Mitigation Policy recommends purchase of existing habitat for compensatory mitigation be used only at last resort and then only if the area to be purchased is in imminent threat of destruction. Since wetland habitat similar to that found along the Hanford Reach has been mostly destroyed by dams, purchase of such habitat is an unlikely option.

Page 5-21. Section 5.2.4.2.3. Line 29 As previously stated in the general comments, the Final EIS should provide mitigation of shrub steppe habitat impacted by river cleanup. The mitigation should include measures for avoiding and minimizing impacts. Shrub steppe habitat in proximity to the Columbia River has greater habitat value than it has areas away from the Columbia River.

Page 5-23. Section 5.2.4.2.5 As previously discussed in the general comments, the Final EIS should provide an ecological risk assessment for the Columbia River. However, monitoring of aquatic organisms should be conducted during and after remediation.

Page 5-23. Section 5.2.4.2.6. Line 42 The description of impacts to biodiversity should be specific. The riverine wetland types found along the Hanford Reach are rare because they have been inundated on most of the Lower Columbia River. The Nature Conservancy in 1996 identified six Element Occurrences (plant communities of statewide conservation significance) which probably contribute substantially to the Reach's biodiversity. Two of these Element Occurrences may occur within cleanup areas.

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The Draft EIS Species of Concern section lists two plant species with State endangered status. The Nature Conservancy report indicates riverine wetlands have 13 rare plant species and 5 unlisted but uncommon species associated with riverine wetlands. These species may contribute to the biodiversity of the Hanford Reach. The Final EIS should provide information on the unique species, plant communities, and habitats which enhance the biodiversity in the Hanford Reach.

Mitigation for impacted riverine wetlands should focus on habitat qualities which support species of concern or those species which contribute to biodiversity as described in the preceding paragraph.

Page 5-65. Third Bullet Statement. Line 32 This bullet statement is vague; the Final EIS should clarify the purpose of mitigation. It also should include the mitigation list, provided on page 5-123, in this section.

Page 5-68. Line 45 The impacts to shrub steppe from borrow sites have been previously discussed in the above general comments. They should be listed here.

Page 5-71. Line 12 The potential ecological risks of leaving waste in place differ substantially compared to excavation for the other two action alternatives. In the event of upstream dam failure, the Final EIS should state the risk of large amounts of contaminants being released into the Columbia River.

Page 5-99. Line 16 As discussed in the above general comments, the Final EIS should include the impacts to shrub steppe from borrow sites in this section.

Page 101. Line 19 This commitment for restoring the native plant community is commendable. However, the Final EIS should clarify whether or not restoration of native plant communities on waste caps is feasible or desirable. A separate bullet for revegetation of caps may be appropriate.

Page 5-123. Line 45 The Final EIS should include discussions made in the general comments on impacts to shrub steppe from borrow sites in this section.

Page 5-202. Line 37 The Final EIS should note the Environmental Restoration Disposal Facility Record of Decision does not commit to a location for borrowing fine materials, and remove the reference to McGee Ranch. In addition, we are unaware of a borrow site commitment in another document.

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Page 5-213. Section 5.10 The Final EIS should discuss impacts to habitat from construction of borrow areas.

Page 5-215. Line 30 and Table 5-61 The maximum amount of disturbed shrub steppe habitat reported in the text (line 30) is 1,153 acres, but the total of the disturbed shrub steppe habitat listed in Table 5-61 is 1510 acres. This difference should be rectified in the Final EIS.

Page 5-217. Section 5.12 The DOE and the FWS are currently negotiating a use permit to allow the FWS to manage the Arid Lands Ecology Reserves (ALE Reserve). However, one of the proposed basalt borrow sites is on an ALE Reserve. This proposal for a basalt borrow site on an ALE Reserve creates a potential conflict with the management proposed for wildlife and habitat quality. Although the ALE Reserve is not considered in the Draft EIS, the basalt for caps is. This potential conflict should be discussed in the Final EIS.

Page 6-1. Section 6.0 Although CERCLA cleanup actions below the high water mark do not require a Section 404 permit under the Clean Water Act, the substantive requirements must be met. We suggest the Final EIS discuss the Section 404 requirements in section 6.1.4 and in a section which would be developed to address the Fish and Wildlife Coordination Act. The Natural Resource Damage Assessment regulations should be referenced as DOE's trust responsibility for restoring damaged natural resources has implications on land use and remedial action decisions. In addition, the National Oil and Hazardous Substances Pollution Contingency Plan should be included as it defines DOE as a natural resource trustee.

Page 6-3. Section 6.1.6 Since a Natural Resource Trustee Council is active at Hanford, this overview of the CERCLA should include information that the DOE has the responsibility to notify trustees of potential damages to natural resources and to coordinate assessments, investigations, and planning with trustees.

Page 6-5. Line 44 The word "Migration" should be replaced with "Mitigation."

Page 6-11. Section 6.4 Because this Draft EIS has a sitewide scope involving natural resources of high value, the Final EIS should include the DOE policies that pertain to natural resources. They include: the land and facility-use policy issued by the Secretary of Energy on December 21, 1994, the Biological

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Resources Management Plan, and the Biological Resources
Mitigation Strategy.

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Appendices D and E

Page D-5 to 6. Appendix D. Section D.2.2 Limitations of the
pump-and-treat technology should be discussed in the Final EIS.

Page 11. Bottom paragraph Although there is no remediation
method for removing tritium from ground water, the Final EIS may
include the following approach used at the Savannah River Plant:

Recycling the contaminated water through pump-and-treat
cycles provides protection for the environment down gradient
due to the short half life of tritium.

Page D-12. Section D.3 The text and the information referenced
in Table D-3 do not match, and the reference in the text to Table
D-4 seems to refer to Table D-5. Also, a referenced table
appears to be missing. The accuracy of the references made in
the text to certain tables should be verified in the Final EIS.

Page D-12. Bottom paragraph Since the text refers to nitrate in
the 100-B/C area, the Final EIS also should list nitrate in Table
D-2.

Page E-1. Paragraph 5 and 6 These paragraphs discuss conflicts
between engineering and cost considerations and cultural resource
value for basalt quarry sites. Although alternatives have not
been developed for fine materials borrow sites, the Final EIS
should include a comparison of the benefits of the McGee Ranch as
a wildlife and habitat corridor to the benefits of borrowing.

Page E-12. Line 27 The only natural resource value the
evaluation factors consider for basalt quarry sites are
threatened and endangered species. Since these basalt quarry
sites include plant communities and plant species not found
elsewhere on the Hanford site, the Final EIS should include these
plant resources and other natural resources in the evaluation
factors.

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Appendix M - Comprehensive Land Use Plan

Page TOC-9. List of Tables Because of the ownership pattern
within the Hanford boundary is complex, a table listing the

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respective acreages by agency should be included in the Table of contents to accompany Figure 4-1.

Page 4-4. Section 4.1.7 This section should include DOE's responsibility as a trustee under CERCLA to restore natural resources injured as a result of releases of hazardous substances.

Page 7-1. Section 7.1.1 Additional areas of major constraints should be identified following The Nature Conservancy (TNC) survey of 1997. Figure 7-1 should be updated with the data from the TNC survey before release of the next draft of the DEIS. The FWS has identified the McGee Ranch as an irreplaceable natural resource, and we recommend considering as an area with major constraints. In addition, we note the Safe Interim Storage mitigation site, as described in Table 7-1, should be included in the map in Figure 7-1.

Page 11-3. References The following reference should be added: The Nature Conservancy of Washington. 1996. Biodiversity Inventory and Analysis of the Hanford Site. The Nature Conservancy of Washington, Seattle, WA. 55pp.

Pages 8-7. Table 8-3. Comparison of Proposed and Projected Future Land Use Against Values Important to Land Use Planning
The status of the withdrawn lands will continue to be a management constraint until their status is resolved. A statement to this effect should be included in Table 8-3. For example, if the Draft Plan identifies areas that are not needed for defense purposes, the withdrawal should be relinquished. If other Federal uses are identified, an application may be filed to withdraw the lands for the specific purpose specified in the Plan, e.g., natural area. Use of withdrawn lands for any purpose other than that authorized in the Public Land Order is not authorized.

The Final EIS should include a statement identifying potential future use of the withdrawn parcels if the withdrawal is terminated. For example, the BLM's Spokane District Resource Management Plan specifies that if the Hanford withdrawal is relinquished, the lands will be managed for livestock grazing, recreation, wildlife and they would be available for exchange.

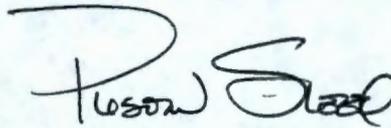
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Appendix A of the Draft Plan We have several concerns with assigning constraints as major, moderate, or minor in Table A-1. As our concerns are complicated, staff of the FWS is available to meet with staff of the DOE and is prepared to provide technical assistance and input to revise Table A-1.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Preston Sleeper". The signature is stylized with a large initial "P" and a long, sweeping underline.

Preston Sleeper
Acting Regional Environmental
Officer