



Washington Department of  
**FISH AND WILDLIFE**

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October 25, 1999

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**DOE-RL/DIS**

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

**Subject: Comments on Final Hanford Comprehensive Land-Use Plan Environment Impact Statement, DOE/EIS-0222-F**

Dear Mr. Ferns:

The Washington Department of Fish and Wildlife (WDFW) is providing these comments on the *Final Hanford Comprehensive Land-Use Plan Environmental Impact Statement, DOE/EIS-0222-F (FEIS)*. We request that U.S Department of Energy (USDOE) address the concerns detailed below in the Record of Decision (ROD) to be issued at the completion of the NEPA process.

First, we would like to commend USDOE for designating the Arid Lands Ecology Reserve, McGee Ranch/Riverland Site and the North Slope as Preservation which is consistent with National Wildlife Refuge (NWR) management. With these actions, USDOE will strengthen the integrity of Hanford's terrestrial ecosystem and further the protection of important aquatic resources within the Hanford Reach. We also applaud USDOE for designating both shorelines of the Columbia River as Preservation and for removing grazing from the Preferred Alternative. These actions are consistent with USDOE's stewardship role and policies on ecosystem management.

We are disappointed, however, that the FEIS does not address several concerns we have earlier expressed. We are generally concerned about the fate of biological resources that occur within central Hanford but outside the Preservation and Conservation designations delineated in the Preferred Alternative. Specifically, shrub steppe habitat, a Priority Habitat for WDFW, and attendant biological resources in the subject areas remain vulnerable to development.

074179

Mr. Thomas Ferns  
October 25, 1999  
Page 2

Further, it appears that the probable listing of Washington's sage grouse population under the Endangered Species Act (ESA) has not been considered by USDOE. The U.S. Fish and Wildlife Service is currently completing a 90 day review of an ESA petition to list sage grouse. Given the status and trends of Washington's sage grouse populations, it is unlikely that a decision to deny the petition could be sustained. Sage grouse are a shrub steppe dependent species that once inhabited much of eastern Washington and persisted at Hanford until at least the mid-1980s. Currently, there are only about 500 sage grouse remaining in the state and they are primarily confined to two populations. Their decline is attributed to the conversion and fragmentation of shrub steppe habitat. Even without a federal ESA listing action, we view the shrub steppe habitats of the Hanford Site as invaluable elements in the recovery of Washington's sage grouse.

Our largest area of concern lies in the southeast corner of the site, where Industrial and Research and Development designations overlay Level II (shrub steppe) resources. The FEIS relies on the *Draft Hanford Site Biological Resource Management Plan (BRMaP)* and its sub-tier document the *Draft Hanford Site Biological Resources Mitigation Strategy Plan (BRMiS)* to describe biological resources and to make decisions about mitigation requirements. The current drafts of BRMaP and BRMiS would require avoidance and minimization of impacts to Level II resources but would not require compensatory mitigation for unavoidable impacts. This single loophole puts more than 80,000 acres of shrub steppe habitat at risk. The FEIS calls for revisions to the two biological plans but there is no commitment to the outcome. We request that the ROD include a commitment to use the full mitigation hierarchy, as defined by the Council on Environmental Quality (CEQ), wherever impacts to biological resources occur at Hanford.

We also maintain that it is inappropriate for USDOE to invoke Irretrievable and Irreversible language to avoid the responsibility to mitigate for impacts to shrub steppe and other biological resources (See specific FEIS response RL318-44). Unavoidable adverse impacts can be substantially reversed and habitat functions restored through implementation of CEQ's mitigation hierarchy. There are many disturbed areas and old fields within Conservation designations where compensatory mitigation can be conducted. Especially with the potential ESA listing of sage grouse, USDOE and other federal agencies should exercise all practical means to contribute to the protection and restoration of sage grouse habitat.

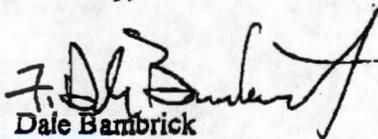
Our final concern also relates to potential shrub steppe impacts; due to the lack of a thorough NEPA analysis of geologic source sites. The current EIS process seemed to be the logical place for such an analysis, but no biological surveys were included for any of the source sites mentioned. We strongly endorse "*a coordinated NEPA analysis to address the gravel quarries on a site-wide basis*" (specific FEIS response #445-21). We request that USDOE commit to this analysis in the ROD, thereby honoring earlier commitments made in the Tank Waste Remediation System Environmental Impact Statement and addressing Hanford Natural Resource Trustee Council concerns expressed by letter to Mr. Paul Dunigan, USDOE, dated August 13, 1999.

Mr. Thomas Ferns  
October 25, 1999  
Page 3

074179

Thank you for the opportunity to provide these additional comments on the FEIS. We would be glad to meet with you and other USDOE managers to discuss these issues if necessary. Please call Ted Clausing (509-457-9314) if you have questions.

Sincerely,



Dale Bambrick  
Regional Director

cc: Jeff Koenings, Director, WDFW  
Keith Klein, USDOE-RL  
Bill Bradley, Yakama Nation  
Susan Hughs, Chair, HNRTC  
Paul Voros, USFWS



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State of Washington  
DEPARTMENT OF FISH AND WILDLIFE

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DATE: 10/25/99

TIME: 4:55 pm

TO: Keith Klein; USDOE @ Hanford

FAX #: 509-376-4789

FROM: Ted Claessing  
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**HL COMMITMENT  
CONTROL**

OCT 26 1999

**RICHLAND  
OPERATIONS OFFICE**

FAX #: 509-575-2474

NUMBER OF PAGES (including cover sheet): 4

NOTES: Please disregard the earlier FAX of the  
June 7<sup>th</sup> letter.

This is the correct letter (Oct 25, 1999) regarding  
the Comp. Plan FEIS.

Sorry