

9613503.2934

0045733

037885

START



STATE OF WASHINGTON

DEPARTMENT OF COMMUNITY, TRADE AND ECONOMIC DEVELOPMENT
OFFICE OF ARCHAEOLOGY AND HISTORIC PRESERVATION

111 21st Avenue S.W. • P.O. Box 48343 • Olympia, Washington 98504-8343 • (360) 753-4011

October 15, 1996

Mr. Thomas W. Ferns, NEPA Document Manager
Hanford Remedial Action
Environmental Impact Statement
U. S. Department of Energy
Richland Operations Office
P.O. Box 550, MSIN HO-12
Richland, Washington 99352

RECEIVED
OCT 28 1996
DOE-RL/DCC



Log: 101496-01-DOE
Re: Comments on Draft Hanford
Remedial Action Environmental
Impact Statement and
Comprehensive Land Use Plan

Dear Mr. Ferns:

The Washington State Office of Archaeology and Historic Preservation (OAHP) is in receipt of the above referenced documents. On behalf of OAHP I have reviewed portions of the draft Hanford Remedial Action Environmental Impact Statement (DEIS) and Comprehensive Land Use Plan (Plan) in regard to how significant cultural resources (including archaeological, historic, and traditional cultural properties) at Hanford are to be managed in future years.

To provide a bit of context for our comments, OAHP works closely with affected Tribes and the Department of Energy (DOE) and its cultural resource consultants toward identifying, evaluating and protecting cultural resource sites at Hanford. DOE is undertaking this effort in large part to comply with Sections 110 and 106 of the National Historic Preservation Act. As is referenced in the DEIS and the Plan, DOE has developed cultural resource management plans and programmatic agreements to streamline procedures for complying with the NHPA. It is also worth mentioning that OAHP regards the entire Hanford Site as a historic district eligible for listing in the National Register of Historic Places. Hanford is viewed as the largest and most important single historic property in the state with multiple layers of cultural and historic significance. As such, it is important that the Comprehensive Land Use Plan recognize the extent of the cultural resource base at Hanford and the need to plan accordingly.

Mr. Thomas W. Ferns
October 15, 1996
Page Two

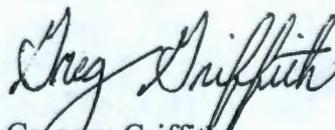
Following are a few comments and recommendations based upon my review of the DEIS and the Plan:

- * The documents are not clear as to how the work of DOE's cultural resource program is linked to the Plan. The historic preservation planning work being generated by DOE's cultural resource managers needs to be directly incorporated into the Plan plus all decision making and implementation procedures.
- * The draft Plan and DEIS appear to treat cultural resources at Hanford almost entirely within the framework of Section 106 and other regulatory processes. As a result, the Plan's approach to cultural resource management appears to be fragmented with mitigation performed on a site by site basis. For a more comprehensive and effective planning strategy, I recommend that the Plan treat cultural resources as a land use meriting a site-wide protection approach. Tribal involvement is critical to the success of any planning approach which may affect sites of cultural and/or religious value.
- * I note that the B Reactor is identified as a potential museum facility and part of a proposed state park. Clearly, the preservation and interpretation of B Reactor is important. However, Hanford's historical significance is much larger than the historic events at B Reactor. Therefore I recommend that the Hanford Land Use Plan include a comprehensive and visionary interpretation strategy which encompasses the entire Site and its multiple historic themes. The Plan should also recognize the implications of an interpretation plan to other land use decisions being made for historic properties at the Site.
- * I also recommend the Plan address the potential for the Site to become a focus for education, training and cultural tourism. If properly preserved and interpreted, the Hanford Site could well become an important visitor destination with significant economic benefits for Richland and Benton County.

Mr. Thomas W. Ferns
October 15, 1996
Page Three

Thank you for the opportunity to review and comment on the DEIS and the Hanford Comprehensive Land Use Plan. Should you have any questions, please feel free to contact me at (360) 753-9116.

Sincerely,



Gregory Griffith
Comprehensive Planning Specialist

GAG:tjt

cc: Dee Lloyd, DOE Cultural Resources Program
Paul J Krupin
Phil Mees/Ben Floyd, Benton County
David Nicandri, Washington State Historical Society
Dennis Rhodes, City of Richland