



IN REPLY REFER TO:

# United States Department of the Interior

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JUN 4 1999

Mr. Thomas W. Ferns, HRA-EIS Document Manager  
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**RECEIVED**

**JUN 09 1999**

Dear Mr. Ferns:

**DOE-RL / DIS**

Thank you for the opportunity to review the Hanford Remedial Action Environmental Impact Statement (HRA-EIS) and Comprehensive Land Use Plan (CLUP). The U.S. Fish and Wildlife Service (Service) has several comments for consideration. The Service does not object to changing the name of the document to the Hanford Comprehensive Land-Use EIS. The Service appreciates having worked with the Department of Energy (DOE) on the CLUP, and is grateful for DOE's consideration of Service input on the planning team and the opportunity to provide comments on previous drafts. We believe that the CLUP provides a foundation for the Service and DOE to cooperatively protect and maintain one of the Nation's most precious natural areas.

The Service generally supports the DOE Preferred Alternative as shown on the map in Figure 3-3, but suggests the following changes be added from the map of Alternative One, Figure 3-4:

- Show the proposed expansion of the Saddle Mountain National Wildlife Refuge boundary, as shown in Figure 3-4, to include the ALE Reserve, McGee Ranch, Riverlands, Wahluke State Wildlife Recreation Area, and those parts of the Columbia River and its islands within the Hanford Site. *(This expanded refuge designation recognizes that these areas include the bulk of the highest quality shrub-steppe habitat on the Hanford Site and most of the critically important Hanford Reach segment of the Columbia River. By no means, however, does that imply that the resource values of the remainder of central Hanford are not important. Gable Mountain, Gable Butte, the Columbia River Corridor, the Hanford Townsite, the sand dunes, and connecting habitat corridors all need to be preserved.)*
- Extend the "Preservation" designation (dark green) to include the Riverlands.
- Do away with the designation of "Conservation (Mining and Grazing)" for any lands within the Hanford Site. *(While other agencies might wish to reserve the option for grazing, the Service does not. When it comes to managing the sensitive shrub-steppe vegetation and rare plant communities of Hanford, we view the adverse impacts of grazing to outweigh any possible benefits. Among other things, grazing livestock help spread invasive weeds. See remarks under "General Comments").*
- Delete the area reserved for industrial development east of the 200 Area near Mae

Junction and north of the 300 Area from potential industrial development. *(The area east of the tracks is important as a buffer zone for the Hanford Reach of the Columbia River and as a wildlife habitat and movement corridor.)*

The Fish and Wildlife Service recognizes that DOE has concerns about the potential future reopening of the rail corridor from the Tri-Cities to Seattle through Hanford, and for the need to quarry basalt rock for future cap material to be used in a cleanup of Central Hanford sites. If, as a last resort, the basalt cap material must come from the area of the ALE shown on the map in Figure 3-3, the Service can work with DOE to assure that the refuge designation for that area will not preclude such use. Likewise, if the potential for reopening the railroad line through the Riverlands area is a significant concern, the designation of a refuge boundary in that area can also be crafted to allow for that existing right of way.

### General Comments

Invasive species represent a significant threat to fish and wildlife habitat under all alternatives, including the no action alternative, in the HRA-EIS. Invasive species are defined to be those non-native flora and fauna present when either the HRA-EIS was written or that has the potential to invade the terrestrial or aquatic habitats. Many invasive species associated with Hanford (such as European starling, cheatgrass, and Russian thistle) are less manageable because of their abundance. Other species, particularly noxious weeds, are in small enough populations to be manageable. We recommend that the Invasive Species Executive Order 13112 (Feb. 3, 1999) be included in Section 1.2.6 Biodiversity in the NEPA Process.

We recommend adding the following text to section 1.2.6: Each disturbance factor on a given tract of land weakens the native plant community causing potentially catastrophic and accelerated change in landscape components. Any activity proposed for a site that disturbs the vegetation and soil surfaces should be examined for the effect on invasive weeds and consequences to site biodiversity. If such disturbance activities do occur, it is important to consider how the effects of disturbance will be managed, before the action takes place.

Specific actions should also be taken to help prevent the introduction and/or spread of invasive weeds through the movement of equipment and the use of roads on the Hanford Site. For example, equipment moved onto Hanford should be steam-cleaned and washed free of vegetation and soil debris at an off-site location before being placed on-site to remove invasive plant seeds and reproductive parts. Any road activity should be closely monitored for invasive plants and immediate management action should be implemented to stop invasive species becoming established along roadsides.

### Specific Comments

#### Sections 3.2.2 and 3.2.3 Land Use Designations and Land Use Suitability

As discussed earlier, the Service suggests that the designation "Conservation (Mining and Grazing)" be eliminated for the reasons given. The definition of mining needs to be expanded to distinctly explain that managed mining does not include removal of ore bodies and the use of chemical agents to extract precious metals.

Page 3-17 Assumptions Regarding Future Use

We recommend that if there are any other industrial uses intended within any of the land use designations (such as transportation corridors), they should be described in the preferred alternative.

Page 3-18, Figure 3.3

We recommend that the Refuge boundary shown in Figure 3-3 be changed to reflect the boundary shown in Figure 3-4. This would add the McGee Ranch, Riverlands, ALE, and the portion of the Columbia River and its islands within the Hanford Site to the refuge area of the North Slope.

The boundary of the ALE, McGee Ranch, Riverlands and the Columbia River, and river islands should be stippled to show these areas as National Wildlife Refuge boundaries.

We recommend that the ALE be shown with stippled boundaries as is the North Slope. At a minimum, the Fitzner-Eberhardt ALE Reserve boundary should be stippled and preferably the McGee Ranch and Riverlands boundary also. The map would then reflect the text found on page 3-2, lines 35 to 51 that discusses the portions of the Hanford Site that the Service manages under a permit. Page 3-22 lines 48 to 53 and page 3-23 lines 1-9, which discuss the disposition of McGee Ranch and Riverlands. The ALE is managed under a permit, and, as the text states, the Service could soon have the authority to manage ALE as part of the National Wildlife Refuge System (NWRS). The DOE proposes to use a low-wildlife value portion of the ALE as a quarry site in return for preserving the McGee Ranch as a wildlife corridor.

The River, islands, and 1/4-mile corridor are referred to in the text, page 3-20, lines 41-44, as Preservation. The Service would be the agency to manage this Preservation area, as discussed in the Hanford Reach EIS.

Page 3-22, Preferred Alternative

The Arid Lands Ecology Reserve (ALE) (3.3.2.3.5) should encompass the McGee Ranch and Riverlands should be included as Preservation. Also, the proposed refuge boundary should be extended to include both of these areas and the ALE.

Page 4-4 (4.1.2.1) Wahluke Slope

The discussion contained in lines 23 through lines 27 should be changed to reflect that several sites existed on the Wahluke Slope that were used for disposal of non radioactive hazardous waste. The sites were subject to an Expedited Response Action for remediation. Although remediation took place, the landfills may still have hazardous materials that can cause injury to trust resources.

Page 4-7 (4.1.2.5) Fitzner/Eberhardt Arid Lands Ecology Reserve (ALE)

Line 16 should be modified to identify the presence of two landfills on the ALE, at least one of which was used for disposal of a non-radioactive hazardous waste. Although remediated, one of the landfills may still have hazardous materials that can cause injury to trust resources.

Page 4-19 (4.2.4) Geological Hazard

The Title of Figure 4-8 needs an addition to the heading to clarify that the Geological Hazards are related to economic land uses such as irrigated farming in the “red zone” and not a natural geological event such as an earthquake.

Page 4-29, Vernal Pools

Approximately 20 vernal pools exist on the Hanford site. These are systems of significant quality and should be consistently and carefully monitored for invasive species. Immediate management to stop such invasive plants should occur once detected.

Page 6-4, Section 6.3.2

The HRA-EIS indicates that Biological Resources Management Plan (BRMaP) and the Biological Resources Management Plan and Implementation Strategy (BRMiS) be modified to be consistent with the Comprehensive Land Use Plan (CLUP) policy. The BRMaP and BRMiS are the DOE policy documents that provide guidance regarding the protection of habitats and species based on the ecosystem management principles stated in DOE Policy Document P 430.1. In October of 1998, DOE issued a memorandum about “Ecosystem Management and Land Use Principles.” The policy states that DOE’s stewardship will be based on ecosystem management principles. These BRMaP and BRMiS documents are completely independent of any land use planning effort and are not sub tier documents of the HRA-EIS. As stated above, it is DOE’s policy that any land use planning effort conform to ecosystem management principles. If a threatened and endangered species is found to be occurring anywhere on Hanford, the guidance in the BRMaP would have to be adhered to regardless of the land use designation. Within a few months the BRMaP will be a DOE policy document, and there needs to be a clear understanding of the jurisdictional differences between the BRMaP and the CLUP. Just because an area may be designated for a given land use, this does not preclude the guidance in the BRMaP from being followed if a sensitive species or unique habitat is identified in that area.

Page 6-8, Sections 6.4 and 6.4.1

The makeup of the Site Planning Advisory Board (SPAB), as described, is highly unbalanced. Depending on how it is put to use, the SPAB could become a difficult entity to deal with if it continues to reflect the current pro-development ideals promoted by county government. Under the proposed representation shown, Adams County with only a half section of land within the Hanford Site, has equal standing with the other entities, Richland is the only city represented, all

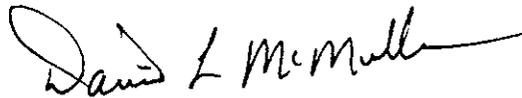
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of the tribal interests would be represented as one, and conservation groups with long-standing involvement in Hanford issues would not be represented. The SPAB should be more representative of the entities with vested interest in Hanford land and resource management.

If you have any questions concerning these comments, please contact Don Voros, Refuge Supervisor at (503) 231-6167 or Don Steffeck, Chief, Division of Environmental Contaminants at (503) 231-6223.

Sincerely,



**ACTING**

Regional Director