

0051039

069661

317 Fuller St.
Richland, WA 99352
946-8966

June 7, 1999

Mr. Thomas W. Ferns
U.S. Department of Energy
Richland Operations Office
P.O. Box 550, MSIN HO-12
Richland, WA 99352-0550

RECEIVED

JUN 11 1999

DOE-RL/DIS

Dear Mr. Ferns,

Thank you for the opportunity to comment on the Hanford Remedial Action Environmental Impact Statement and Comprehensive Land Use Plan (HRA). I am pleased the U.S. Department of Energy (DOE) has undertaken land use planning for the Hanford Site. The irreplaceable ecological values of the Wahluke Slope, the Hanford Reach of the Columbia River, the Arid Lands Ecology Reserve (ALE), and central Hanford need to be recognized by all – and protected by all – during clean up operations. The HRA should be a good roadmap to prevent needless destruction of these important critical areas, while ensuring an adequate land base for clean up, economic development, and future missions. Elements of DOE's preferred alternative in combination with elements of Alternatives 1 and 2 recognize these values. My preferred alternative would be a combination of these three Alternatives, but most closely resembles Alternative 2. Alternative 3 calls for far too much development, and will lead to the destruction of those qualities that make the Hanford Site unique and valuable.

The following comments are offered for your consideration:

- Designate all lands within the Arid Lands Ecology Reserve, Wahluke Slope, Columbia River islands, Riverlands, and most of the McGee Ranch as Preservation. All of these areas should be managed by the U.S. Fish and Wildlife Service (USFWS) as a National Wildlife Refuge. The Columbia River and an area on average ¼ mile from either shore should be designated a Recreational Wild and Scenic river.

Under DOE contract, the Nature Conservancy has conducted a biological survey of Hanford, finding 42 species new to science and at least 48 more species of plants and animals classified as rare or endangered on state or federal lists. The McGee ranch and the Riverlands area provide an invaluable wildlife corridor between the Yakima Training Center and Hanford, which comprise the last, large tracts of shrub-steppe habitat remaining in Washington State. The HRA should strive to connect important habitats rather than fragment them. Part of the McGee Ranch should be considered as a possible site to obtain mineral resources (see below). ALE and part of the Wahluke Slope are already managed as wildlife refuges by USFWS. Wildlife Refuge designation for the Wahluke Slope and Wild & Scenic River designation for the Hanford Reach has been recommended in the Hanford Reach Final EIS, June, 1994, and in the associated Record of Decision. The islands contain both important wildlife habitat and irreplaceable cultural sites and require the highest level of management and protection.

- Issue a separate Record of Decision for the areas listed in the bullet above, because decisions about the future of these lands need not be delayed by debates over central Hanford land use issues.

- Restrict the Industrial (Exclusive) Area boundary to that shown in Alternatives 1 and 2.

The western extension in the Preferred Alternative contains valuable shrub-steppe habitat and should not be used for Hanford clean up operations.

- Replace Industrial Areas in the preferred alternative with those areas for which there is a documented need and which do not significantly impact wildlife habitat or further fragment these habitats.

The Industrial designation should include areas defined by the City of Richland in their Comprehensive Plan (except for the 300 Area, see below), the Energy Northwest site, and the FFTF. The 1100 area has already been given to the Port of Benton for industrial development. These locations are contiguous with currently developed areas in the southeast portion of the Hanford Site where utilities are available and land disturbance is greatest. These Industrial areas combine to provide over 3,500 acres of public land for industrial expansion in addition to the 11,350 acres for Industrial-Exclusive use of the 200 Areas, providing more than ample space for local economic development over the next 50 years. This is especially true considering the availability of other lands off of Hanford which are slated for development, such as Richland's Horn Rapids Industrial Park and other Port of Benton properties.

The amount of land designated Industrial in the Preferred Alternative and Alternative 3 is far more extensive than can be justified. The reserving by DOE of large blocks of land at May Junction and in the southeast corner of the site outside of the Richland UGA for unspecified, speculative future industrial uses is unacceptable. According to *Guidance Regarding NEPA Regulations*, 48 Fed. Reg. 34263 (1983) by A. Alan Hill, Chairman of the CEQ at that time, "NEPA has never been interpreted to require examination of purely conjectural possibilities whose implementation is deemed remote and speculative. Rather, the agency's duty is to consider 'alternatives as they exist and are likely to exist.'" These lands' existing value as wildlife habitat should be recognized and given the designation of either Preservation or, if it is shown that they contain mineral resources needed for clean up, Conservation Mining.

No industrial use should occur at May Junction in the Preferred Alternative and the area south of Energy Northwest in Alternative 1 because these areas fragment and lower the quality of important adjacent habitats. With time, the habitats in these areas and other areas in the southeast corner of the Site will be re-established and improve in wildlife value. In addition, areas near the river should be avoided for industrial development.

- Lands designated Research and Development should be limited to the 300 Area.

R&D areas have the same impacts as Industrial areas. New R&D activities should be located in the 300 Area or within Richland's UGA. LIGO should be designated a pre-existing nonconforming use and the lands it occupies should revert to Preservation when the LIGO mission is complete.

- High intensity recreational use should be restricted to an area for the museum at B Reactor. Low intensity recreation in the Vernita area should be limited to a boat launch at the Vernita Rest Stop on the south side of the river and upstream of the bridge.

DOE should encourage reasonable recreational use of the Hanford Reach and surrounding public lands, but recognize that developed recreation has similar environmental impacts as industrialized use of an area. High-intensity recreation should only occur at the B-Reacto, which should be a museum, and not extend to the river. Access to B-Reacto must be by existing roads only, avoiding disturbance to important riparian habitat along the river. The proposed improved boat ramp in the Vernita area should be developed as a low-

intensity recreational area at the existing Vernita Rest Stop (upriver of the bridge), thereby reducing riparian disturbance and utilizing existing developed resources. The low intensity recreation area downriver of the Vernita Bridge shown on the Preferred Alternative should be eliminated. The White Bluffs boat launch on the Benton County side should not be available for low intensity recreation. This area is important for Bald Eagle roosting and possible nesting. This launch should be closed when eagles are present and used at other times for emergencies, law enforcement, and research only. Any trail that is constructed should be located to avoid sensitive wildlife habitats, native plant communities, and cultural sites. Trails should be removed from the river's edge with occasional spurs to allow access to the river. Trails should be designated for non-motorized use only. No commercial development should be allowed in any low-intensity recreation area.

- Eliminate the possibility of agriculture, including grazing, on Hanford lands.

Lands designated Conservation Mining/Grazing should be changed to Conservation Mining. Grazing, or any agriculture, cannot be allowed on any Hanford lands since grazing increases fire danger and spreads noxious weeds. In addition, agricultural use of Hanford lands would put Washington State agricultural products at risk of extremely negative publicity. The U.S. Geological Survey, the Bureau of Reclamation, and Washington State University studies have shown that farming the Wahluke Slope would jeopardize the White Bluffs, which border the Hanford Reach, by causing landslides into salmon spawning sites.

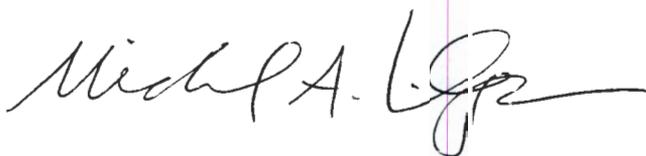
- Only those areas actually necessary for mining mineral materials in support Hanford cleanup should be designated Conservation/Mining (without grazing).

The objective of Conservation/Mining is to provide DOE mineral resources to complete cleanup activities while protecting valuable wildlife habitat. Therefore, mining must be restricted to only those activities and areas supporting Hanford's cleanup mission. Furthermore, DOE should conduct the appropriate and promised NEPA studies to determine site needs, specific location alternatives for obtaining the needed materials, the impacts of obtaining the materials, and mitigations following mining activities. All areas not needed for mineral resources should be designated Preservation. Those areas designated Conservation Mining should revert to Preservation as those lands are no longer needed for Hanford clean-up. No commercial mining should be allowed under any circumstances.

No mining should be allowed on ALE. One of the many values of ALE is the beautiful panoramic vista of Rattlesnake Mountain, one of the defining geologic formations in the Tri-Cities. A mine in front of Rattlesnake, easily visible from SR 240, will destroy the view shed of this distinctive landmark. Instead, the possibility of using a small portion of the McGee Ranch site to obtain the needed soils should be explored. This site should be used if adequate materials can be obtained while still maintaining the important migration corridor to the Yakima Training Center.

I urge DOE to continue to support preservation of the unique natural and cultural legacy found on the Hanford Site and the Hanford Reach of the Columbia River while providing for reasonable economic development of Hanford lands.

Sincerely,



Michael A. Lilga