



Nez Perce

0075806

ENVIRONMENTAL RESTORATION & WASTE MANAGEMENT
P.O. BOX 365 • LAPWAI, IDAHO 83540-0365 • (208) 843-7375 / FAX: 843-7378

June 3, 2006

Mr. Steve Burnum
U.S. DOE A3-04
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

RECEIVED
JAN 24 2008

EDMC

RE: *Review of Integrated Biological Control (HNF-11170) Rev 2*

Dear Mr. Burnum:

The Nez Perce Tribe's Environmental Restoration and Waste Management (ERWM) program has reviewed the Integrated Biological Control (HNF-11170) Rev. 2 document. Long-Term Stewardship is a key ERWM Hanford issue, where the invasion of noxious weeds at Hanford has become an area of concern. The ERWM monitors the condition of the land and attendant natural resources for future "tribal" use for gathering purposes. If the site is overrun by noxious weeds, this would preclude or limit "tribal" use once available. This problem requires a lot of work and persistence to eradicate many of the species and that many species are more resilient and invasive than first thought.

Since 1855, reserved treaty rights of the Nez Perce Tribe in the Mid-Columbia have been recognized and affirmed through a series of Federal and State actions. These actions protect Nez Perce rights to utilize their usual and accustomed resources and resource areas in the Hanford Reach of the Columbia River and elsewhere. Accordingly, the ERWM respond to actions that impact the Hanford ecosystem.

Below are comments related to your Integrated Biological Control operating manual. Most of our comments are minor with the exception of two areas 1) The Evaluation and Reporting section 5.4. The ERWM feels this is an area that needs significant improvement (see comments below), and 2) documentation of your responsibilities in restoring areas where herbicide spraying has actually created habitat conducive to invading weeds (comments below).

Specific Comments:

1. Section 2.2 refers to WAC code 16-750 which provides lists of noxious weeds and delineates monetary penalties for failure to control their spread. How does the state oversight of this system actually work? Does the state send representatives to the site to monitor weed control

RECEIVED

JUN 19 2006

DOE-RL/RLCC

activities? If so, how do they determine if you are failing to control the spread of a given species?

2. Section 3.6 mentions a Hanford Biological Control Information Forum which meets every two-four months. This meeting would be a good method to keep interested parties aware of biological weed control activities at Hanford. Many organizations including tribes are mentioned as attendees. To our knowledge the ERWM has never been informed of this meeting or been invited. In fact upon further investigation it appears that this meeting has not been held for a few years. The ERWM suggests that the meeting be held as stipulated in this section and that tribes and other stakeholders be invited to attend.

3. Section 4.2 (Surveys and Mapping) indicates that no GIS information related specifically to biological control activities or biological contamination events exists even though the technology is available. ERWM recommends that a GIS mapping system be implemented so that future personnel will have a record and a map of control activities.

4. Section 5.3 has a large section on monitoring techniques and says that monitoring is done by the use of belt transects, line intercept, or density measurements in order to quantify information. ERWM staff has reason to believe that this is not happening or has ever happened. Therefore, ERWM questions the usefulness of this section. These monitoring protocols need to be implemented and documented, or this section needs to be deleted. Results of these efforts would then be documented in your annual report. In regards to this it would be very useful to report how a given population of weeds has been reduced by a given percent after applying a biological control or other method.

The Nez Perce Tribe has an active biological control program with a full scale monitoring program with control plots that allows them to quantify the effectiveness of a given treatment. They would be happy to consult with you on how to establish a viable monitoring program.

5. During a recent meeting, the DOE indicated that revegetation activities were going to take place along the roadways in the 100 Area, where helicopter spraying activities in the past have been very aggressive. IBC should include a section where responsibilities for restoration are delineated when herbicide activities have actually created more habitats for weed invasions. These restoration activities should then be reported in an annual report. ERWM staff has yet to see any communication from the noxious weed staff on how these restoration efforts are proceeding. It has been almost three years since our original discussion on this issue, and it is still unclear to ERWM whether or not restoration of disturbed habitat has occurred.

6. Section 5.4. ERWM staff question whether or not many of the points mentioned in this section are happening. For instance does IBC routinely monitor new and/or existing borrow pits for weeds? Does IBC monitor wildlife transportation corridors? Are baseline conditions through initial inventories identified and documented? This section talks about monitoring populations before and after treatment. Monitoring to most people would indicate quantifiable data that could be used to plot trends and population densities over time. ERWM staff is not aware of any such data. If these activities are conducted as needed the ERWM would expect to see this reported in the annual report.

Annual Weed Reports

One of the main concerns ERWM has with the weed control program at Hanford is the lack of quantifiable and detailed information that is provided in what the ERWM has seen in annual noxious weed reports. Many individuals that ERWM staff has talked to about weed issues are unaware of how the noxious weed program reports its activities and status. The only documentation ERWM staff are aware of is the few pages that are buried in the Hanford Site Environmental Report that tends to be general in nature and does not include many of the reporting requirements mentioned in section 5.4.

The ERWM suggests that IBC provide a stand alone annual report with photos, dates, maps, control activities, biological controls, monitoring results, restoration activities, and other pertinent information. This report would provide details of restoration or revegetating activities conducted by the weed control program. Thus, the report would provide needed visibility to the noxious weed program that many people are unaware of. The report could then be sent to a list of Hanford personnel, stakeholders, and tribes. In the long-term this effort would be especially valuable to Hanford personnel, as new employees would have something they can look at to see the progress and details of the program.

One report at Hanford that does this is an annual revegetation and restoration report written by Bechtel/Washington Group that provides information on population densities, monitoring activities, impacts, etc. This report contains up-to-date photos and provides a good overview of the status of many sites that have been revegetated over the past few years. This has been a very useful document and has brought a lot of favorable feedback to that program. The ERWM suggests that the weed control annual report follow a similar format.

The ERWM appreciates your efforts to preserve and protect Hanford's natural resources which in turn help protect Nez Perce treaty rights at the site. Please contact Dan Landeen (208) 843-7300 ext. 2422, of my staff if you have any questions.

Sincerely,



Gabriel Bohnee
ERWM Director

Cc: Aaron Miles, Natural Resources
Brooklyn Baptiste, NPTEC
Kevin Clarke, DOE
Dana Ward, DOE
Steve Wisness, DOE
Ray Johnson, Fluor
Richard Roos, Fluor
Joe Caudill, Fluor