



State of Washington

DEPARTMENT OF FISH AND WILDLIFE

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August 30, 1996

James Rasmussen
Director, Environmental Assurance, Permits and Policy
U.S. Department of Energy
Mail Stop A7-15
P.O. Box 550
Richland, Washington 99352

Dear Mr. Rasmussen:

In January 1996, the Hanford Natural Resource Trustee Council (NRTC) sent a letter to Mr. John Wagoner, urging, in part, that U.S. Department of Energy (USDOE) finalize and implement the Biological Resource Management Plan (BRMP) and the Biological Resource Mitigation Strategy (BRMS). Washington Department of Fish and Wildlife is concerned that those documents still have not been published, that they have no budget support after September of this year, that we have not been given an opportunity to review current drafts in the intervening months, and that USDOE has never responded to that NRTC letter.

We see BRMP and BRMS as critical documents for carrying out trust responsibility at the Hanford Site. Currently, mitigation action plans for the 240 Access Road, Environmental Restoration Disposal Facility and the Solid Waste Retrieval Complex defer detailed planning and implementation to BRMS. Every year mitigation for these projects is delayed because BRMP and BRMS are not finalized is another year of lost natural resource services which must be compensated; the cost of mitigation is rising because of this delay. Moreover, natural resource impacts are not necessarily static in the absence of mitigation. For example, invasion of disturbed areas by weeds would typically interfere with the success, and potentially raise the cost, of revegetation.

Just as importantly, we expect that publication and implementation of BRMP and BRMS would be very helpful for USDOE in carrying out stewardship responsibility for future projects. The documents would provide timely perspective for development of the Comprehensive Land Use Plan. In designing the scope and location of remediation actions, incorporation of mitigation sequencing and planning at an early stage should reduce overall project costs. As a more general benefit, having BRMP and BRMS in place would allow

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siting of mitigation banks and specific mitigation projects while options are still open. We expect these options to be increasingly foreclosed in the future.

Please let us know if there is any way we can help you expedite finalizing and implementing BRMP and BRMS.

Sincerely,



Martin Baker
Assistant Director
Habitat Program

cc: Hanford Natural Resource Trustees

Michael Farrow, Confederated Tribes of the Umatilla Reservation
Chris Burford, Confederated Tribes of the Umatilla Reservation
Ann Aldrich, U.S. Bureau of Land Management
Jake Jakobosky, U.S. Bureau of Land Management
Preston Sleeper, U.S. Department of Interior
Philip Laumeyer, U.S. Fish and Wildlife Service
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