

9613457.2837  
**START**



0044961  
034938

State of Washington  
**DEPARTMENT OF FISH AND WILDLIFE**

1701 S. 24th Ave., Yakima, WA 98902-5720 Tel. (509) 575-2740  
c/o Department of Ecology  
1315 W 4th Ave, Kennewick, WA 99336

29 July, 1996

Robert McLeod  
U.S. Department of Energy  
P.O. Box 550 MS: H0-12  
Richland, WA 99352



Dear Mr. McLeod:

Re: Comments on the 90% draft mitigation plan for the 300-FF-1 operable unit.

Washington Department of Fish and Wildlife (WDFW) appreciates the opportunity to provide comments on the aforementioned document. Our interests include the sustainability of natural resources on the Hanford Site. This interest is captured in U.S. Department of Energy's Land and Facility Use Policy.

We appreciated the opportunity to provide comments at the 60% design level. However several comments made in our 17 June, 1996 letter to you still have not been addressed. These include protection of the mitigation site, establishment of performance criteria, funding for maintenance and monitoring, and an annual report. In addition, WDFW has received U.S. Fish and Wildlife's comments regarding this project, and concurs with the issue regarding off-site replacement for habitat removed to construct the ponds, trenches and landfills. We would like a meeting to further discuss this issue.

### Specific Comments

**Section 3.2, 4th bullet.** If a need arises to take fill from an existing borrow site, the impacts at the borrow site from this project should be mitigated. The mitigation plan does not address this issue.

**Section 3.2, 6th bullet, second paragraph, last sentence.** An annual report should be prepared instead of at the end of the five year monitoring period. Decisions may be needed on whether a contingency plan needs implemented sooner than at the end of the monitoring period.

Mr. McLeod  
29 July, 1996  
Page 2 of 2

Who will receive a copy of these reports?

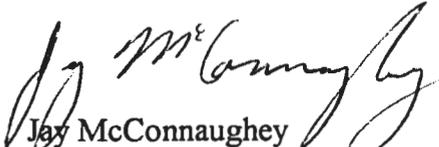
**Section 3.3.** WDFW disagrees with the objective stated in this section. The 618-4 area should be restore to equivalent existing habitat value conditions. The objective is not site stabilization for this area.

**Section 3.3.3, 618-4 burial ground, fourth sentence.** This discusses an interim action. What qualifies whether a natural reclamation has occurred. What determines success?

WDFW still does not see the level of detail needed in this document which will ensure successful mitigation/restoration. We would like to meet to discuss this plan, and ask USDOE to invite the other natural resource trustees as well.

Thanks for the opportunity to comment. If you have any questions before meeting, please contact me at (509) 736-3095. I would appreciate a call before the 6th of August to set a date for meeting.

Sincerely,



Jay McConnaughey  
Habitat Biologist, Hanford Site

jlm

cc:  
Liz Block, USFWS  
Washington Department of Ecology  
Ron Skinnarland  
Geoff Tallent  
Ted Wooley  
Brent Renfrow, WDFW