

Pacific Northwest National Laboratory

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Thomas W. Ferns
HRA-EIS Document Manager
U.S. Department of Energy
Richland Operations Office
P.O. Box 550, MSIN H0-12
Richland, WA 99352

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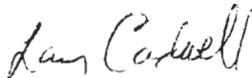
DOE-RL / DIS

Dear Mr. Ferns:

Please find attached several comments regarding DOE/EIS-0222D. The comments primarily address apparent inaccuracies in some of the biological resource data. The inaccurate information, if used for planning purposes, has the potential to result in harmful impacts to some of Hanford's biological resources.

I hope that you are able to use these comments in the revision of the document to support decisions on future Hanford land uses. If you have questions regarding these comments or any other issues regarding the current status of Hanford's biological resources, please do not hesitate to contact me.

Sincerely,



Larry Cadwell
Manager, Ecosystems Monitoring Project
Ecology Group

:tlb

attachment

cc: File/LB



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Page 3-6. The Preservation description includes the potential for two management options that are counter to the intent of biological resource preservation. Neither grazing nor fire (presumed to mean controlled burning) have been demonstrated to be effective as a benefit or aid in preserving the native biological resources (plants, animals, microbiotic crusts) of the eastern Washington shrub-steppe. In fact, the opposite is true. Overgrazing and wildfires that remove native plant cover have resulted in degradation of biotic integrity, loss of biodiversity, and an increase in both alien and noxious weeds in the shrub-steppe. Reference to the use of fire and grazing should be removed from the Preservation definition.

Figure 3-3 (and the premise of DOE's preferred alternative) fails to recognize the sensitive nature of much of the area proposed as "Conservation (Mining & Grazing)". The majority of the land area having this designation within the area commonly referred to as "Central Hanford" and bounded by the Columbia River, Highway 240, and Horn Road contain numerous high quality habitats (level III and level IV habitats – see Figure 4-27), rare plants, and element occurrences. As such the area is very clearly NOT suited for grazing (See BRMaP, 1996, section 7.5) without being subject to significant environmental damage.

Figure 4-17 lacks metadata and thus can not be interpreted in a manor that leads to "correct" or reasonable conclusions regarding the amounts, numbers, locations or relevant reference time frame. Specific examples include:

- the mapped bald eagle nest sites show some historic nest site, but do not represent either current or even recent bald eagle nest locations (if one uses the BHI reference date at the bottom, the conclusions might be that the information on the map was current as of 07/06/98. That assumption would be incorrect.
- the "ferruginous hawk nest sites" shown on the map are actually historic nest locations, not current or even representative of any recent year. The logical conclusion is that there are about 20 plus active nest sites on Hanford, when in fact the number of active nests is less than half that number. If the intent is to show historic nest sites, they should be identified as such.
- the above comment for ferruginous hawk nest sites also applies to sage sparrow, burrowing owls, and loggerhead shrike, but an important additional interpretation problem also exists for these species. The siting data for these three species were from incidental sightings, not from thorough surveys. Therefore the map user should be cautioned to not infer that areas with no record sighting are devoid of the species in question. Many of these data were obtained from driving (road) surveys as is evident from the pattern on the maps. Thus, if the map were to be used to locate areas devoid of these species, erroneous conclusions would likely result. For example, the block of habitat directly south of the 200 east and west areas contains high quality (Level III, see Figure 4-27) habitats and is some of the Hanford Site's best sage sparrow and loggerhead

shrike habitat. Since the Site has never been surveyed for these species, they frequently do not show up on the map and many locations where they are most likely to occur. Thus, a casual map user might very well conclude that these areas are devoid of these species, when the opposite is most likely to be true.

Figure 4-18 contains several biological resource map areas that can not be substantiated by data and therefore appear to be technically indefensible. Most if not all of the great blue heron occurrence locations are in error. Technical data do not exist to support the "map" locations for several of the species depicted on the map. There are (in existence) data that could be used to create "improved" versions of these maps, but they appear to not have been used.