



June 8, 1999

Mr. Thomas Ferns
U.S. Department of Energy
Richland Operations Office
P.O. Box 550, MSIN HQ-12
Richland, Washington 99352

RECEIVED

JUN 11 1999
DOE-RL/DIS

Re: The Hanford Remedial Draft Environmental Impact Statement

Dear Mr. Ferns:

The National Audubon Society would like to offer comments on the U. S. Department of Energy's draft Hanford Remedial Action Environmental Impact Statement and Comprehensive Land-Use Plan.

The National Audubon Society has over 550,000 members and 500 local chapters throughout the United States. We have dedicated ourselves to the preservation of birds and wildlife habitat for over a century. Audubon has supported protection of Hanford's incredible fish and wildlife resources for thirty years. I had the pleasure of touring the Hanford Reach shortly after I became the Society's president and have followed this issue with keen interest ever since.

We congratulate the Department of Energy for the high quality of research and professionalism demonstrated in the preparation of the HRA-EIS. We view public comment and involvement as essential elements in all public policy decisions and your efforts to reach out to the public are admirable.

We support the preferred alternative designating the Hanford Reach, its islands, the Wahluke Slope, McGee Ranch, and Arid Lands Ecology Reserve for preservation. The Riverlands area between the McGee Ranch and the Hanford Reach must also be designated as preservation areas to tie all these areas together, enabling them to function as an ecosystem. We strongly recommend expanding the U.S. Fish and Wildlife Service's Saddle Mountain National Wildlife Refuge to include all these areas. We thank the Department of Energy for saving this habitat for fifty years, but Hanford's fish and wildlife need the stewardship only the U.S. Fish and Wildlife Service can provide.

We also support the preferred alternative designating Gable Mountain, Gable Butte and the Sand Dunes for preservation. Unfortunately preservation under the preferred alternative does not go far enough. An immense expanse of the Hanford Reservation harbors high quality wildlife habitat and native plant communities and must be protected.

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Most of Washington's shrub-steppe habitat is gone or so badly fragmented that it is of little use to wildlife. We support Alternative One's designation of areas set aside for preservation. Alternative One preserves and connects the Washington Department of Fish and Wildlife's Priority Species locations displayed on Figure 4-17 and Levels II, III and IV biological Resources displayed on Figure 4-27. Setting aside these areas for preservation prevents fragmenting habitat and allows all these areas to function as an ecosystem. Alternative One leaves sufficient resources and acreage to provide for industrial and economic development, scientific research and completion of clean up operations.

We are opposed to opening any portion of the Hanford Reservation to grazing. Instead, we recommend the use of carefully managed fires to reduce fuels buildup and prevent wildfires which are so destructive to sagebrush.

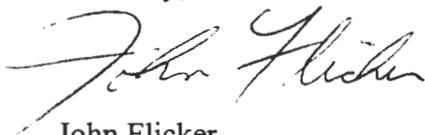
We realize some mining will be necessary to complete your clean-up operations. We strongly recommend limiting mining to only that which is necessary to complete clean up. All mining should receive NEPA review and mines must be restored to native habitat when closed. The ALE contains some of Hanford's best habitat and most spectacular scenery and should not be mined.

Hanford is a recreational treasure and should be protect for all Americans to enjoy. We support "Low Intensity" recreation but oppose "High Intensity" recreation on the Hanford Reservation with the exception of the proposed B-Reactor historical museum. "High Intensity" recreation as defined in your EIS could easily open the fragile Hanford Reach to destructive and inappropriate activities such as destination resorts and golf courses. We can build "High Intensity" recreational facilities virtually anywhere. We can not replicate the Hanford Reach or the ALE.

The HRA-EIS addresses many difficult and complex issues, which could take months or years to resolve. The issues facing the Hanford Reach, Wahluke Slope, Riverlands, McGee Ranch and ALE are relatively simple, and sufficient information is available to make the right decision now. We recommend that a separate Record of Decision for these areas be issued by the Secretary of Energy by the end of this calendar year.

Thank you for this opportunity to comment of these important matters.

Sincerely,



John Flicker
President