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DEPARTMENT OF FISH AND WILDLIFE

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c/o Department of Ecology  
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18 May, 1998

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



RECEIVED  
MAY 20 1998  
DOE-RL / DIS

Dear Mr. Ferns:

RE: Comments on the *Revised Draft Hanford Remedial Action Environmental Impact Statement and Comprehensive Land Use Plan*, Internal Review Process.

Washington Department of Fish and Wildlife (WDFW) appreciates the opportunity to provide comments on the revised aforementioned document that is in the process of internal review. We are hopeful that our concerns will be addressed in the National Environmental Policy Act (NEPA) process. At this time, we would like to reiterate several concerns.

The first is the protection and preservation of the McGee Ranch (as defined in a letter dated April 5, 1996 from Martin Baker, Assistant Director of the Habitat Management Program, to John Wagoner, Manager, USDOE). We defined McGee Ranch as that portion of U.S. Department of Energy's property north and west of Highway 24 and south of the Columbia River. The preferred map still needs modification to capture this important landscape feature.

Another concern is the identification of borrow sites for the closure of waste sites on the Central Plateau. This is a significant issue that needs to be addressed since USDOE is approaching closure of the first two cells of the Environmental Remedial Disposal Facility in 1999. Statements made in our comment letter dated December 9, 1996 on the *draft Hanford Remedial Action Environmental Impact Statement and Comprehensive Land Use Plan* (HRA EIS & CLUP) remain applicable to the revised draft document. WDFW strongly encourages USDOE to commit to NEPA analysis for this issue, and we look forward to being involved in the resolution of this issue as stated in the USDOE response to our 5 April, 1996 letter.

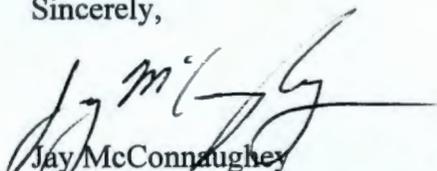
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Another major concern with the document is the lack of implementing procedures. These are critical for the success of the action. WDFW is unable to "identify changes necessary to align documents and associated policies and procedures with the provisions of the CLUP" (page 6-4, lines 48 and 49) since the procedures are not attached. Table 6-3 illustrates this point with a comparison to an existing county process. For example, as Benton County moves through their comprehensive land use planning process, the public has had the opportunity to provide comments on the map, policies, and ordinances. These ordinances enforce the map and policies. A public review of the three planning components ensures what's reflected in the map and policies is in the ordinances and vice versa. The equivalence of the County ordinances needs to be an appendix in the HRA EIS & CLUP. Otherwise, the public is not presented information to decide whether significant actions are being taken, such as, that stated on page 6-4, lines 7 and 8. Is this statement referencing USDOEs property bounded by route 4S and route 10 as called out in the Biological Resource Management Plan? Although WDFW believes it is, we are concerned that the public would not understand what the exemption clause is referencing? We understand the action is short on funds, but we believe a public review process is necessary for the implementing procedures. USDOE should commit to a supplemental statement or tier process to ensure an adequate review by the public.

We appreciate the opportunity to affect the contents of the document to ensure the public has the information necessary to make informed decisions. If you have any questions regarding these comments, please contact me on (509) 736-3095.

Sincerely,



Jay McConaughy  
Habitat Biologist, Hanford Site

cc:

Ted Clausing, WDFW