



June 4, 1999

Mr. Keith Klein, Manager
U.S. Department of Energy, Richland Operations
P.O. Box 550 (A7-50)
Richland, WA 99352

Subject: HRA-EIS/CLUP

Dear Mr. Klein:

A draft Hanford Remedial Action Environmental Impact Statement (HRA-EIS) and Comprehensive Land Use Plan (CLUP) was issued in September 1996. Extensive and generally critical public comments were made during the review period. The Hanford Advisory Board did not submit formal advice, but agreed that this initial draft needed extensive revisions.

ADVICE

The Hanford Advisory Board is pleased that the U.S. Department of Energy (DOE) and the cooperating agencies and tribes have produced a thoughtful and comprehensive study of potential land uses for the Hanford Site which fairly considers its many important values and resources. We appreciate DOE's responsiveness to comments on the initial draft.

The Hanford Advisory Board has not attempted to reach consensus on the alternatives considered in the HRA-EIS/CLUP, in recognition of the diversity of opinion on this subject among Board members. The Board also has not had sufficient time to fully develop comments on the Environmental Consequences and Plan Implementation sections. However, we submit the following initial advice in the event that the public comment period is not extended:

1. The Board supports the proposed name change of the document to "Hanford Comprehensive Land Use Plan."
2. The Board supports DOE's removal of remedial actions from the scope of the EIS.
3. The Comprehensive Land Use Plan should be based on the Cultural Resources Management Plan, the Hanford Site Biological Resources Management Plan, and the Hanford Site Biological Resources Implementation Strategy. These plans provide guidance and direction in accordance with DOE Orders.
4. The Conservation/Mining area designation must be implemented so as to protect areas of high quality habitat of various types, particularly the high quality shrub-steppe sagebrush.
5. Areas where the river or creeks have historically flowed at Hanford are likely to have tribal use areas. Uses or activities which would physically disturb or potentially contaminate such areas should require detailed tribal review and field study for cultural sites prior to new development.

The following Board members and alternates abstained from this advice out of concern that it may negate (1) treaty rights of the tribes and (2) their organizational endorsement of a particular alternative:

Nanci Peters, Yakama Indian Nation
Betty Tabbutt, League of Women Voters
Tim Takaro, University of Washington
Paige Knight, Hanford Watch of Oregon
Gerald Pollet, Heart of America Northwest
Dick Belsey, Physicians for Social Responsibility

We look forward to your response and to periodic progress updates on this matter.

Very truly yours,

Merilyn B. Reeves, Chair
Hanford Advisory Board

cc: Tom Fitzsimmons, Director
Chuck Clarke, Regional Administrator
James Owendoff, Department of Energy
Headquarters
Paul Kruger, Deputy Designated Federal
Official The Oregon and Washington
Congressional Delegations
Michael Gearheard, Environmental
Protection Agency
Dan Silver, Washington Department of
Ecology

This advice represents HAB consensus for this specific topic. It should not be taken out of context to extrapolate Board agreement on other subject matters.

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*For questions or comments, please send [email](mailto:Hanford_Advisory_Board@rl.gov) to Hanford_Advisory_Board@rl.gov
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