

Table J-2. DOE responses to comments on Draft EIS (continued)

Comment number	Comments	Responses
BD-2	<p>alternative would provide the best long-term advantage from a cost standpoint, as well as providing significant reductions in impingement and entrainment. However, the habitat effects of each alternative should be carefully assessed before the proposed action is finalized.</p> <p><u>Alternatives</u></p> <p>We believe the proposal described in the draft statement offers significant benefits to fish and wildlife resources when compared to the existing No-Action condition. However, the final statement would be improved by the inclusion of a detailed long-term analysis of initial and operating costs, environmental effects, and production efficiency over the project lifetime for each alternative.</p> <p>The projected lifetime of the currently operating reactor systems or the likelihood of reactor replacement and long-term need for cooling systems should be factored into the analysis because the available information indicates that significant long-term differences in effects to fish and wildlife resources may exist between action alternatives, particularly in reference to the C- and K-Reactor action alternatives. We suggest long-term annual operating costs may favor the recirculating cooling tower systems after approximately 9-10 years of operation even though the once-through cooling tower systems may represent a lower initial cost.</p> <p><u>Impacts to Wetlands</u></p>	<p>Initial and operating expenses, along with production efficiency, have been included in Chapter 2 of this FEIS. Environmental effects for construction and operation have been analyzed extensively and results are included in Chapter 4 of this FEIS.</p> <p>Also see responses to comments BD-1 and BC-6.</p> <p>Comment noted on preference for recirculating cooling towers. See discussion in Chapters 2 and 4 for more detail on this alternative.</p>
BD-3	<p>Currently, annual forested wetland canopy losses of about 54 acres are occurring in response to thermal impact and increased flooding in the affected areas. The once-through cooling tower alternative</p>	<p>See response to comment BC-19.</p>

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	<p>would decrease forest canopy loss while allowing some revegetation of thermally impacted wetlands. Approximately 1,500 acres of previously forested wetlands would continue to be maintained in a permanently flooded condition by the discharges of C- and K-Reactors. With termination of thermal effects, these flooded areas would be expected to provide habitat for aquatic fish and wildlife species if discharge fluctuations are not too severe. The recirculating tower alternative would result in termination of both thermal and flooding effects due to C- and K-Reactor operations. This alternative would allow for successional revegetation of approximately 1,500 acres of previously forested wetland habitats.</p>	
BD-4	<p>The Habitat Evaluation Procedures (HEP) analysis being conducted for the Department of Energy by the Savannah River Laboratory will provide the best way to adequately compare alternatives with respect to long-term habitat effects.</p>	See response to comment BC-3.
	<p><u>Cumulative Impacts</u></p>	
BD-5	<p>The final statement for the L-Reactor Restart Project (ER 83/1211) states that on a cumulative basis, including all Savannah River Plant water intakes, the total entrainment losses would be up to 19 percent of the fish eggs and larvae passing the intake canal annually. The final statement should address the combined effects of D-Area, C-, K-, and L-Reactor operation on impingement and entrainment. The total losses from all intakes is significant. Consideration should be given to the installation of recirculating towers to reduce cumulative impacts from entrainment losses.</p>	<p>Entrainment and impingement impacts have been addressed in Chapter 4 with supportive information provided in Appendix C of the FEIS.</p>

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	We hope these comments will be helpful to you.	Sincerely, Bruce Blanchard, Director Environmental Project Review