

United States Environmental Protection Agency, Region 4
Atlanta, GA
Page 3 of 4

EPA Review and Comments on
Draft Site-Wide Environmental Impact Statement for the
Oak Ridge Y-12 Plant

Endangered Species: Page 4-51 notes the possibility that federally threatened or endangered species may be present in the vicinity of the Y-12 SWEIS impact area. We appreciate DOE's attention to this matter, and note that EPA principally defers to the U.S. Fish and Wildlife Service (FWS) regarding endangered species assessments. EPA encourages DOE to continue coordination with the FWS as appropriate.

1/06
1/06

Cultural Resources and Historic Preservation: We appreciate the detailed discussion of historic and cultural resource issues as related to the proposed project. Measures to minimize and/or avoid adverse impacts are listed in section 5.10.6 of the DSWEIS. The document mentions that specific procedures will be followed upon discovery of Native American cultural items during ground-disturbing activities. However, there is no information in the text of the DSWEIS regarding whether the DOE has consulted with concerned Native American tribes during the scoping process regarding cultural and archeological issues. Please clarify this in the Final SWEIS.

2/11
2/11

Environmental Justice (EJ): Section 3.5.13 and Section 5.13: We appreciate the consideration of Environmental Justice (EJ) issues in the DSWEIS. However, more detail and data are needed to support the conclusion stated in the document; i.e., DOE's statement none of the action alternatives would result in impacts to EJ populations.

The statement is made that prevailing wind patterns are not in the direction of EJ populations, but there is no map to clearly show which direction wind flows in relation to human populations. The wind direction maps in Section 4.7 do not show the location of human receptors. The Final SWEIS should present more detail to substantiate the EJ conclusions which are stated.

3/13

Regardless of the makeup of the affected population, impacts of the project should be controlled so that significant effects on human health are avoided and/or minimized.

Wetland Impacts: Page 4-50: The text states that emergent wetlands are present in the Y-12 area, in a location which receives effluent from NPDES outfall. Locations of other wetlands in the surrounding area, classified as palustrine and scrub/shrub, are also described in the document. The document also notes that some of the wetlands would be potentially impacted from construction under one of the alternatives.

Effort should be made to avoid destroying wetlands, especially those of higher quality, and preserve drainage ways that provide habitat and travel corridors for wildlife. A draft mitigation plan to compensate for predicted wetland losses should be developed during the NEPA process. Feasible alternatives that avoid wetland impacts should be consistent with the 404(b)(1) guidelines of the Clean Water Act.

The proposed project should include detailed plans to offset unavoidable wetland losses to the extent possible. Compensation site(s) should be located and described, and details regarding enhancement or creation techniques to be used at the sites should be included. The site layout should be designed to avoid or minimize direct and indirect impacts to wetland water quantity and quality. For example, parking lots or access roads could block existing drainage ways that supply water to wetland areas, potentially altering wetland hydrology.

4/06

Comment No. 1

Issue Code: 06

DOE has consulted with state and Federal wildlife resource agencies, including the U.S. Fish and Wildlife Service, regarding threatened, endangered, or special status species in the vicinity of the Y-12 National Security Complex (see Appendix C). DOE will continue to correspond and coordinate with these agencies prior to site preparation or construction activities.

Comment No. 2

Issue Code: 11

Section 4.10.1 in Volume I indicates that most of the Cherokee present in the Oak Ridge area were relocated to Oklahoma Territory in 1838. As a result, there are no recognized Native American Tribes in the Oak Ridge area. Formal consultations were not conducted, but the closest Native American Tribes, located in North Carolina, were contacted but expressed no interest in the project.

Comment No. 3

Issue Code: 13

The statement regarding wind patterns has been deleted. Data supporting the conclusions from area air monitoring stations have been added in Volume I, Sections 3.5.1.3 and 5.13. Additional data on human health impacts have been added to show that impacts in the Scarboro Community are not disproportionately high or adverse.

Comment No. 4

Issue Code: 06

Mitigation of potential impacts to biotic resources including wetlands are discussed in Volume I, Section 5.6.6 of the SWEIS. Specific measures would be incorporated in the final project design to avoid or minimize potential impacts to wetlands. The proposed new construction projects have not progressed to the phase where wetland specific impacts or design measures can be identified. A Mitigation Action Plan (MAP) would be developed if the facility final design, siting, and/or construction and operation would potentially impact wetlands.

United States Environmental Protection Agency, Region 4
Atlanta, GA
Page 4 of 4

Noise: EPA appreciates the discussion of noise impacts contained in the DSWEIS. Generally, EPA considers all increases over 10 dBA at any given noise level as a significant increase. We appreciate your mention in the DSWEIS that EPA has a *target* noise level (not a guideline or standard) of 55 dBA DNL for outdoor areas where people spend a varying amount of time (such as residences).

5/09

Comment No. 5
Comment noted.

Issue Code: 09