

December 17, 2001

Marianne Heiskell
Department of Energy
P.O. Box 2001
Oak Ridge, TN 37831

Pat Parr
Area Manager
Oak Ridge National Laboratory
P.O. Box 2008
Oak Ridge, TN 37831-6038

Dear Ms. Heiskell and Ms. Parr:

We are writing to you because of our concern that neither DOE Oak Ridge Operations, nor the Oak Ridge Reservation Land Use Planning Group, will, under the current plans for data collection and analysis, have sufficient information concerning the conservation and cultural values of these lands. We feel that the needs for additional information and analysis that we have outlined below are essential (1) any discussion of sensible land use decisions and (2) to any land use plans that are developed in the future.

The U.S. Department of Energy/Oak Ridge Operations (DOE/ORO) acknowledges that, as a result of its relative insulation from surrounding land use changes, the Oak Ridge Reservation (ORR) supports plant and animal communities whose biological diversity, within the Tennessee Ridge and Valley ecoregion, is comparable to that of the Great Smoky Mountains National Park for the southern Appalachian mountains. While DOE/ORO has established a management goal of conserving and protecting the biological diversity supported by the publicly owned lands on the ORR, there is no apparent strategy for achieving this goal. Likewise, DOE/ORO has yet to define conservation of biological diversity at the functional community level. This definition, based on community ecological function, is essential for preparation of a conservation strategy, which in turn is essential for reaching DOE/ORO's stated conservation goal.

Further, true land use planning includes all resources, especially those that are sensitive in both the natural and the built environment. Sensitive resources in the built environment, as well as those in the natural environment, need to be evaluated and considered in planning activity. Cultural resources are especially important in the planning process because they are of great interest to the public and are irreplaceable. In order for the ORR Comprehensive Land Use Planning effort to move forward, DOE/ORO should provide the Focus Group, and those within DOE constructing the draft plan, with the following information and evaluation capabilities.

- I. Establishment of Conservation and Cultural Preservation Goals
 1. Define DOE/ORO conservation goals
 2. Define DOE/ORO historic and cultural preservation goals
 3. Define conservation of biological diversity at the functional community level.
 4. Define DOE's strategies for achieving conservation goals.

II Preparation of a biological diversity conservation model. (The following information should be provided for all west end lands, including ED-1 at the Boeing property.)

1. Provide a quantitative assessment of existing habitats by type (i.e. mixed hardwood forest, bottomland hardwood forest, open meadows, etc.)
2. Provide a qualitative inventory of existing plants and animals associated with each habitat.
3. Quantify existing impervious surfaces according to type (i.e. roads, roofs, parking lots).
4. Model habitat, wildlife resources and bio-diversity losses and/or gains for each proposal that includes any changes in land use.
5. Quantify and qualify the primary cumulative impact of proposals that include any changes in land use.
6. Quantify and qualify secondary cumulative impacts on species specified as threatened or "in need of management" by federal or state government or by the "Partners in Flight" program, impacts including habitat loss

and fragmentation, invasive species opportunity, and peripheral impacts, such as pesticide and fertilizer use, hard surface runoff, and domestic animals, of each proposed land use change.

Sincerely,



U.S. Fish & Wildlife Service

J. Dever, Jr., J.

AFORR



TWRA

Mary Anne

The Conservation League

for Scott Davis

The Nature Conservancy

Lloyd E. Stokes

ORHPA/ DOR REPRESENTATIVE

CC: Leah Dever,
Manager, Oak Ridge Operations
Department of Energy

Wayne Tolbert
Science Applications International Corporation