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**EG&G ROCKY FLATS**

92 RF 541-1

EG&G ROCKY FLATS, INC  
ROCKY FLATS PLANT, P O BOX 464, GOLDEN COLORADO 80402-0464 • (303) 966-7000

DIST	LINE	INC
FRANK JAMIN A		
IAN HS		
BRANCH DB		
CARNIVAL GJ		
COPP RD		
DAVIS JG		
EVERED JE	X	
FERRERA DW		
GOODWIN R		
HANNI BJ		
HARMAN L K		
HEALY TJ		
HERRIG JG		
IDEKER E H		
KERSH J M	X	
KIRBY W A		
KUESTER A W		
KRIEG D		
LEE E M		
MAJESTIC J P		
MARY G E		
MCDONALD M M		
MORGAN R V	X	
POTTER G L	X	
PIZZUTO V M		
SANDLIN N B		
SWEDER B I		
SULLIVAN M T		
SWANSON E R		
TALLMAN K G		
WIEBE J S		
WILKINSON R R		
WILSON J M		
ZANE J O		
Fuller, P I	X	
Norta, S M	X	X
RE BK	X	
WOODS L	X	
FLORY RC	X	
HOBBS ED		
NCC FTES		
EG&M	X	
CORRES CONTROL	X	X

May 15, 1992

92-RF-5411

MAY 27 1992

erry A Vaeth  
anager  
OE, RFO

tn. J K. Hartman

**TE LADIES' TRESSES SURVEY REQUIREMENTS (5201) - JEE-0370-92**

response to your memo of May 7, 1992, we have reviewed the "Interim Survey requirements for *Spiranthes diluvialis*", as well as memoranda 92-RF-2629 and RF-92-4077, and have the following responses.

- **General:** EG&G, while recognizing that these are draft requirements that may be subject to modification, will comply with them to the fullest extent possible during any future *Spiranthes* survey work
- **Attachment 2, Part 2c:** To prevent unreasonable delays to IAG-driven remedial actions or other plant site projects, EG&G would like to see the requirements: (a) describe what constitutes due diligence and (b) place a limit on the number of surveys that must be performed to establish beyond reasonable doubt the absence of this species from a proposed project site
- **Attachment 2, Part 3:** Existing S.C.S, National Wetland Inventory, or 7.5' U.S.G.S quad maps may be at too large a scale to allow for precision mapping of small, discrete *Spiranthes* occurrences. For example, existing RFP wetland vegetation maps are drawn at a scale of 1" = 500', which is barely sufficient to resolve many of the small jurisdictional wetland areas in the buffer zone
- **Cover Letter, page 2, ¶5:** EG&G would like to note that the draft Habitat Mitigation Plan for Operable Unit 1 recognizes the need to protect this species from Front Range development impacts and contains provisions for creation of a *Spiranthes* refuge within the buffer zone.
- **92-RF-2629:** The Operable Unit 4 IM/IRA project site does not have a seasonally high water table which is the most consistent site feature for *Spiranthes*. Although neither the presence or absence of *Spiranthes* was ever demonstrated on the French Drain site, the draft Habitat Mitigation Plan for this project addresses, through creation of an onsite refuge, the potential loss of this species or its habitat. The SID project site may contain this species, but additional surveys (per the interim requirements) are planned in this area for August, 1992

**CLASSIFICATION**

UCNI	X
UNCLASSIFIED	X
CONFIDENTIAL	
SECRET	

AUTHORIZED CLASSIFIER  
SIGNATURE  
*[Signature]*  
5/15/92 JNM  
DATE

IN REPLY TO RFP CC NO  
2510-RF-92

ACTION ITEM STATUS  
 OPEN  CLOSED  
 PARTIAL

ORIG & DATE  
BRH/bnb  
5/15/92

**ADMIN RECORD**

U NU

BY	GTC	820
DATE	8-25-93	

T A Vaeth  
May 15, 1992  
92-RF-5411  
Page 2

- 92-RF-4077: EG&G will conduct August surveys (per the interim requirements) at the following locations proposed and alternate landfill site road crossings, base of B-1 dam; surface water stations SW50, SW51, SW52, SW57, SW58, and SW65; and monitoring stations GS05, GS07, and GS10. For other sites referenced in this letter, EG&G stands by the findings of the U S Fish and Wildlife specified expert, Dr Dave Bucker, of no suitable *Spiranthes* habitat.

If there are any questions or concerns, please contact Steve Nesta on X8605, or Richard Flory on X8680.



J. E. Evered, Director  
Environmental Management  
EG&G Rocky Flats, Inc

BKH.bmb

Ong and 1 cc - T A. Vaeth

cc.

F R. Lockhart - DOE, RFO  
R J Schassburger - DOE, RFO  
B. K. Thatcher - DOE, RFO