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CORP ES. CONTROL
OUTGOING LTR NO.

EG&G ROCKY FLATS

92 RFS 41 1

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

DIST.		
BENJAMIN, A.		
IAN, H.S.		
B. NICH, D.B.		
CARNIVAL, G.J.		
COPP, R.D.		
DAVIS, J.G.		
EVERED, J.E.	X	
FERRERA, D.W.	X	
GOODWIN, R.		
HANNI, B.J.		
HARMAN, L.K.		
HEALY, T.J.		
HERRIG, J.G.		
IDEKER, E.H.		
KERSH, J.M.	X	
KIRBY, W.A.		
KUESTER, A.W.		
KRIEG, D.		
LEE, E.M.		
MAJESTIC, J.P.		
MARX, G.F.		
MCDONALD, M.M.		
MORGAN, R.V.	X	
POTTER, G.L.	X	
PIZZUTO, V.M.		
SANDLIN, N.B.		
SCHIEDER, R.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
... BK	X	
WOODS, L.	X	
FLORY, R.C.	X	
HOBBS, F.D.		
NCC Files		
E&WM	X	
CORRES CONTROL	X	X

May 15, 1992

92-RF-5411

MAY 27 1992

erry A. Vaeth
anager
OE, RFO
trn: 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	X
UNCLASSIFIED	X	
CONFIDENTIAL		
SECRET		

AUTHORIZED CLASSIFIER SIGNATURE

[Signature]
DATE 5/15/92 JNU

IN REPLY TO RFP CC NO:

2510-RF-92

ACTION ITEM STATUS

OPEN CLOSED
 PARTIAL

ORIG & TRNSM: 5/15/92
BKH:bmb

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REVIEWED FOR INSPECTION
BY G. T. ... 820
DATE 8-25-93

T. A. Vaeth
May 15, 1992
92-RF-5411
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- 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

Orig. and 1 cc - T. A. Vaeth

cc:

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