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STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

Mail Stop PV-11 • Olympia, Washington 98504-8711 • (206) 459-6000

February 10, 1992

Eric Goller  
U.S.D.O.E.--Richland Operations Office  
P.O. Box 550  
Richland, WA 99352

**Re: Biological Assessments for Rare and Endangered Plant Species**

Dear Mr. Goller:

On receiving USDOE's request, dated JAN 15 1992, to review the draft *Biological Assessment for Rare and Endangered Plant Species Related to CERCLA Characterization Activities*, I sought the assistance of the Washington State Department of Natural Resources Natural Heritage Program. Since John Gammon did a fine review, I am simply attaching his comments. Please resolve all of his comments in the final draft.

Sincerely,

Steven F. Cross  
CERCLA Unit  
Nuclear and Mixed Waste Management Program

Enclosure

cc. Dave Jansen, Ecology  
Paul Day, EPA  
Steve Wisness, USDOE  
T. Veneziano, WHC





WASHINGTON STATE DEPARTMENT OF  
**Natural Resources**

FEB 10 1992

BRIAN BOYLE  
Commissioner of Public Lands

OLYMPIA, WA 98504

February 7, 1992

Steve Cross  
Department of Ecology  
MS: PV-11  
Olympia WA 98594-8711

Dear Mr. Cross:

Our program botanist, John Gamon, reviewed the draft *Biological Assessment for Rare and Endangered Plant Species Related to CERCLA Characterization Activities* prepared by Westinghouse Hanford. John's comments are presented below.

The document presents the relevant information in a complete and understandable format. Westinghouse Hanford should be commended for the concern expressed for the conservation of rare plants. A few minor comments are detailed below:

Page 2:

1. *Artemisia campestris ssp. borealis* var. *wormskioldii* grows so close to the river that characterizing it as an upland species is misleading.
2. We would not characterize *Astragalus columbianus* as "...relatively common on the Yakima Firing Range." To do so paints a potentially misleading picture. Even within the Firing Range it is not all that widespread.

Page 3:

1. We would characterize the habitat of *Nicotiana attenuata* as being (or at least including) gravelly washes.

Page 5:

1. The wording in the last paragraph is unclear. It seems to imply that plant populations are static, and that once an area has been inventoried it will never have to be inventoried again. Whereas plants do not move around as much, or as rapidly, as animals, they do (within limits) have the ability to colonize suitable habitats.

Page 6:

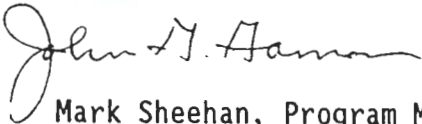
1. The occurrence of a rare plant within a highly disturbed area may be unlikely. However, if such a situation arose, particularly with a federal candidate or federally listed species, the site may well warrant

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Steve Cross  
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"protection." That is, special management should not be dismissed simply because the site had already been disturbed. It is conceivable that such a site could play an important role in the conservation of the species.

If you have any questions regarding our comments, please feel free to give me a call.

Sincerely,



Mark Sheehan, Program Manager  
Washington Natural Heritage Program  
Division of Land & Water Conservation  
PO Box 47047  
Olympia, WA 98504-7047  
(206) 753-2449

MS:st

cc: Dr. Michael Sackschewsky, Westinghouse Hanford

## CORRESPONDENCE DISTRIBUTION COVERSHEET

Author	Addressee	Correspondence No.
S. F. Cross, Ecology	E. Goller, RL	Incoming 9200567

Subject: BIOLOGICAL ASSESSMENTS FOR RARE AND ENDANGERED PLANT SPECIES

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