



REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
INSTALLATION MANAGEMENT COMMAND
HEADQUARTERS, UNITED STATES ARMY GARRISON
PICATINNY ARSENAL, NEW JERSEY 07806-5000

IMPI-PWE

01 February 2016

MEMORANDUM FOR U.S. Nuclear Regulatory Commission, Region I, Division of Nuclear Materials Safety, Attn: Ms. Laurie Kauffman, 2100 Renaissance Boulevard, Suite 100, King of Prussia, PA 19406-2713

SUBJECT: Endangered Species Review In Support of the Proposed Gorge Radiological Release Project

1. Area 1222, also known as "the Gorge", is presently considered potentially radiologically contaminated with Depleted Uranium. As stated in the Armament Research, Development and Engineering Center (ARDEC) SUB 348 source materials license renewal application dated 20 June 2011, limited research and development testing with depleted uranium containing items was conducted in this test area 40 to 45 years ago. A small amount of radium contamination, most likely a fragment of a luminescent gauge or dial, was also found in the area during a survey performed in 2001.

2. A work plan that describes the methods proposed for site remediation, and the performance of final status radiological surveys and sampling in accordance with the guideline set forth in the Multi Agency Radiation Survey and Site Investigation Manual (MARSSIM) has been submitted to the NRC. The objective of the MARSSIM final status survey and sampling in Area 1222 is for final radiological release in accordance with the unrestricted release criteria outlined in 10 CFR Part 20.1402.

3. As requested, our office has completed a review of the proposed plan with respect to natural resources, and although it is our opinion the proposed actions are not likely to adversely affect any listed species, Picatinny Arsenal has three (3) federally listed species and multiple state listed species which we feel should be addressed in the Environmental Assessment (EA) being prepared by the NRC.

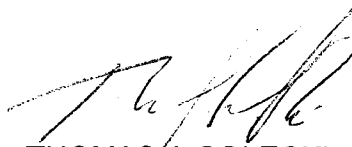
4. For Natural Resources related matters the EA should address:

a. **The Indiana Bat (IBAT – *Myotis sodalis*); Northern Long-eared Bat (NLEB - *Myotis septentrionalis*); and Bog Turtle (*Gyptemys muhlenbergii*).** Since there will be no impacts to any vegetation of any sort (no trees) there will be no impacts to the two listed bat species. The NLEB was recently listed as "Threatened" on 04 April 2015 by the U.S. Fish and Wildlife Service.

b. There is a remote chance that an **Eastern Small-footed Bat (*Myotis leibii*)** could be using our rip-rap hillside above the detonation pit as a diurnal roost site. Although not a federally listed species, if a small bat is seen fleeing the rocks when the sampling occurs, work should cease and this office should be notified.

c. Regarding State listed species, the possible presence of the state endangered **Timber Rattlesnake (*Crotalus horridus*)**; and the state threatened **Wood Turtle (*Glyptemys insculpta*)** should be mentioned in the EA. Both reptiles could be in this area during the summer months, the rattlesnake near the rocks; whereas the wood turtle is often seen along Gorge Road and the riparian corridor of Green Pond Brook. If encountered or observed, work should cease and this office notified so preparation of state sighting reports can be completed and relocation of the venomous rattlesnake can be completed.

5. Point of Contact. **Mr. Jonathon D. Van De Venter**, Natural Resource Manager, Environmental Affairs Division, U.S. Army Picatinny Arsenal Garrison, e-mail: jonathan.d.vandeventer.civ@mail.mil, phone: 973-724-4691.



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