

*Private Fuel Storage, L.L.C.*

7677 East Berry Ave., Englewood, CO 80111-2137

Phone 303-741-7009 Fax: 303-741-7806

John L. Donnell, P.E., Project Director

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555-0001

July 20, 2001

**MAP CORRECTION: JULY 18, 2001 SUBMITTAL**  
**DOCKET NO. 72-22 / TAC NO. L22462**  
**PRIVATE FUEL STORAGE FACILITY**  
**PRIVATE FUEL STORAGE L.L.C.**

Reference: Stone & Webster letter, Sanchez to Delligatti, "References: Kass, May 1999 and Pritchett", May 2001

Stone & Webster provided reference material earlier this week (Reference 1) per an NRC request. It was noted that three data points in the reference material were erroneously identified by Dr. Pritchett with regard to their latitude/longitude location. Although these three points fall beyond the construction zone, PFS attempted to correct the information based on a locational description from Dr. Pritchett. However, the translation of these three points was not properly portrayed on the included map.

Attached with this letter is a corrected map showing the following three data points at their proper location. The three points remain outside of the construction zone. The PFS Environmental Report will be updated in the future to include the relevant reference material supplied to the NRC as discussed with Mr. M. Delligatti - NRC on July 19, 2001.

Pritchett - Original

N 40 24 09.1  
W 112 44 16.0

N 40 24 10.9  
W 112 44 01.9

N 40 24 11.1  
W 112 44 26.0

Corrected

N 40 24 10.5  
W 112 45 09.0

N 40 24 10.6  
W 112 45 08.4

N 40 24 10.4  
W 112 45 07.6

*NMSSol Public*

In addition to the corrected map the other documents included in Reference 1 are attached to this letter as the original submittal was not properly distributed to all parties.

If you have any questions regarding this submittal, please contact me at 303-741-7009.

Sincerely,

A handwritten signature in black ink, appearing to read "John L. Donnell". The signature is fluid and cursive, with the first name "John" being more prominent.

John L. Donnell  
Project Director  
Private Fuel Storage L.L.C.

Copy to: Mark Delligatti-1/1  
Scott Flanders-1/1  
John Parkyn-1/0  
Jay Silberg-1/0  
Sherwin Turk-1/0  
Greg Zimmerman-1/1  
Scott Northard-1/0  
Denise Chancellor-1/1  
Richard E. Condit-1/0  
John Paul Kennedy-1/0  
Joro Walker-1/0  
Duncan Steadman-1/0  
Utah Document File (D. Bird)-1/1

Enclosure

Orem, Utah  
6 May 2001

Mr. John Donnell  
Project Director  
Private Fuel Storage L.L.C.  
7677 Berry Avenue  
Denver, CO 80111-2137

Dear Mr. Donnell

Here are the data we looked at last Wednesday at the Private Fuel Storage Site.

ENVIRONS OF LOCATIONS 30 and 31, Two active burrow systems.  
N 40 24 11.0 W 112 46 48.8

ENVIRONS OF LOCATIONS 35, 36, AND 37, these recorded were the burrows  
that were. active


N 40 24 09.1	W 112 44 16.0
N 40 24 10.3	W 112 45 15.7
N 40 24 09.9	W 112 45 05.9
N 40 24 09.8	W 112 45 06.2
N 40 24 10.2	W 112 44 59.7
N 40 24 10.2	W 112 44 58.9
N 40 24 10.1	W 112 44 58.9
N 40 24 10.1	W 112 44 57.5
N 40 24 10.2	W 112 44 55.7
N 40 24 10.1	W 112 44 55.5
N 40 24 10.1	W 112 44 53.8
N 40 24 10.9	W 112 44 01.9
N 40 24 11.1	W 112 44 26.0
N 40 24 12.8	W 112 44 58.8
N 40 24 12.7	W 112 44 58.4
N 40 24 14.4	W 112 44 57.0
N 40 24 14.2	W 112 44 57.7
N 40 24 15.8	W 112 44 54.9
N 40 24 17.7	W 112 45 09.1
N 40 24 17.7	W 112 45 08.5
N 40 24 16.2	W 112 45 06.7

Active burrow systems found just north of location 37.

N 40 24 20.1	W 112 45 11.5
N 40 24 22.8	W 112 45 14.2
N 40 24 23.3	W 112 45 16.4
N 40 24 24.1	W 112 45 14.1

John as I looked farther north there were only two or three fresh mounds, I did not open them. Towards the north end of the Reservation I could not find any fresh mounds. It was rare to find any old mounds. I add this just in case changing the roadway is a possibility.

Respectfully



Clyde L. Pritchett

05996.02-W1

Orem, Utah  
10 May, 2001

Mr. Paul Gaukler  
2300 N Street, N W  
Washington, D C 20037-1128

Re: Documents Related to Utah Contention D D (Ecology and Species) Section 11 pp 120-123.

Dear Paul:

With regards to your concern about there being more than one subspecies of Pocket Gophers in the environs of Skull Valley, my response is, yes there is. However, the other two subspecies, as far as I have been able to tell, have not been collected in the environs of the proposed P F S F facility or rail road right of way. The three possibilities are Thomomys bottae robustus, Skull Valley pocket gopher, T. bottae stansburyi, Botta pocket gopher, and T. bottae albicaudatus, also called Botta pocket gopher.

The "Skull Valley pocket gopher," is found in Skull Valley, obviously. There are records of it being collected as far south as Indian Springs in the Simpson Mountains and I have seen sign of them on the north near Hwy I 80, giving this subspecies a north/south range of approximately 60 miles in length. The range of the "Stansbury" Pocket Gopher is on the Stansbury Mountains. The Stansbury Mountains are located on the North East side of Skull Valley. According to Dr. Durrant there appears to be an interaction, in some locations, between these two subspecies. The third subspecies, T. h. albicaudatus, are found from the south end of Davis County south into Juab County and west into Tooele County to the Onaqui and Sheeprock mountain. According to Dr. Durrant this subspecies has the largest geographic population of any subspecies in North and Central Utah. Dr. Durrant also indicates there appears to be intergradation between this subspecies and the Skull Valley pocket gopher on the south end of their ranges.

What I am trying to say is that there appears to be interactions between all three subspecies, but the location of the pocket gophers we are concerned with, in distance, are completely separated from these other two subspecies of pocket gophers.

I hope this answers your questions.

Respectfully,

  
Clyde L. Pritchett

cc: Mr. John Donnell

05996.02 - W1

Orem, Utah  
18 May 2001

Mr. John Donnell  
Project Director  
Stone & Webster  
7677 East Berry Avenue  
Greenwood Villa, CO 80111-4421

Dear John:

As of yesterday, I think our survey of the PFSF railroad line is complete. If I had known, at the onset, what the railroad portion involved, I would never have taken the project on. However, it is finished and I hope everyone involved feels all right about the work that has been completed.

I have one question. When we began this survey I did not realize how important an ATV would be in speeding up the work, so I did not include that in my budget. Tuesday, 15 May I had a piece of greasewood puncher one of the tires on my ATV. Wednesday, without an ATV, but using my truck where it could be used, then walking for several hours, it took me a very long day just to check two gopher burrows I had opened the day before. On the ATV the burrows could have been checked in four hours or less. Do you think it improper of me to charge the project the going rate, whatever that is, for the rental of an ATV? I feel without the ATV it would have taken me at least another two to three weeks to have completed this project.

Unlike the gopher mounds in Areas 35,36,37, which were fairly close together, the gopher mounds along the rail corridor were scattered. I was able to only find ten fresh gopher mounds and of these six burrows were closed when checked the following day. I will list the locations of these active burrow sites below.

When you and I visited the active burrow sites in the environs of areas 35, 36, and 37 you ask me if these burrows could have come into the area after the last survey was made a few years ago I have thought a lot about it. My first reaction was that they had been there for a long time. I still feel that way, but in all fairness to the individual making that survey, it is certainly possible that this little group might have moved in since that 1998 wildlife survey was made.

Please let me know soon if there is something else I should have completed, or that you would like me to do.

Respectfully Submitted:

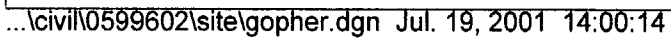
Clyde L. Pritchett

Page 2

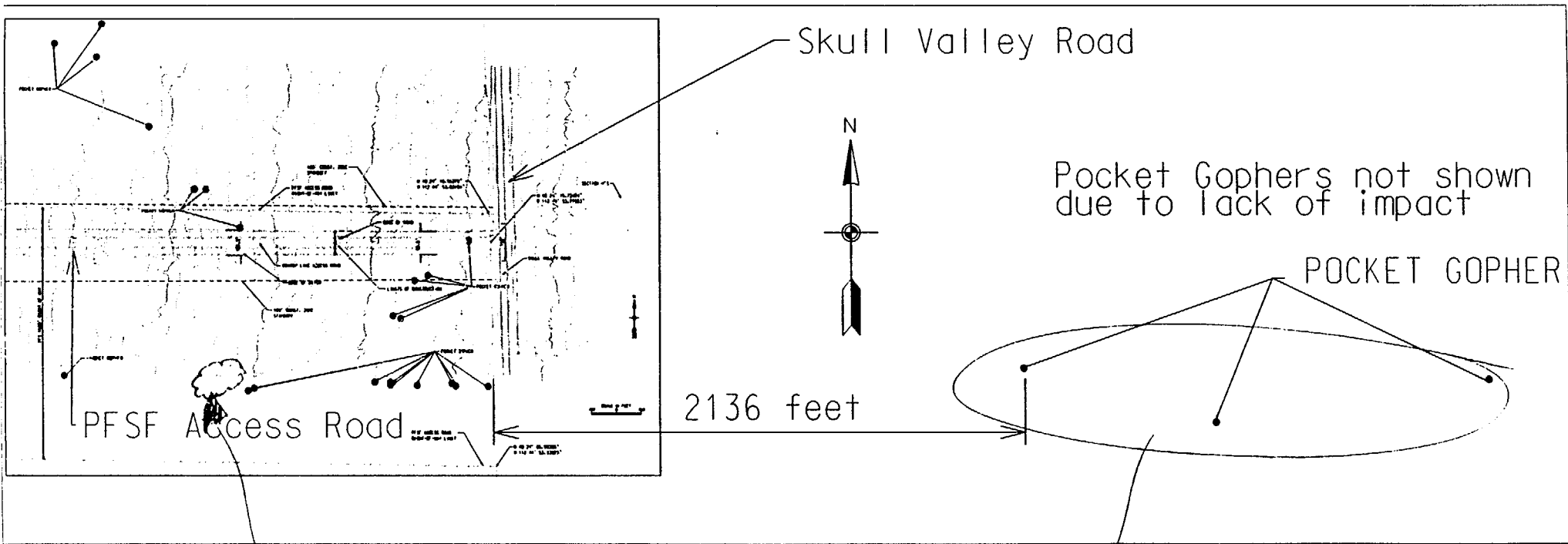
**POCKET GOPHER ASSESSMENT ON PROPOSED SKUNK RIDGE RAIL CORRIDOR**

1	N 40 49 11.6	W 112 53 26.6	
2	N 40 48 56.5	W 112 52 50.0	
3	N 40 48 53.2	W 112 52 45.9	
	N 40 48 53.0	W 112 52 46.0	(probably the same gopher as #3)
4	N 40 42 26.3	W 112 50 33.5	
5	N 40 37 44.0	W 112 50 42.5	
6	N 40 37 16.0	W 112 50 48.4	

John, with very few reference points to go by as I went from one waypoint to the next, it was difficult to know when I was two hundred feet from the center of the proposed track. Will you please check that for me. I purposely tried to go what I thought was more than two hundred feet on each side just to be certain. You can always delete those burrows that are outside of the four hundred foot right of way.



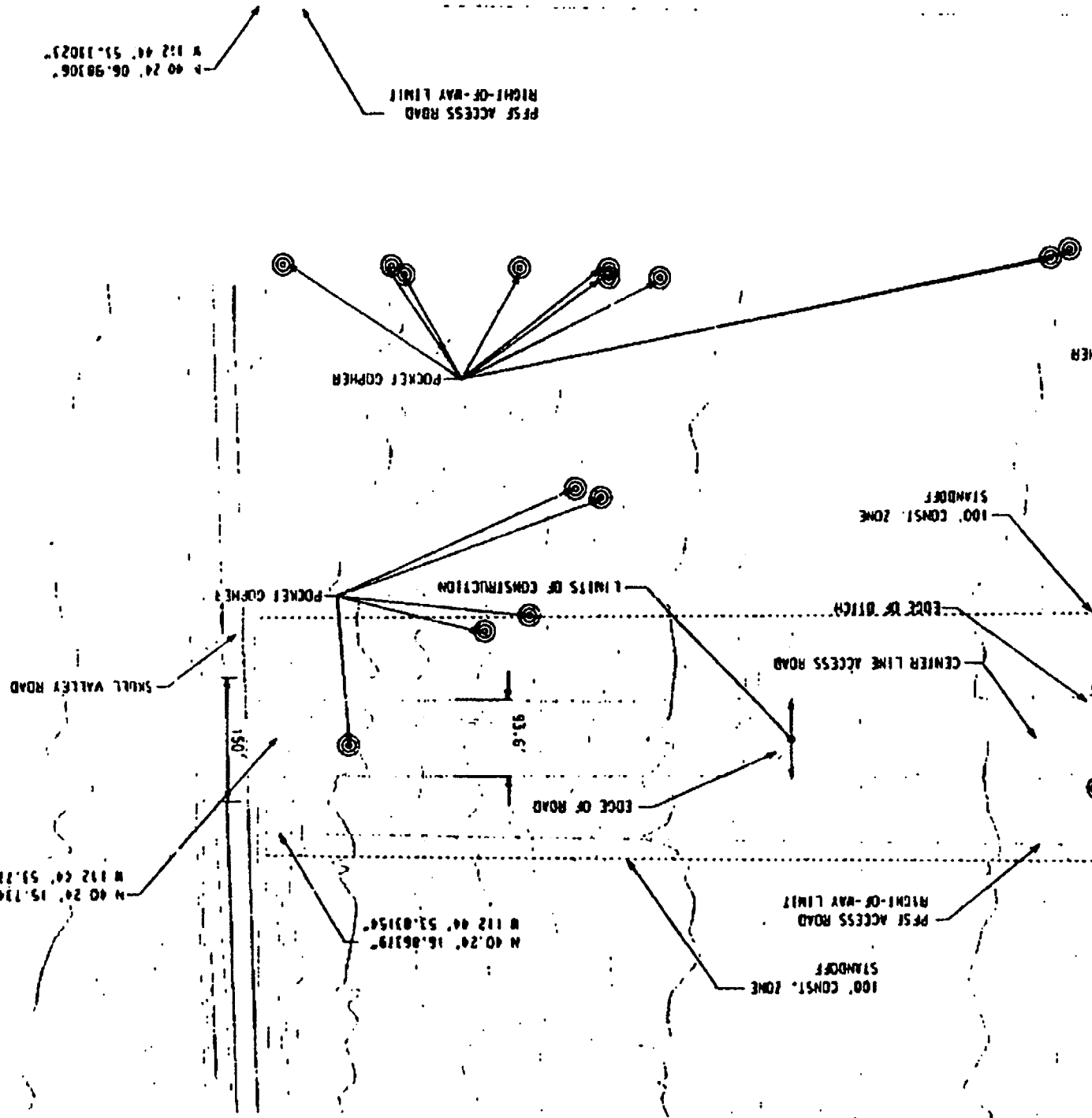
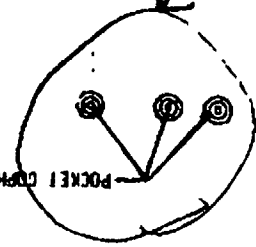




...\\civil\\0599602\\site\\gopher.dgn Jul. 02, 2001 12:41:54

Typo in Lat/Long DATA

*new  
cops  
added*

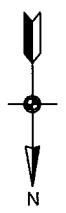
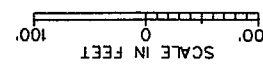


N 40 24' 06.98306"  
W 112 44' 53.18023"

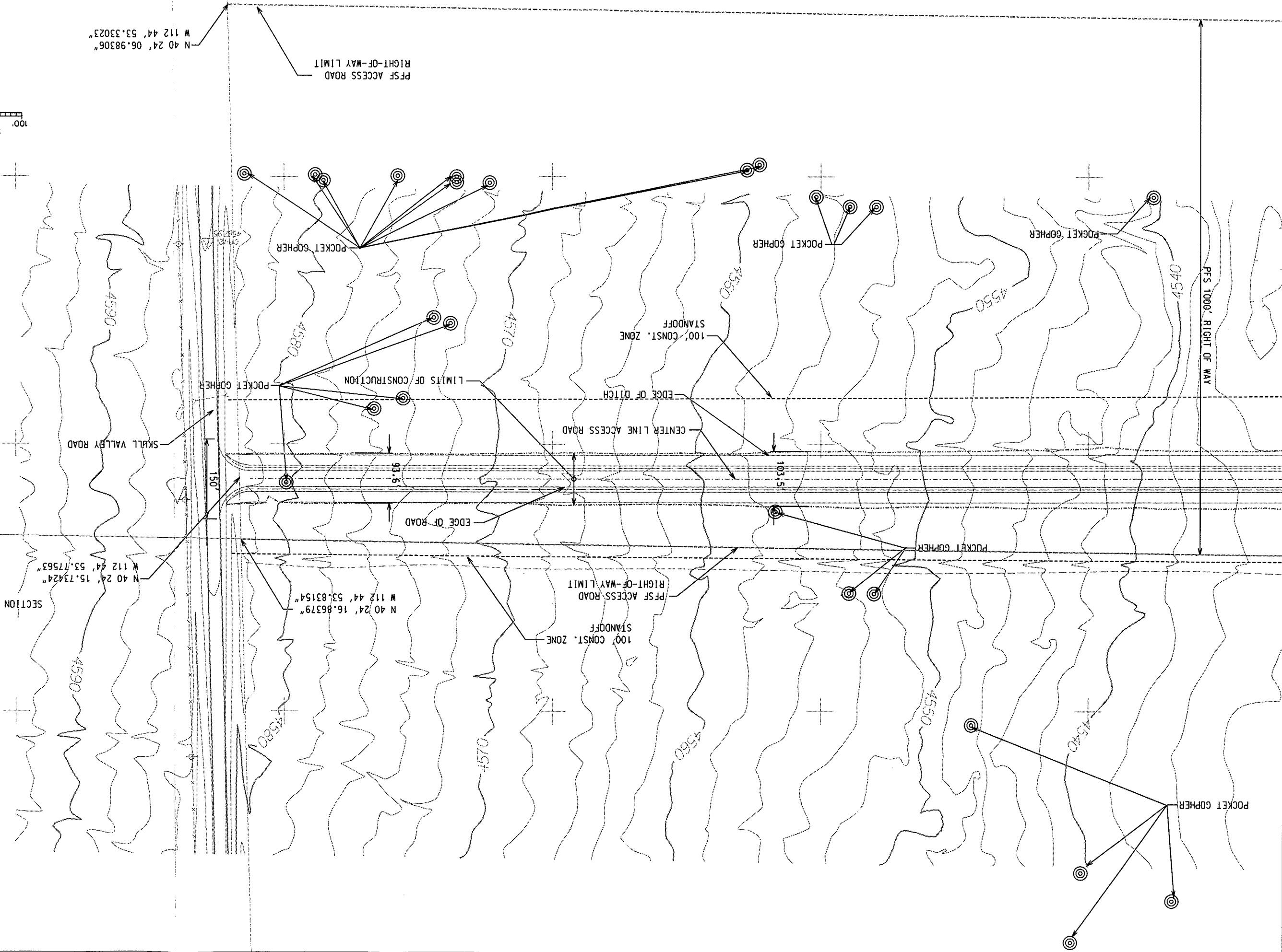
N 40 24' 15.13424"  
W 112 44' 53.27567"

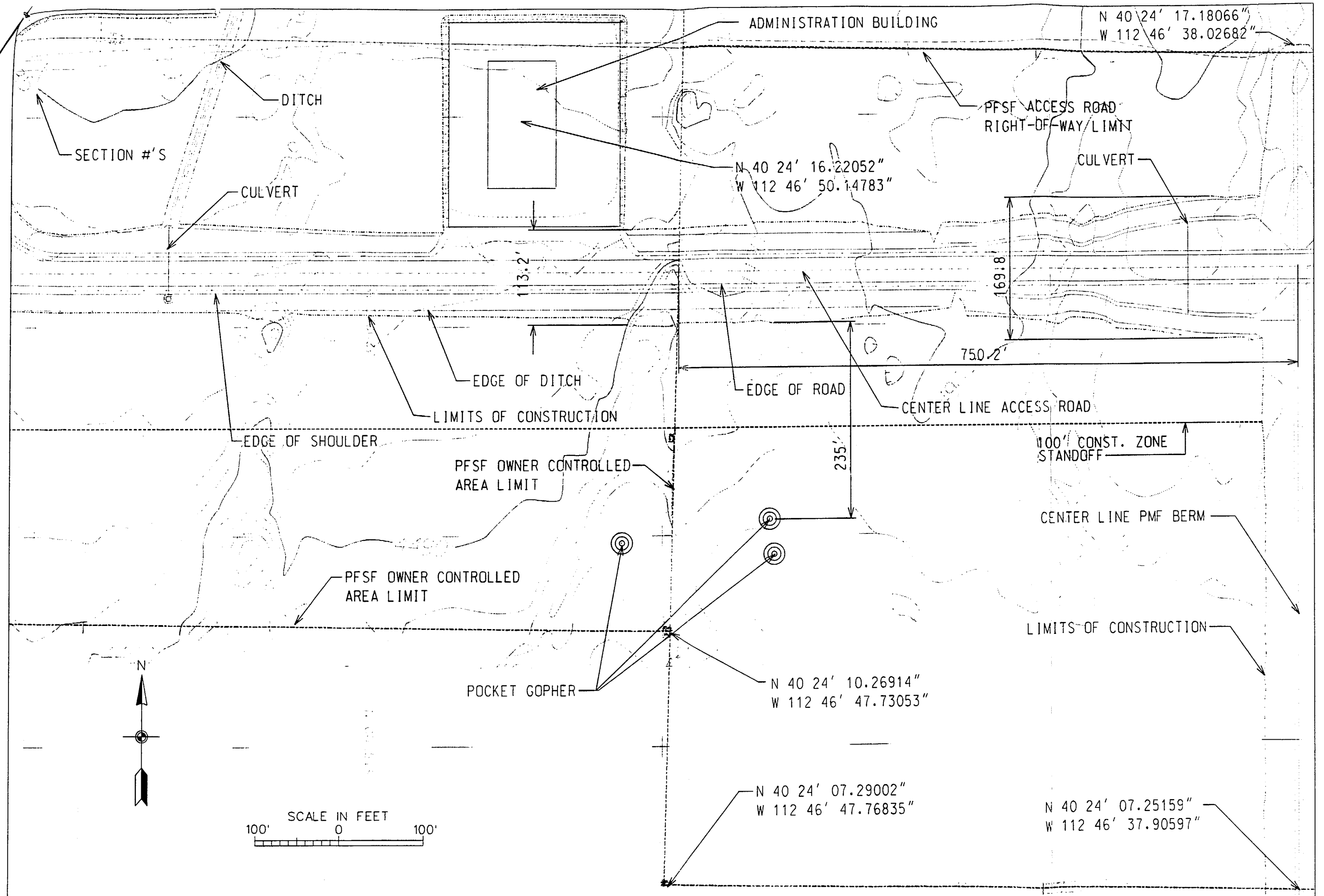
N 40 24' 16.86179"  
W 112 44' 53.83154"

SECT



9





0599602

PO # 21

PR 1.2C § WS

**PRIVATE FUEL STORAGE FACILITY  
PROPOSED ALTERNATE RAIL ROUTE  
PLANT SPECIES OF SPECIAL CONCERN INVENTORY  
SKULL VALLEY, UTAH**



Phone (801) 489-4590 • Fax (801) 489-8236  
270 East 1230 North • Springville, Utah 84663

**PRIVATE FUEL STORAGE FACILITY  
PROPOSED ALTERNATE RAIL ROUTE  
PLANT SPECIES OF SPECIAL CONCERN INVENTORY  
SKULL VALLEY, UTAH**

Prepared for:

**Stone & Webster Engineering Corp.  
7677 East Berry Avenue  
Englewood, Colorado 80111-2137**

Prepared by:

**Intermountain Ecosystems, L.L.C  
270 East 1230 North  
Springville, Ut. 84663**

**12 May 1999**

## TABLE OF CONTENTS

1.0 INTRODUCTION . . . . .	-1-
1.1 Project Scope . . . . .	-1-
1.2 Physiography . . . . .	-1-
1.3 Geology . . . . .	-2-
1.4 Climate . . . . .	-2-
1.5 Vegetation . . . . .	-2-
2.0 METHODS . . . . .	-4-
2.1 Herbarium Search and Field Inventory . . . . .	-4-
3.0 RESULTS . . . . .	-4-
3.1 <i>Astragalus lentiginosus</i> var. <i>pohlii</i> . . . . .	-4-
3.2 <i>Cymopterus acaulis</i> var. <i>parvus</i> . . . . .	-4-
3.3 <i>Atriplex lentiformis</i> . . . . .	-5-
4.0 LITERATURE CITED . . . . .	-6-

## LIST OF FIGURES

Fig 1. Map of the Project Area . . . . .	-3-
------------------------------------------	-----

## 1.0 INTRODUCTION

### 1.1 Project Scope

The following report is a summary of the 1999 Plant Species of Special Concern field inventory conducted at the proposed Private Fuel Storage Facility (PSFS) located on the Skull Valley Goshute Indian Reservation. In 1998, a similar inventory was conducted in the project area and the following proposed facilities were inventoried: (1) Intermodal Transfer Point, (2) Low Transportation Corridor (LTC), and (3) the existing Skull Valley Road (Kass 1998).

The 1999 inventory was conducted on the proposed Alternate Rail Route, a revised portion of the LTC which includes approximately the last 6 miles of the rail line. The new potential route will turn east approximately 3 miles north of the PSFS, proceed east for approximately 3 miles, and then turn south for 3 miles to the PSFS (Fig 1). The majority of the revised portions are located on land administered by the Bureau of Land Management (BLM) Salt Lake District Office.

One directive of the BLM is a requirement for addressing threatened, endangered, and species of special concern as part of the requirements of the Endangered Species Act of 1973. BLM is required to comply with mandates under the Endangered Species Act, and its own mandate, the BLM 6840 Manual for sensitive species. As a result of these mandates, Stone & Webster Engineering of Englewood, Colorado has requested a rare plant inventory in the proposed project area .

The following plant species were suggested as possibly occurring within the proposed project area and include: (1) Pohl's milkvetch (*Astragalus lentiginosus* var. *pohlii* Welsh & Barneby), (2) small spring parsley (*Cymopterus acaulis* var. *parvus* Goodrich), and (3) big saltbush (*Atriplex lentiformis*) (Torr.) Wats.

### 1.2 Physiography

The project area occurs on the eastern boundary of the Great Basin Physiographic Province. It is characterized by a series of long, parallel, north and south trending mountain ranges separated by broad valleys filled with unconsolidated alluvium (Hunt 1967). These fault-block ranges are slowly rising, and the valleys between are downthrown as horsts and grabens. Since these valleys were formed by crustal movement and not carved by flowing rivers, no overall drainage pattern develop (Hunt 1967). Locally, the project area is mainly confined to Skull Valley which occurs between the Stansbury Mountains to the east, and Cedar Mountains to the west. Project area elevation is approximately 1355 m (4445 ft).



### 1.3 Geology

The Stansbury and Cedar Mountains consists of very thick limestones and fine sandstones of marine origin, and form a member of the Pennsylvanian-Permian Oquirrh Group. Skull Valley proper is composed of fine-textured Quaternary sediments which reflect the geologic history of Pleistocene Lake Bonneville with its alluvial deposits and formation of shorelines (Currey et al. 1984).

### 1.4 Climate

The nearest location with long-term climatic records is the town of Tooele, located north of the project area at 1545 m (5070 ft). Average January and July temperatures are -1.7° C (30° F) and 24.7° (76° F) respectively, with average annual temperatures of 10.6° C (50° F). High and low temperatures are 35.6° C (95° F) and -22.2 C° (-8° F). Average annual precipitation is 41.4 cm (16.3 in) with largest amounts falling in the months of March thru May. Average annual precipitation in Skull Valley is probably much less (Ashcroft et al. 1992).

### 1.4 Vegetation

For the most part, the project area is dominated by greasewood (*Sarcobatus vermiculatus*) typically found in saline valley bottoms. Native salt desert shrubs such as shadscale (*Atriplex confertifolia*), budsage (*Artemisia spinescens*), horsebrush (*Tetradymia glabrata*), winterfat (*Ceratoides lanata*), and native grasses such as galleta grass (*Hilaria jamesii*), Indian ricegrass (*Stipa hymenoides*), sand dropseed (*Sporobolus cryptandrus*), and alkali sacaton (*Sporobolus airoides*) are sparse to virtually absent from most of the project area.

The most commonly occurring species are invasive annuals such as cheatgrass (*Bromus tectorum*), peppergrass (*Lepidium perfoliatum*), bur buttercup (*Ranunculus testiculatus*), and tansy mustard (*Descurainia sophia*). The abundance of invasive annuals and paucity of native plant communities reflects the past history and repeated cycles of overgrazing, drought, and fire (Cottam 1976, Rogers 1982, Billings 1990).

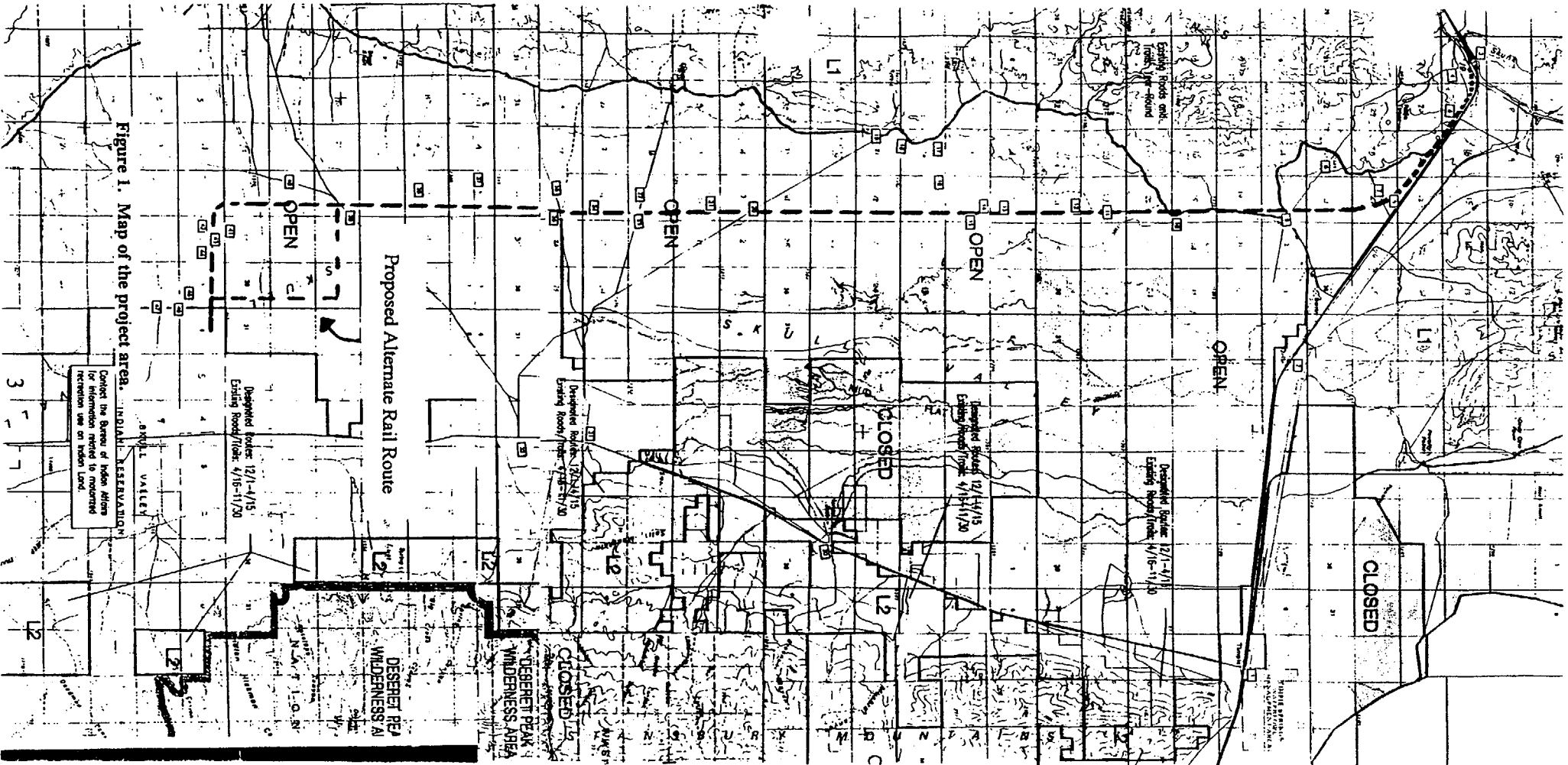


Figure 1. Map of the project area. INDIAN RESERVATION

## 2.0 METHODS

### 2.1 Herbarium Search and Field Inventory

A herbarium search of the target taxa was conducted in May of 1998 prior to the field inventory (Kass 1998). The 1999 field inventory was conducted in T4S, R9W, S22-25, 36, and T5S, 9W, S1 by Dr. Ronald J. Kass, botanist during May 7th. A right-of-way (ROW) of approximately 2640 feet wide (0.25 miles on each side of the route centerline) was inventoried.

Inventory methods consisted of driving along the corridors where possible and walking through the project area looking for plant occurrence and/or potential habitat. When potential habitat was located, linear transects were walked until the field personnel were convinced that no target taxa occurred in that particular area. If target taxa were located, field personnel recorded data on a population-habitat data sheet and USGS 7.5 quad, took a photograph of plant and its habitat, and recorded a GPS position. All taxonomy follows Welsh et al. (1993).

## 3.0 RESULTS

### 3.1 *Astragalus lentiginosus* var. *pohlii*

Pohl's milkvetch is currently listed as a species of special concern by the BLM. This herbaceous, perennial milkvetch has large, pale flowers 20-23 mm (0.7 in.) and short, speckled, stipitate pods (Welsh et al. 1993). It grows on exposed clays and fine sands in sagebrush, salt desert shrub, and greasewood communities at approximately at 1330 to 1650 m (4362-5412 ft). It is endemic to Rush and Skull Valleys of Tooele County, Utah. Pohl's milkvetch **was not located along the revised portion of the LTC**. In 1998, the Pohl's milkvetch was located on the road to Hickman Knolls (Kass 1998).

### 3.2 *Cymopterus acaulis* var. *parvus*

Spring parsley **was not located in the project area**. It is found on sandy areas and sand dunes in salt desert shrub, sagebrush and pinyon-juniper communities. The 1998 and 1999 inventory did not locate any suitable habitat in the project area nor were there any previous locations documented in the herbarium search of the project area.

### **3. 3 *Atriplex lentiformis***

The herbarium search indicated no previous locations in the project area. This species is listed as occurring in Washington County, Ut. and adjacent Mojave Desert regions (Welsh et al. 1993). It appears to be a warm desert species and the likelihood of finding it in the project area would be exceptional.

#### 4.0 LITERATURE CITED

- Ashcroft, G. L., J. T. Jensen and J. L. Brown. 1992. Utah Climate.
- Billings, W. D. 1990. *Bromus tectorum*, a biotic cause of ecosystem impoverishment in the Great Basin. Pages 301-322 in Woodwell, GM (ed.): The earth in transition -- patterns and processes of biotic impoverishment. Cambridge University Press, Cambridge, UK.
- Cottam, W. P. 1976. The impact of man on the flora of the Bonneville Basin. Department of Geography Research Paper No. 76-1. University of Utah, Salt Lake City, Utah. 8 p.
- Currey, D. R., C. G. Oviatt, and J. E. Czarknonski. 1984. Late Quaternary geology of Lake Bonneville and Lake Waring. Utah Geological Association Publications 13: 227-238.
- Hunt, C. B. 1967. Physiography of the United States. W. H. Freeman and Co. San Francisco, Ca.
- Kass, R. J. 1998. Rare plant inventory of the Private Fuel Storage Facility, Skull Valley, Ut. Consultant report submitted to Stone & Webster, Engelwood Colo. 6 p.
- Rogers, G. F. 1982. Then and now: a photographic history of vegetation change in the central Great Basin desert. University of Utah Press, Salt Lake City. 152 p.
- Welsh, S. L., N. D. Atwood, L. C. Higgins, and S. Goodrich. 1993. A Utah Flora. 2nd ed. Brigham Young University Print Services. 986 p.