



**Department of Energy**  
Savannah River Operations Office  
P.O. Box A  
Aiken, South Carolina 29802

MAY 9 2019

Mr. Gil Allensworth, Chairperson  
Savannah River Site Citizens Advisory Board  
P.O. Box A  
Aiken, South Carolina 29802

Dear Mr. Allensworth:

SUBJECT: Citizens Advisory Board (CAB) Recommendation 361 – Pollinator Management Plan  
(Your letter, dated March 26, 2019)

Thank you for your recommendation about a Pollinator Management Plan. The Department of Energy Savannah River Operations Office (DOE-SR) partially accepts this recommendation and provides the following responses.

**CAB Recommendation:**

The Savannah River Site (SRS) CAB suggests that DOE-SR consider the following for the rejuvenation, enhanced growth and development of pollinators at the Site:

- 1. Plant indigenous pollen-generating flowers, trees, and shrubs throughout the Site, including the Right-Of-Way, and consider exploring the effects of various environmental factors on pollinator species.*

DOE accepts this subpart. The United States (U.S.) Forest Service - Savannah River (USFS-SR) annually plants 10 acres of pollinator habitat on SRS. In the past, those plantings have primarily been along the powerline right-of-ways. In 2019, the USFS-SR is planting pollinator habitat within the boundary of previously closed waste units around SRS, in support of the beneficial reuse of these brownfield locations. Other USFS-SR practices that support pollinators include adjusted planting practices to encourage a more diverse plant population, and thinning of 3,500 acres of forest annually, which creates conditions more conducive to pollinator habitat.

SRS is already home to an abundance of ideal pollinator habitat, and steps are being taken to ensure those well-established habitats remain undisturbed. The nearly 170,000 acres of natural resources on SRS are home to numerous pollinator species including bees, wasps, butterflies, moths, beetles, bats, hummingbirds, and perching birds. (See Enclosure). DOE-SR; Savannah River Nuclear Solutions, LLC (SRNS); and USFS-SR are working on the best way to maintain the existing pollinator habitats (e.g., wild plum thickets around the closed reactor areas), and Dominion Energy is collaborating with SRNS Environmental Compliance and Site Services staff to manage the powerline right-of-ways in a manner that is least impactful to pollinator habitat, while still meeting all safety and accessibility requirements.

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Both the Savannah River Ecology Laboratory (SREL) and the USFS-SR conduct research on pollinator habitats and impacts, and DOE-SR will continue to support those efforts.

2. *Develop a management plan in concert with the U.S. Forest Service to protect the pollinators in the areas designated for clearing and/or controlled burning in order to provide alternate native ecological habitats for the healthy growth and development of said pollinators. All activities should be approved by a designated single committee comprising of biologists from the Savannah River National Laboratory (SRNL), SREL and Forest Services to ensure the minimization of damage to the ecological environment for the pollinators of the area. This effort could help to reduce the loss of pollinators at the Site and surrounding communities.*

DOE-SR partially accepts this subpart. DOE-SR will continue to support the USFS-SR's effective management of close to 170,000 acres of natural resources on SRS and the implementation of practices to maintain and enhance pollinator habitat across the Site. Specifically, USFS-SR is working to increase the biodiversity of native flowering plants by planting species ideally suited to the Southeast; thin and burn pine plantations which improve conditions for pollinators; and is working with DOE-SR to establish pollinator habitats at closed waste units across SRS.

All USFS-SR policies and procedures are assessed by a full staff of subject matter experts, including biologists and ecologists, both internally within the Forest Service and through the SRS Interdisciplinary Team. All forest management activities are reviewed by the appropriate entities on SRS through the Site Use/Site Clearance process, so, at this time, DOE-SR does not plan to create a separate committee to oversee USFS-SR forest management practices.

3. *Designate one single entity, such as an oversight committee, to monitor and approve the application of all insecticides, fungicides, and herbicides that are used on the Site.*

DOE partially accepts this subpart. The management and operating contractor for SRS provides a Pesticide Program Administrator (PPA) who is responsible for compliance with the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) and the South Carolina Pesticide Control Act. The PPA approves all pesticides (including herbicides) that are used on SRS, but does not review each individual pesticide application. However, pesticide applications are recorded in the Pesticide Activity Report database to document regulatory compliance.

At SRS, most insecticide applications are indoor for controlling ants and roaches or outdoor to control fire ants, and are not considered to be a threat to pollinators. Herbicide applications, used to control weeds in industrial and developed portions of the Site for operational and safety reasons, do not impact pollinator habitats, and the PPA works with right-of-way management personnel to identify high-value pollinator habitats and develop a spot-treatment plan for controlling vegetation to meet regulatory standards. Due to the extensive forest management practices conducted by the Forest Service, the USFS-SR manages their own pesticide program according to their agency rules and regulations.

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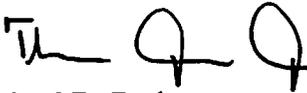
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The Department thanks you for your recommendation, and values the CAB's position on SRS programs, and, when possible, factors those opinions into Department decisions.

If you have any questions, please contact me or Tony Towns, of my staff, at (803) 952-7822.

Sincerely,

for 

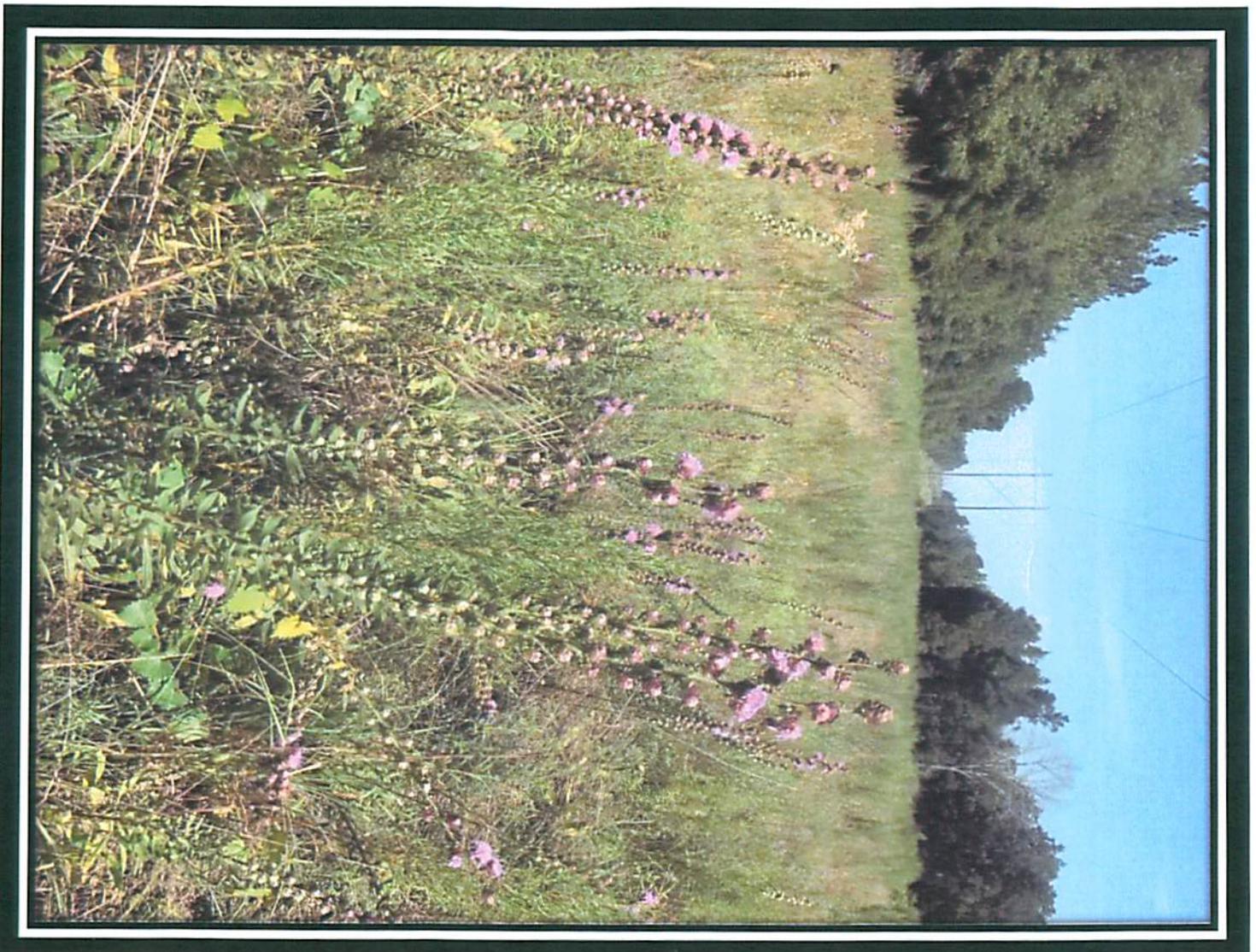
Michael D. Budney  
Savannah River Site Manager

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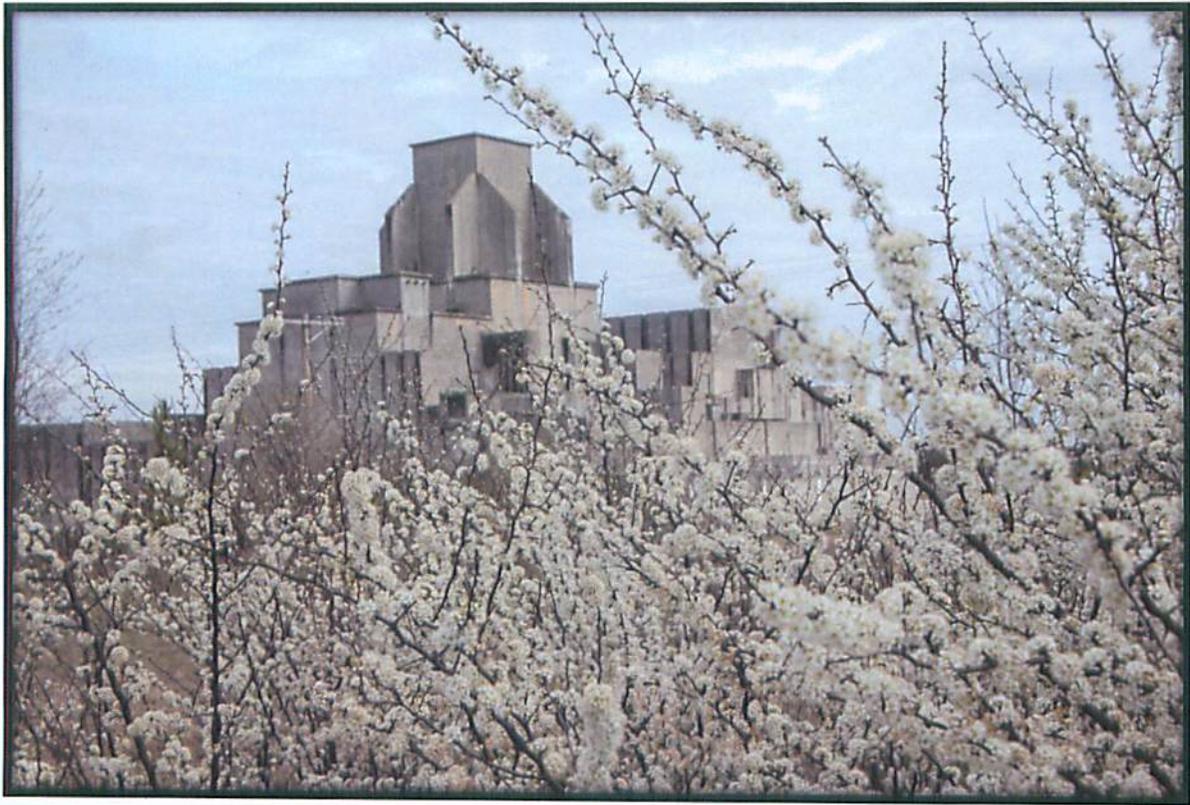
Enclosure:  
Examples of Pollinator  
Habitats on the SRS

cc w/encl:  
David Borak, EM-4.32  
Kristen Ellis, EM-5.31  
Michael Mikolanis, DDFO  
Jim Folk, DDFO  
Marshal Taylor, Jr., SCDHEC  
Matthew Fritz, EPA  
Mark Williams, GA DNR

Examples of Pollinator Habitats on the Savannah River Site



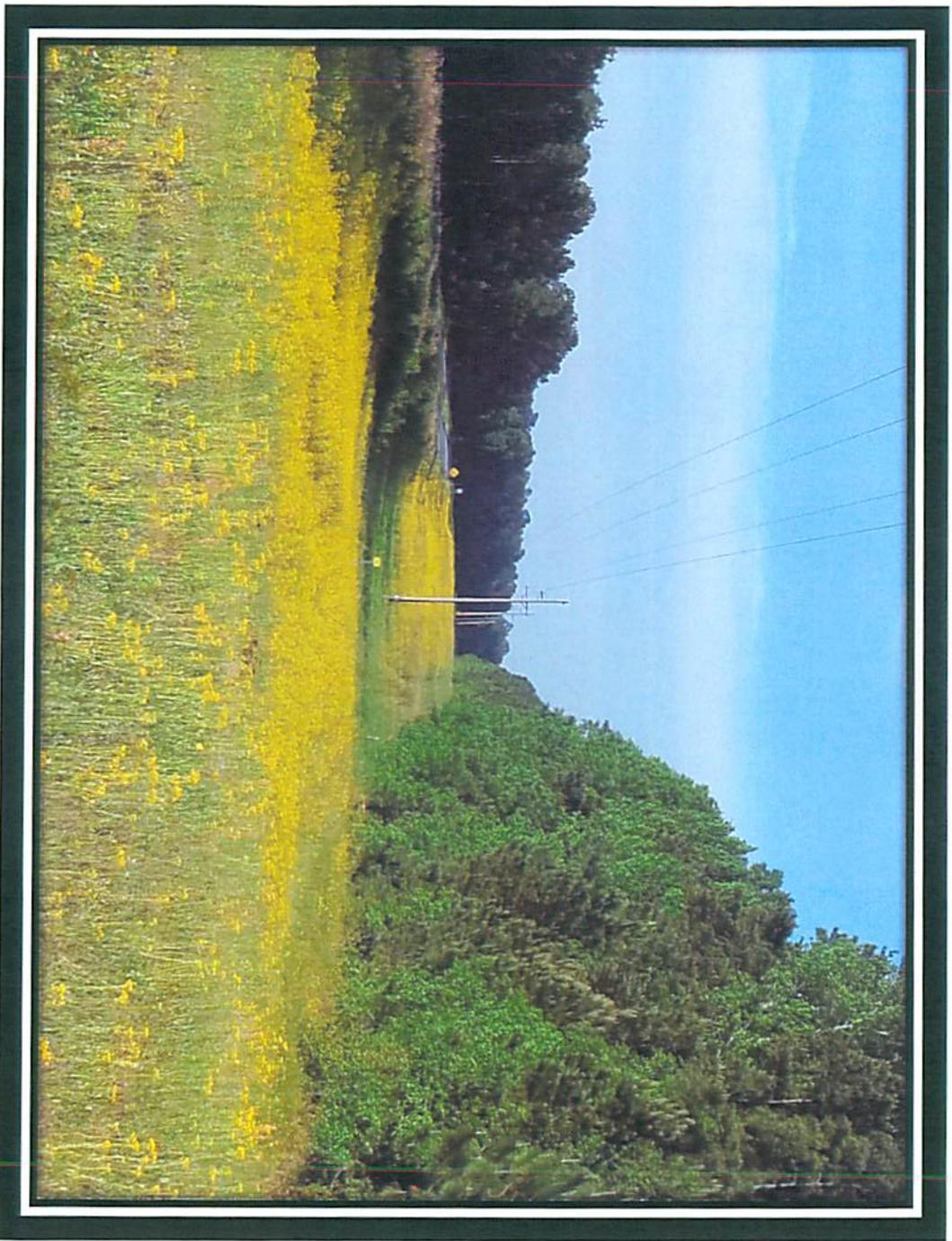
Pollinator Plot on Power Line Right-of-Way



Plum Thicket Habitat at R-Reactor



Spice Bush Swallowtail on Moss Verbena at P-Reactor



Pollinator Habitat Along SRS Roadway