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*Date*: MAY 2 3 2012
*Refer To*: EP2012-0115

John Kieling, Bureau Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303

**Subject: Request for Extension for the Construction of the Sandia Canyon Wetland Grade-Control Structure**

Dear Mr. Kieling:

This letter requests a 1-year extension to complete construction of the Sandia Canyon wetland grade-control structure from July 1, 2012, to July 1, 2013. The extension request is primarily based on a longer-than-anticipated time to receive approval from the U.S. Fish and Wildlife Service (USFWS) on a biological assessment (BA) for potential impacts of constructing an access road into Sandia Canyon. Previous BA submissions to the USFWS typically have been reviewed within 60 days. Based on this previous experience, Los Alamos National Laboratory (the Laboratory) submitted this BA on January 20, 2012, in anticipation of a late March commencement of construction activities. The Laboratory contacted the USFWS to obtain an anticipated approval date, but the USFWS was unable to provide that information. To date, the Laboratory has not received a response on the BA from the USFWS. Therefore, the Sandia Canyon wetland grade-control structure project is behind schedule.

The Laboratory has evaluated other options for constructing an access road, including those that could be performed without a BA. Unfortunately, constructing the road under the requirements of the current Habitat Management Plan is not possible because of the density of mature trees (greater than 9 in. in diameter) in the protected habitat that will require removal in order to construct the road. Other evaluated options would adversely impact the wetlands that are to be revitalized through this project or would require costly construction techniques. Although the project is now approximately 60 days behind schedule, the impact of this delay is much greater than 60 days because of the short premonsoon construction season. The delay in receiving the BA would now require construction of the grade-control structure and associated soil-disturbing activities to occur during the rainy season, which would create a much greater potential for contaminant transport in the event of a flood or significant rain event.

Therefore, the Laboratory proposes the above completion date in order to await approval from the USFWS for the BA and then to construct the access road and grade-control structure as currently designed during months when the potential environmental impacts of soil-disturbing construction activities will be lessened.

If you have any questions, please contact Steve Veenis at (505) 667-0013 (veenis@lanl.gov) or Ramoncita Massey at (505) 845-4675 (ramoncita.massey@nnsa.doe.gov).

Sincerely,

B. G Schappell for MJG

Michael J. Graham, Associate Director
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Sincerely,

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