



State of Ohio Environmental Protection Agency

Southwest District Office

401 East Fifth Street
Dayton, Ohio 45402-2911
(513) 285-6357
FAX (513) 285-6249

FERNALD

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George V. Voinovich
Governor

FILE

February 7, 2000

Mr. Johnny Reising
U.S. Department of Energy, Fernald Area Office
P.O. Box 538705
Cincinnati, OH 45253-8705

Re: COMMENTS – A8P2 NRRDP

Dear Mr. Reising:

The Fernald Natural Resource Trustees (Ohio EPA, Department of the Interior and DOE) have reviewed DOE's December 17, 1999 submittal, "Transmittal of the Draft Natural Resources Restoration Design Plan for Area 8 Phase II." The attached comments are a compilation of comments and issues agreed upon by the Trustees..

If you have any questions, please contact me at (937) 285-6466.

Sincerely,

Thomas A. Schneider
Fernald Project Manager
Office of Federal Facilities Oversight

cc: Mike Chezik, DOI
Pete Yerace, DOE
Bill Kurey, USFWS
Tim Kern, Ohio AG
Jim Saric, U.S. EPA
Terry Hagen, FDF
Mark Shupe, HSI GeoTrans
Francie Hodge, Tetra Tech EM Inc.

A8PII ECOLOGICAL RESTORATION DESIGN COMMENTS
January 2000

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- 1) Commenting Organization: Fernald Trustees Commentor: FWS
Section #: 1.1 Pg #:1 Line #:26 Code:
Original Comment #: 1
Comment: The "vernal pools" which are a kind of wetland, would perhaps be more appropriately called wetlands in the design plan. It is by no means certain that the proposed wetlands will develop the characteristics of vernal pools, but they may become wetland. Because "all of the soils are well drained and considered poorly suited for wetland establishment," it is unlikely that a high quality wetland or vernal pool will develop very soon, if ever.

- 2) Commenting Organization: Fernald Trustees Commentor: FWS
Section #: 2.3.3.1 through 2.3.3.4 Pg #: 10 Line #: Code:
Original Comment #: 2
Comment: These sections should discuss the pattern of planting for the saplings and seedlings. Will they be evenly spaced or clumped? How will the planting points be decided? How will the species interspersion be determined? Will there be any pure stands? Also, what equipment and techniques will be used to plant the trees, saplings, shrubs, and grasses, i.e. please list the motorized equipment, shovels/planting bars, tractors, trailers, watering equipment, etc., and how will they be used.

- 3) Commenting Organization: Fernald Trustees Commentor: FWS
Section #: 3.1.2 Pg #: 13 Line #: 24 Code:
Original Comment #: 3
Comment: The Road Construction Section mentions a "400 foot access road." However, the figures don't show any access roads that are 400 feet long. Please correct either the text or the figures that depict A8PII.

- 4) Commenting Organization: Fernald Trustees Commentor: FWS
Section #: 3.2 Pg #: 14 Line #: 4 Code:
Original Comment #: 4
Comment: The materials handling area is supposed to be about 4 acres, but Figure 2 does not clearly indicate the extent of the area. Please indicate more clearly the extent of the materials handling area in Figure 2. This section should also document the need for wood chips and tell how they will be used. How will the wood chips be applied?

- 5) Commenting Organization: Fernald Trustees Commentor: FWS
Section #: 3.3 Pg #: 14 Line #: Code:
Original Comment #: 5
Comment: This section should be titled "Additional Wetland," please see comment number 1 above. By calling these ponds "additional" the existence of other ponds is implied. Where are the other ponds? Also, there is a need for more construction detail of the "vernal ponds" and a discussion of how they will be maintained, vegetated, and operated.

- 6) Commenting Organization: Fernald Trustees Commentor: FWS
Section #: 3.3 Pg #: 14 Line #: 26 Code:
Original Comment #: 6
Comment: There may be an arithmetic error in this sentence. Forty cubic yards seems a bit much for a 10 foot

diameter hole that is 3 feet deep. About 9 cubic yards?

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- 7) Commenting Organization: Fernald Trustees Commentor: FWS
Section #: 3.4.1 Pg #: 15 Line #: 8 Code:
Original Comment #: 7
Comment: Please remove "DOE and other" and start the sentence with "The Trustees." DOE is a trustee and the current wording is redundant.
- 8) Commenting Organization: Fernald Trustees Commentor: FWS
Section #: 3.4.2 Pg #: 15 Line #: Code:
Original Comment #: 8
Comment: If the topsoil in the drainage swales and the "vernal pools" will be replaced, it should be replaced with wetland (hydric) soil. This is necessary so that the wetland soil seed bed can germinate and vegetate these wetlands. We suggest that the clean wetland soils from the trap range area be stockpiled for use in these and other on site wetland restorations.
- 9) Commenting Organization: Fernald Trustees Commentor: FWS
Section #: 4.1.1 Pg #: 16 Line #: Code:
Original Comment #: 9
Comment: Soil amendments should be used as necessary. We understand that information about appropriate soil amendments is readily available from the Ohio Division of Forestry.
- 10) Commenting Organization: Fernald Trustees Commentor: FWS
Section #: 4.1.7 Pg #: 17 Line #: Code:
Original Comment #: 10
Comment: Although erosion control for the 5 cow paths is addressed in this section, the 2 ditches that enter Paddys Run through A8PII aren't mentioned. Will these ditches require hardening to prevent head cutting? What techniques will be used?
- 11) Commenting Organization: Fernald Trustees Commentor: FWS
Section #: 4.1.8 Pg #: 18 Line #: Code:
Original Comment #: 11
Comment: Again, the title of this section is misleading, see comment number 1 above. The primary purpose of these ponds is to act as sediment traps for the materials handling area. Will there be any restoration of the pools after the materials handling area is removed from service? Also, line 7 should specify the table which contains the native grass mix to be used in the pool areas.
- 12) Commenting Organization: Fernald Trustees Commentor: FWS
Section #: 4.2.3 Pg #: 19 Line #: Code:
Original Comment #: 12
Comment: The planting sequence would seem to be more appropriate if the erosion control was conducted prior to the general planting. This would have the advantage of not driving through the site restoration vegetation in order to get to the more distant erosion control areas near Paddys Run. Also, the successful planting of the dormant erosion control plants requires cold weather.
- 13) Commenting Organization: Fernald Trustees Commentor: FWS
Section #: 4.2.7 Pg #: 20 Line #: 32 Code:
Original Comment #: 13

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Comment: What kind of seed will be planted in the "small grassland strip?" Are there forbs in the seed mix? If not, why not?

- 14) Commenting Organization: Fernald Trustees Commentor: FWS
Section #: 5.1.1.1 Pg #: 23 Line #: 8 Code: = 2800
Original Comment #: 14
Comment: Replacement plants should be brought back to 100% of the original number planted. If they are brought back to 80% and even one more plant dies, then you have to replant. With 100% replacement you can be more confident of achieving the 80% goal even with some mortality. If there is a very large mortality, there should be a review to determine the cause.
- 15) Commenting Organization: Fernald Trustees Commentor: FWS
Section #: Pg #: Line #: Code:
Original Comment #: 15
Comment: We saw no information on the use of mycorrhizal fungi inoculation of tree roots in A8P11. If the use of this material is anticipated, please indicate the details of the source and use in the design plan. We understand this material greatly enhances tree survival and growth, especially in unproductive soils.
- 16) Commenting Organization: Fernald Trustees Commentor: FWS
Section #: 5.1.1.2 Pg #: 23 Line #: Code:
Original Comment #: 16
Comment: How will the need for maintenance burning of the native grasses be determined? Under what conditions will the grasses be burned? What precautions will be taken to prevent the spread of the fire? Will there be a fire management plan developed?
- 17) Commenting Organization: Fernald Trustees Commentor: FWS
Section #: 5.2.4 Pg #: 26 Line #: 30-31 Code:
Original Comment #: 17
Comment: Arrangements for the perpetual maintenance of the "savannas," prairies, and native grasses should be arranged in perpetuity before FEMP restoration is complete. If these grassland communities can't be maintained they will cease to exist. If they cease to exist the funds expended on their creation will have been wasted and the public will not have been compensated. Long term maintenance must be part of the settlement.
- 18) Commenting Organization: Fernald Trustees Commentor: FWS
Section #: Table 8 Pg #: Line #: Code:
Original Comment #: 18
Comment: Please include some forbs in the seed mix.
- 19) Commenting Organization: Fernald Trustees Commentor: FWS
Section #: Appendix A Pg #: Line #: Code:
Original Comment #: 19
Comment: Appendix A would be an appropriate place to discuss the use of micorrhizal fungi tree root inoculation.
- 20) Commenting Organization: Fernald Trustees Commentor: FWS
Section #: Pg #: Line #: Code:
Original Comment #: 20
Comment: Please add a section on patches to the design plan.

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- 21) Commenting Organization: Fernald Trustees Commentor: OFFO
 Section #: Pg #: Line #: Code: M
 Original Comment #: 1
 Comment: This project is a demonstration project, that is it is a demonstration not only of the specifics of restoring (revegetating) the site, but also of the process of involvement of the trustees in approval of the designs. As a demonstration of the process, this project has failed. In October of 1998 meetings were held on site at which inspection of the area was made and consensus was reached on the concept of the revegetation of this area. It is unacceptable that it has taken this long to get a design plan to the trustees. Planting of this area should have taken place during the Fall of 1999 at the latest. It appears as though the Department of Energy internal review process is thwarting the progress of site restoration. It is the trustees that have approval authority for the NRRDP as indicated in this plan (section 3.4.1 and section 4.2.1). In October of 1998 the trustees were in agreement of the design as discussed and 14 months later a design is formally submitted for approval. These time frames are not acceptable.
- 22) Commenting Organization: Fernald Trustees Commentor: OFFO
 Section #: Pg #: Line #: Code: C
 Original Comment #: 2
 Comment: The document needs to include the patch pages that were included in the partial design provided to the trustees at the October 21, 1999 meeting.
- 23) Commenting Organization: Fernald Trustees Commentor: OFFO
 Section #: Pg #: Line #: Code: C
 Original Comment #: 3
 Comment: Renaming what was referred to as "pond" and "filter wetland" in the October 21, 1999 version to "vernal pools" in the current version is unacceptable. The renaming shows a lack of understanding in the functional differences between these aspects of the design. Revise the document to the original names. Vernal pools do not function to "remove organic material from the surface water runoff." Vernal pools are areas where water temporarily pools during the winter and spring. They are located in wooded areas and provide unique breeding habitat for amphibians and macroinvertebrates. Due to their location in woods they generally have a high organic content substrate due to accumulated leaf litter.
- Filter wetland and ponds on the other hand accurately describe the function of those portions of the design. Should insufficient water be generated off the material handling area to support them as ponds and a filter wetland, then need for that function is gone and they will revert to grassland vegetation.
- 24) Commenting Organization: Fernald Trustees Commentor: OFFO
 Section #: 2.1 Pg #: Line #: Code: C
 Original Comment #: 4
 Comment: As stated in Ohio EPA's October 28, 1999 comments on the design, additional details regarding the operation of the material handling area should be provided.
- 25) Commenting Organization: Fernald Trustees Commentor: OFFO
 Section #: 2.3.3 Pg #: Line #: Code: C
 Original Comment #: 5
 Comment: We disagree with the position that the planting density proposed reaches the desired density for forest planting. Additionally we do not believe the A1P1 design nor the A8P1 Reforestation research supports the proposed planting density. However, since this a demonstration project we will accept the
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proposed densities in an attempt to assess the success of this planting density.

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- 26) Commenting Organization: Fernald Trustees Commentor: OFFO
Section #: 2.3.3.3 Pg #: Line #: Code: C
Original Comment #: 6
Comment: The section references the concept of research concerning various planting/protection methods. The original plan for A8P2 was a demonstration forest a function of which would be research. Additional detail should be provided within a research plan for evaluating the ideas presented in this section. The research plan should be included as an appendix to this design package.
- 27) Commenting Organization: Fernald Trustees Commentor: OFFO
Section #: 2.3.4 Pg #: Line #: Code: C
Original Comment #: 7
Comment: In addition to the grass seed mixture proposed for the disturbed areas, the trustees believe a forb component is necessary. The proposed savanna mixture would be appropriate for all disturbed areas.
- 28) Commenting Organization: Fernald Trustees Commentor: OFFO
Section #: 2.3.5 Pg #: Line #: Code: C
Original Comment #: 8
Comment: The purpose of this section is unclear and not well supported. The section does not provide benefit to the document and should be deleted.
- 29) Commenting Organization: Fernald Trustees Commentor: OFFO
Section #: 3.0 Pg #: Line #: Code: C
Original Comment #: 9
Comment: The grading plan should include requirements for clay lining of the ponds, filter wetland and vernal pool. A minimum of six inches of in situ or trucked in clay should be compacted to provide appropriate water retention. OSDF clay screen reject material would be appropriate for liner construction. Additionally, following certification sampling, hydric soils should be collected from the area of the former trap range and used as a vegetative layer in the ponds, filter wetland and vernal pool.
- Ohio EPA will provide inoculum pond muck similar to that used in the A1P1 wetland project. These materials successfully provided a boost to the macroinvertebrate population and vegetative community in the wetland project.
- 30) Commenting Organization: Fernald Trustees Commentor: OFFO
Section #: 3.1 Pg #: Line #: Code: C
Original Comment #: 10
Comment: Figure 3 does not show the access road very well. Figure 2 probably provides the best view but lacks a label.
- 31) Commenting Organization: Fernald Trustees Commentor: OFFO
Section #: 3.3 Pg #: Line #: Code: C
Original Comment #: 11
Comment: The vernal pool should be an elliptical shape approximately 30' long and 15" wide. Depth should vary from 1' to 4'. It is unclear from Figure 3 the proposed location but the pool should be located within the existing wooded riparian areas. A tree top/branches from removed trees should be placed
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within the completed pool to provide habitat. Buttonbush shrubs should be planted adjacent to the pool.

- 32) Commenting Organization: Fernald Trustees Commentor: OFFO
Section #: 3.4.3 Pg #: Line #: Code: C = 2800
Original Comment #: 12
Comment: The scheduling proposed for seeding is unclear. Permanent seeding should be completed in the spring of 2000 in all possible areas. Straw mulch should be certified as weed free. The research results from the A1P1 prairie revegetation strongly support the use of weed free straw.
- 33) Commenting Organization: Fernald Trustees Commentor: OFFO
Section #: 4.1.1 Pg #: Line #: Code: C
Original Comment #: 13
Comment: It appears necessary that soil amendments be applied in this area. Recommended amendments include lime for pH buffering and wood chips to reduce nutrient load.
- 34) Commenting Organization: Fernald Trustees Commentor: OFFO
Section #: 4.1.1 Pg #: Line #: Code: C
Original Comment #: 14
Comment: Decisions regarding where and what soil amendments will be used must be made during the design process. This should not be a field call. Appropriate pre-design sampling and assessments should be made to support a decision for soil amendment.
- 35) Commenting Organization: Fernald Trustees Commentor: OFFO
Section #: 4.1.8 Pg #: Line #: Code: C
Original Comment #: 15
Comment: The filter wetland and ponds should receive dormant root plantings or plugs to provide a jump start to filtering capacity and invasive control. Plants that seemed to transplant well in Ohio EPA's innoculum work in A1P1 include *Iris versicolor*, *Sparganium eurocarpum*, and *Eleocharis* spp.
- 36) Commenting Organization: Fernald Trustees Commentor: OFFO
Section #: 4.2.3 Pg #: Line #: Code: C
Original Comment #: 16
Comment: Completing erosion control work after planting is complete seems inappropriate. The likelihood of damage to planted stock seems high depending on how materials will be transported to the creek banks. It is recommended that erosion control work begin early so that heavy equipment from the earthwork might be utilized if necessary. Additionally, dormant cutting should be planted as early in the year as practical. Doing erosion control concurrently with material handling area earthwork seems most appropriate.
- 37) Commenting Organization: Fernald Trustees Commentor: OFFO
Section #: 4.2.5 Pg #: Line #: Code: C
Original Comment #: 17
Comment: Seeding with the forb/grass mixture should be completed within the 70' perimeter of the air monitor.
- 38) Commenting Organization: Fernald Trustees Commentor: OFFO
Section #: 5.1 Pg #: Line #: Code: C
Original Comment #: 18

Comment: A clear and accepted definition of survival for planted stock is necessary. Recommended language comes from the "State of Ohio Department of Transportation Construction and Materials Specifications." The following definition is proposed "Plants which have died back into the crown or beyond a normal pruning line shall be considered dead."

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- 39) Commenting Organization: Fernald Trustees Commentor: OFFO
Section #: 5.1.1 Pg #: Line #: Code: C
Original Comment #: 19
Comment: Three years is an insufficient amount of time to monitor the success of planting. A minimum of 10 years of monitoring for survival and growth is necessary. In addition to survival parameters monitored should include tip growth, DBH, and fruit production. Monitoring of these parameters could be conducted on a statistically significant, random subset of the plantings.
- 40) Commenting Organization: Fernald Trustees Commentor: OFFO
Section #: 5.1.1 Pg #: Line #: Code: C
Original Comment #: 20
Comment: The document should define the start/stop date for each year's monitoring. If the report is to be submitted August 1, when will monitoring be completed to support the report. Monitoring would seem more appropriately completed on a growing season basis (e.g. report submitted in November/December with monitoring through October)
- 41) Commenting Organization: Fernald Trustees Commentor: OFFO
Section #: 5.1.1.1 Pg #: Line #: Code: C
Original Comment #: 21
Comment: The trustees support the proposed research into deer impacts, however it is unacceptable to not replace stock lost below the 80% criteria. Replacement costs/success are a necessary component of any research for developing preferred management techniques.
- 42) Commenting Organization: Fernald Trustees Commentor: OFFO
Section #: 5.1.1.1 Pg #: Line #: Code: C
Original Comment #: 22
Comment: The 80% criteria should apply to species as well as plots. If over 20% of any given species dies then replacement should occur.
- 43) Commenting Organization: Fernald Trustees Commentor: OFFO
Section #: 5.1.1.1 Pg #: Line #: Code: C
Original Comment #: 23
Comment: Replacement to more than 80% is needed to prevent remobilization for additional replacement activities. Considering the low planting densities being utilized in this project, replacement to a minimum of 90% is necessary.
- 44) Commenting Organization: Fernald Trustees Commentor: OFFO
Section #: 5.1.1.2 Pg #: Line #: Code: C
Original Comment #: 24
Comment: Change section title to "Grasses & Forbs." Coverage is needed from the standpoint of erosion control as well as for restoration success. Immediate cover is necessary for erosion control. Whereas 90% cover by permanent grasses and forbs would not be expected by the end of the first year but by the end of the second growing season. Therefore the use of two monitoring periods, one for cover crop
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coverage and another for permanent perennial grasses and forbs is necessary.

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- 45) Commenting Organization: Fernald Trustees Commentor: OFFO
Section #: 5.1.1.3 Pg #: Line #: Code: C
Original Comment #: 25
Comment: Add Typha spp. to the list of aggressive species requiring annual control.
- 46) Commenting Organization: Fernald Trustees Commentor: OFFO
Section #: 5.2.1 Pg #: Line #: Code: C
Original Comment #: 26
Comment: A method for documenting watering activities should be developed in order to address issues relating to watering adequacy. A more formalized documentation of watering and other management activities will allow for better project evaluations and lessons learned transfer between projects.
- 47) Commenting Organization: Fernald Trustees Commentor: OFFO
Section #: 5.2.4 Pg #: Line #: Code: C
Original Comment #: 27
Comment: A burn plan for the savanna should be submitted to the trustees during the summer of 2000 for implementation in the spring of 2001 if sufficient fuel load is available to support a burn.
- 48) Commenting Organization: Fernald Trustees Commentor: OFFO
Section #: Table 8 Pg #: Line #: Code: C
Original Comment #: 28
Comment: As stated in previous comments inclusion of forbs into the proposed seed mix is necessary.
- 49) Commenting Organization: Fernald Trustees Commentor: OFFO
Section #: Table 10 Pg #: Line #: Code: C
Original Comment #: 29
Comment: Add cardinal flower and great blue lobelia to the proposed seed mix.
- 50) Commenting Organization: Fernald Trustees Commentor: OFFO
Section #: 2.3.4 Pg #: Line #: Code: C
Original Comment #: 30
Comment: Recommend that the use of legume forbs should be maximized. These forbs will serve as nitrogen fixers in the prairie ecosystems.
- 51) Commenting Organization: Fernald Trustees Commentor: DOE
Section #: 1.2.1 Pg #: 2 Line #: 18-20 Code:
Original Comment #: 1
Comment: Replace "This ditch" with "Both ditches" and move sentence to the end of the paragraph.
- 52) Commenting Organization: Fernald Trustees Commentor: DOE
Section #: 1.2.1 Pg #: 2 Line #: 22 Code:
Original Comment #: 2
Comment: Add "northern most" between "the" and "drainage."
- 53) Commenting Organization: Fernald Trustees Commentor: DOE
Section #: 1.2.1 Pg #: 2 Line #: 28 Code:

Original Comment #: 3
Comment: Replace "something" with "a flood event."

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- 54) Commenting Organization: Fernald Trustees Commentor: DOE
Section #: 1.2.2 Pg #: 2 Line #: 31 Code:
Original Comment #: 4
Comment: Replace "the site" with "A8PII."
- 55) Commenting Organization: Fernald Trustees Commentor: DOE
Section #: 1.2.2 Pg #: 3 Line #: 12 Code:
Original Comment #: 5
Comment: Add "wild grape" before "boxelder."
- 56) Commenting Organization: Fernald Trustees Commentor: DOE
Section #: 1.2.3 Pg #: 3 Line #: 24 Code:
Original Comment #: 6
Comment: Add "wetland and" between "the" and "vernal pool."
- 57) Commenting Organization: Fernald Trustees Commentor: DOE
Section #: 1.2.5 Pg #: 4 Line #: Code:
Original Comment #: 7
Comment: The design should include a more detailed discussion of the baseline habitat present in A8PII.
This baseline should be used for comparison purposes during future monitoring events.
- 58) Commenting Organization: Fernald Trustees Commentor: DOE
Section #: 1.4 Pg #: 5 Line #: Code:
Original Comment #: 8
Comment: This section should acknowledge that a multi-use forest is one of the goals for the restoration
of A8PII. The multi-use forest will provide a very diverse wildlife habitat in the early and mid stages of
succession.
- 59) Commenting Organization: Fernald Trustees Commentor: DOE
Section #: 1.4 Pg #: 5 Line #: 16 Code:
Original Comment #: 9
Comment: Replace "projects across the FEMP" with "of A8PIII."
- 60) Commenting Organization: Fernald Trustees Commentor: DOE
Section #: 2.1 Pg #: 6 Line #: 8 Code:
Original Comment #: 10
Comment: Add "and other organic material" between "woodchips" and "Generated," to ensure
consistency with other sections of the design.
- 61) Commenting Organization: Fernald Trustees Commentor: DOE
Section #: 2.2 Pg #: 6 Line #: 24 Code:
Original Comment #: 11
Comment: Add "and the installation of a wetland and vernal pool" after "corridor."
- 62) Commenting Organization: Fernald Trustees Commentor: DOE
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Section #: 2.2.2 Pg #: 8 Line #: Code:

Original Comment #: 12

Comment: The design should acknowledge that oak savannas are some of the most endangered ecosystems in the nation. A reference should be made to the U.S. EPA oak savanna website.

- 63) Commenting Organization: Fernald Trustees Commentor: DOE 2800
Section #: 2.3.2 Pg #: 9 Line #: 23-24 Code:
Original Comment #: 13
Comment: Replace "Ohio Environmental Protection Agency" with "Natural Resource Trustees."
- 64) Commenting Organization: Fernald Trustees Commentor: DOE
Section #: 2.3.3 Pg #: 9 Line #: Code:
Original Comment #: 14
Comment: Enhance this discussion to acknowledge that a multi use forest is one of the benefits of this restoration approach.
- 65) Commenting Organization: Fernald Trustees Commentor: DOE
Section #: 2.3.3.3 Pg #: 11 Line #: 5 Code:
Original Comment #: 15
Comment: Remove "of exclusion fencing and"
- 66) Commenting Organization: Fernald Trustees Commentor: DOE
Section #: 2.3.5 Pg #: 11 Line #: Code:
Original Comment #: 16
Comment: Delete or enhance this section. For instance, add information regarding when, how, and what type of volunteer species would be expected within an area.
- 67) Commenting Organization: Fernald Trustees Commentor: DOE
Section #: 3.1 Pg #: 13 Line #: 12 Code:
Original Comment #: 17
Comment: Replace "other FEMP restoration projects" with "A&P III restoration project."
- 68) Commenting Organization: Fernald Trustees Commentor: DOE
Section #: 3.1 Pg #: 13 Line #: Code:
Original Comment #: 18
Comment: Please verify that the volumes and other dimensions estimated in this section are accurate.
- 69) Commenting Organization: Fernald Trustees Commentor: DOE
Section #: 3.2.1 Pg #: 14 Line #: 15 Code:
Original Comment #: 19
Comment: Replace "shallower third pool that is designed to filter out suspended organic matter" with "shallow wetland."
- 70) Commenting Organization: Fernald Trustees Commentor: DOE
Section #: 3.4 Pg #: 14 Line #: 32 Code:
Original Comment #: 20
Comment: Replace "the fall" with "early spring."

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- 71) Commenting Organization: Fernald Trustees Commentor: DOE
 Section #: 3.4.1 Pg #: 15 Line #: 8 Code:
 Original Comment #: 21
 Comment: Replace "DOE and the other Trustees" with "The Natural Resource Trustees."
- 72) Commenting Organization: Fernald Trustees Commentor: DOE
 Section #: 3.4.2 Pg #: 15 Line #: 15 Code:
 Original Comment #: 22
 Comment: Remove the last sentence of this paragraph.
- 73) Commenting Organization: Fernald Trustees Commentor: DOE
 Section #: 4.1.1 Pg #: 16 Line #: Code:
 Original Comment #: 23
 Comment: It was stated in Section 4.1.1 of the NRRDP that lime may be required in one portion of A8PII. Please revise this section to clarify the use of soil amendments in A8PII.
- 74) Commenting Organization: Fernald Trustees Commentor: DOE
 Section #: 4.2 Pg #: 18 Line #: Code:
 Original Comment #: 24
 Comment: The possibility of delays and substitutions due to availability further emphasizes the need for nursery BOAs and other mechanisms for contract growing.
- 75) Commenting Organization: Fernald Trustees Commentor: DOE
 Section #: 4.2.3 Pg #: 19 Line #: 11 Code:
 Original Comment #: 25
 Comment: Remove "In other words."
- 76) Commenting Organization: Fernald Trustees Commentor: DOE
 Section #: 4.2.4 Pg #: 19 Line #: Code:
 Original Comment #: 26
 Comment: The possibility of delays and substitutions due to availability further emphasizes the need for nursery BOAs and other mechanisms for contract growing.
- 77) Commenting Organization: Fernald Trustees Commentor: DOE
 Section #: 5.1 Pg #: 22 Line #: Code:
 Original Comment #: 27
 Comment: Quantitative monitoring will be needed to evaluate seedling growth. At a minimum, caliper readings and tip growth should be included in the monitoring plans.
- 78) Commenting Organization: Fernald Trustees Commentor: DOE
 Section #: 5.1.1 Pg #: 22 Line #: 19 Code:
 Original Comment #: 28
 Comment: Replace "accelerate the natural succession process" with "the development of a multi-use habitat to support habitat quality enhancement."
- 79) Commenting Organization: Fernald Trustees Commentor: DOE
 Section #: 5.1.1.3 Pg #: 23 Line #: Code:
 Original Comment #: 29

Comment: wild grape has the potential to regenerate up to eight years after it has been cut or removed. This should be considered in the monitoring plans.

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- 80) Commenting Organization: Fernald Trustees Commentor: DOE
Section #: 5.1.2 Pg #: 24 Line #: 4-5 Code:
Original Comment #: 30
Comment: The monitoring period should be extended from six years to 10 years. The monitoring dates currently in the NRRDP should be replaced with the fourth, sixth, eighth, and tenth years.
- 81) Commenting Organization: Fernald Trustees Commentor: DOE
Section #: 5.1.2.1 Pg #: 24 Line #: 20 Code:
Original Comment #: 31
Comment: The monitoring dates currently in the NRRDP should be replaced with the fourth, sixth, eighth, and tenth years.
- 82) Commenting Organization: Fernald Trustees Commentor: DOE
Section #: 5.1.2.3 Pg #: 25 Line #: Code:
Original Comment #: 32
Comment: Wildlife use should be compared to the baseline survey of the area in order to qualitatively assess the use of the area as habitat.
- 83) Commenting Organization: Fernald Trustees Commentor: DOE
Section #: 5.2.2.1 Pg #: 25 Line #: 31 Code:
Original Comment #: 33
Comment: Remove "All."
- 84) Commenting Organization: Fernald Trustees Commentor: DOE
Section #: 5.2.4 Pg #: 26 Line #: Code:
Original Comment #: 34
Comment: The potential for a management commitment past 2008 should be acknowledged in the design. The NRTs are interested in the prairies being managed past 2008.
- 85) Commenting Organization: Fernald Trustees Commentor: DOE
Section #: 6.2 Pg #: 28 Line #: Code:
Original Comment #: 35
Comment: Ensure that mulch piles are managed so as to minimize fire hazards.
- 86) Commenting Organization: Fernald Trustees Commentor: DOE
Section #: Table 6 Pg #: Line #: Code:
Original Comment #: 36
Comment: Ensure that the Buffer plantings are adequately protected from deer depredation and browsing impacts.
- 87) Commenting Organization: Fernald Trustees Commentor: DOE
Section #: Pg #: Line #: Code:
Original Comment #: 37
Comment: A sign should be installed that acknowledges the work of the Trustees in the A8PII ecological restoration.