



State of Ohio Environmental Protection Agency

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George V. Voinovich
Governor

November 20, 2000

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

RE: NORTHERN PINE PLANTATION RESTORATION PROJECT

Dear Mr. Reising:

Ohio EPA has reviewed DOE's November 3, 2000 submittal, "Transmittal of the Draft Conceptual Design for the Northern Pine Plantation Restoration Project." Attached are Ohio EPA's comments which should be incorporated into future design submittals.

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: Bill Kurey, USFWS
Pete Yerace, USDOE
Jim Saric, U.S. EPA
Terry Hagen, FDF

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**CONCEPTUAL DESIGN FOR THE NORTHERN PINE PLANTATION RESTORATION
PROJECT**

1. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: General Comment Pg #: Line #: NA Code: C
Original Comment #:
Comment: As discussed during the November Trustee meeting, Ohio EPA believes it is most important to understand the soil and hydrology of the project area prior to final selection of planned habitats. Therefore, we believe a phased approach of tree removal, invasive control and drainage tile plugging/removal should be completed followed by decision making on design and habitat type selection.

- 2) Commenting Organization: Ohio EPA Commentor: DSW/OFFO
Section #: 2 Pg #: 1 Line #: NA Code: C
Original Comment #:
Comment: The 16.4 acres to be cleared is not consistent with the 19.93 acres in Attachment 1. Ohio EPA supports eliminating a majority of the northern pines due to their degrading condition. Pines selected for retention should be based upon health and the ability to create winter cover. These pines should be clumped to the greatest extent possible, focusing on reducing edge effect.

- 3) Commenting Organization: Ohio EPA Commentor: DSW
Section #: 2 Pg #: 1 Line #: NA Code: C
Original Comment #:
Comment: A baseline habitat/wildlife study should be conducted prior to clearing.

- 4) Commenting Organization: Ohio EPA Commentor: DSW
Section #: 2 Pg #: 1 Line #: NA Code: C
Original Comment #:
Comment: The wood chip staging areas shown in Attachment 2 appear to be final use area for the wood chips rather than staging areas. Although this information should be included, please include the interim storage areas for the wood chips as well. The A&PII staging area may be the best place for interim storage of the chips.

- 5) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 3 Pg #: 1 Line #: NA Code: C
Original Comment #:
Comment: Vernal pools should probably be larger than 20' X 30' but most importantly should be focused on site conditions. It maybe most advantageous for salamander populations to place one vernal pool in close proximity to the existing hardwood forest within the project area. Such a pool is likely to be colonized sooner by amphibian populations from the area.

- 6) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 3 Pg #: 2 Line #: NA Code: C
Original Comment #:
Comment: Considering the success of plugged plants in the wetland/vernal pool area of A8P2, plugged plants should be included in the design for wetland or vernal pool areas. The plugged plants in A8P2 successfully provided forage (nectar) and seed in the first year of the project. Quick establishment of preferred forbs through this method will aid in combating invasive plants.
- 7) Commenting Organization: Ohio EPA Commentor: DSW/OFFO
Section #: 3 Pg #: 2 Line #: NA Code: C
Original Comment #:
Comment: Increasing the understory density is recommended, from 90/acre to 100 to 120/acre. Increase in understory is necessary in combating invasive plants as well as providing food and cover for wildlife. Reduction in the seedling density to 300 to 350 per acre to offset the increase in shrub density would be acceptable.
- 8) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 3 Pg #: 2 Line #: NA Code: C
Original Comment #:
Comment: Based upon the hydrology of the site resulting from drainage tile plugging and removal, habitat types such as wetland, wet prairie and wet forest should be considered.
- 9) Commenting Organization: Ohio EPA Commentor: DSW
Section #: Attachment 2 Pg #: NA Line #: NA Code: C
Original Comment #:
Comment: The stockpile locations appear to be areas in which the chips will be used rather than stockpiles. Is there a more specific location for the stockpile? We have had concerns about stockpiles of wood chips and the potentially humic discharges from them. Specific locations and controls are needed to evaluate the stockpile locations.
- 10) Commenting Organization: Ohio EPA Commentor: DSW
Section #: Attachment 5 Pg #: NA Line #: NA Code: C
Original Comment #:
Comment: Recommend more "patchy" remains of pines to reduce closed off areas and therefore potentially reduce deer habitat.