



Department of Energy

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JAN 31 2001

Mr. James A. Saric, Remedial Project Manager
U.S. Environmental Protection Agency
Region V-SRF-5J
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

DOE-0295-01

Mr. Tom Schneider, Project Manager
Ohio Environmental Protection Agency
401 East 5th Street
Dayton, Ohio 45402-2911

Mr. Bill Kurey
U.S. Fish and Wildlife Services - Suite H
6950 Parkway
Reynoldsburg, Ohio 43068

Dear Mr. Saric, Mr. Schneider, and Mr. Kurey:

TRANSMITTAL OF THE RESPONSES TO THE U.S. ENVIRONMENTAL PROTECTION AGENCY AND OHIO ENVIRONMENTAL PROTECTION AGENCY COMMENTS ON THE DRAFT AREA 8, PHASE II ECOLOGICAL RESTORATION RESEARCH PLAN

- References:
- 1) Letter, J. Saric to J. Reising, "A8P2 Ecological Restoration Research Plan," dated September 1, 2000
 - 2) Letter, T. Schneider to J. Reising, "A8P2 Restoration Research Plan," dated November 20, 2000

Enclosed for your approval are responses to the U.S. Environmental Protection Agency (U.S. EPA) and Ohio Environmental Protection Agency (OEPA) comments on the draft subject plan, which serve as addenda to the Area 8, Phase II (A8PII) Natural Resource Restoration Design Plan (NRRDP).

Recent discussions among the Fernald Natural Resource Trustees (NRT) have focused on the need for a comprehensive ecological restoration monitoring plan for the Fernald site. This plan will assess the long-term progress of restored habitats through comparisons with baseline and reference site information. In addition, recent incidences of deer damage in A8PII have led the Department of Energy (DOE) to undertake a site-wide deer management plan. This plan will utilize research and monitoring of the local deer population in order to

Mr. Saric
Mr. Schneider
Mr. Kurey

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make specific management decisions at the Fernald Environmental Management Project (FEMP). The NRT have proposed that the implementation of these two site-wide plans would nullify the need for a restoration research plan specific to A8P11.

If you have any questions or require further information, please contact Johnny Reising at (513) 648-3139 or Pete Yerace at (513) 648-3161.

Sincerely,



Johnny W. Reising
Fernald Remedial Action
Project Manager

FEMP:Yerace

Enclosures:

cc w/enclosures:

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D. Carr, Fluor Fernald, Inc./2
J. Chiou, Fluor Fernald, Inc./52-0
R. Friske, Fluor Fernald, Inc./52-0
T. Hagen, Fluor Fernald, Inc./65-2
J. Homer, Fluor Fernald, Inc./65-2
M. Jewett, Fluor Fernald, Inc./52-2
G. Johnson, Fluor Fernald, Inc./64
L. McDaniel, Fluor Fernald, Inc./60
T. Patton, Fluor Fernald, Inc./76
W. Prues, Fluor Fernald, Inc./28
C. Straub, Fluor Fernald, Inc./65-2
H. Swiger, Fluor Fernald, Inc./65-2
E. Woods, Fluor Fernald, Inc./65-2
ECDC 21100/52-7

**RESPONSES TO U.S. ENVIRONMENTAL PROTECTION AGENCY
TECHNICAL REVIEW COMMENTS ON THE
DRAFT AREA 8, PHASE II ECOLOGICAL RESTORATION RESEARCH PLAN
(21100-PL-0002, REVISION A)**

FERNALD ENVIRONMENTAL MANAGEMENT PROJECT

GENERAL COMMENT

Commenting Organization: U.S. EPA

Commentor: Saric

Section #: Not Applicable (NA)

Page #: NA

Line #: NA

Original General Comment #: 1.

Comment: The plan is designed to determine deer repellent effectiveness in reducing deer browsing impacts on planted shrubs within 39 planting patches. Figure 2-1 appears to show approximately 47 separate areas, and it is extremely difficult to distinguish which areas are the 39 planting patches referred to throughout the text. Figure 2-1 should be revised to clearly depict the 39 planting patches.

Response: Construction as-built drawings will be developed for Area 8, Phase II (A8PII) and submitted to the agencies by February 15, 2001. This submittal will include a final planting plan that clearly delineates individual planting patches.

Recent discussions among the Fernald NRTs have resulted in a change to the deliverables required by the A8PII Natural Resource Restoration Design Plan (NRRDP). Instead of a research plan specific to A8PII, DOE has proposed to develop a comprehensive deer management plan for the FEMP that will include evaluations of a variety of deer control methods.

Action: Submit construction as-built drawings and develop a deer management plan for the FEMP.

SPECIFIC COMMENTS

Commenting Organization: U.S. EPA

Commentor: Saric

Section #: 2.1

Page #: 2-1

Line #: 26 and 27

Original Specific Comment #: 1

Comment: The text indicates that deer repellent will be applied by December 1, April 1, and June 1 of each year but does not indicate for how many years it will be applied. The text should be revised to indicate how many years the application and study will last.

Response: See Response to Comment No. 1.

Action: See Action to Comment No. 1.

Commenting Organization: U.S. EPA

Commentor: Saric

Section #: Figure 2-1

Page #: NA

Line #: NA

Original Specific Comment #: 2

Comment: Figure 2-1 fails to identify the meaning of the dashed lines north of the wetland areas. The figure also fails to identify the meaning of C-1, C-2, and C-3. The figure's legend indicates that a dashed and dotted line represents the "FEMP Boundary," but this line is absent from the figure. In addition, the term "Ecological" is misspelled in the figure's title. The figure should be revised to address these deficiencies.

Response: See Response to Comment No. 1.

Action: See Action to Comment No. 1.

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RESPONSES TO OHIO ENVIRONMENTAL PROTECTION AGENCY COMMENTS
ON THE DRAFT AREA 8, PHASE II ECOLOGICAL RESTORATION RESEARCH PLAN
(21100-PL-0002, REVISION A)

FERNALD ENVIRONMENTAL MANAGEMENT PROJECT

GENERAL COMMENTS

Commenting Organization: Ohio EPA
Section #: General Comment Pg. #: Line #: Commentator: OFFO
Original Comment #: 1 Code: C

Comment: Since the NRTs are in agreement that shrubs are a necessary and important component of restoration, further research on the concept of no shrub installation is not warranted. Since shrubs will be installed as a component of all future restoration projects, Ohio EPA would recommend dropping this portion of the research. Monitoring of recruitment is still a worthwhile activity as part of an adaptive management approach for this and other projects. Ohio EPA recommends replacing the research component of the project with a more detailed monitoring plan for the area which will provide information to make decisions regarding management of this and future projects. Installation of permanent monitoring transects would allow for monitoring the success of planted vegetation, recruitment and wildlife usage.

Response: Agree. DOE and the NRTs have recently discussed the need for long-term monitoring of restored habitats. Volunteer recruitment would be one of several measurement parameters for assessing the progress of ecological restoration at the FEMP.

Action: DOE will include an evaluation of volunteer recruitment into restored habitats as part of a comprehensive long-term monitoring plan for ecological restoration at the FEMP.

Commenting Organization: Ohio EPA
Section #: General Comment Pg. #: Line #: Commentator: OFFO
Original Comment #: 2 Code: C

Comment: Since DOE is planning to develop a deer management plan to address on-going deer damage, Ohio EPA would recommend incorporating aspects of this plan addressing deer control research into the deer management plan. The deer management plan should evaluate control options on a site-wide basis and could incorporate information from various areas. Evaluation of control measures should be made on a broader basis and lead to specific decision points. Though the introduction states that both controlled hunting and exclusion fencing are unacceptable to DOE at FEMP, Ohio EPA believes both should be reconsidered under the deer management plan.

Response: Agree. The deer management plan that has been proposed to the NRTs by DOE will include several evaluations of control options that lead to specific management decisions. All control options will be considered, including controlled hunting and exclusion fencing.

Action: Develop a deer management plan and submit to the NRTs.

SPECIFIC COMMENTS

Commenting Organization: Ohio EPA

Commentator: DSW

Section #: 2.1

Pg. #: 2-1

Line #: 12-20

Code: C

Original Comment #: 3

Comment: Random application of repellent to each shrub may not be as predictive as application to a group of shrubs. If an animal tastes repellent on a single shrub, it may not be inclined to attempt feeding on the neighboring shrub even if it has not been sprayed with repellent. However application to a small group of shrubs with no application on a neighboring group of shrubs may be a better indicator of efficacy of the repellent application. This would also reduce the potential effect of overspray on neighboring shrubs.

Response: Observations by DOE seem to indicate that there are two primary factors that determine the intensity of browsing. The first factor is the location of plants with respect to available cover. Second, browsing intensity appears to be species-specific. DOE feels that the random assignment of treatments across the site is the best approach to evaluate the influence of these two factors. Also, the lower density of shrub plantings in A&P II and the use of preventative measures, such as waiting for favorable (low wind) weather conditions and covering non-repellent shrubs with plastic bags during application, would minimize the effect of overspray.

If the NRTs decide that deer repellent research is worthwhile and that an alternative approach than the design discussed above would be more appropriate, then the forthcoming deer management plan will be revised as needed.

Action: Include specific methodologies for deer control evaluations in the deer management plan.

Commenting Organization: Ohio EPA

Commentator: DSW

Section #: 3.2

Pg. #: 3-1

Line #: 28

Code: C

Original Comment #: 4

Comment: Although it is stated that surveys will be conducted for at least three years, it is evident the three years will not be a long enough time to assess survival of recruits. The volunteers should be monitored until they are large enough to have survived herbivory pressures. This amount of time will vary dependent upon the species, but in no case should be three years or less.

Response: Agree. See Response to Comment No. 1 above.

Action: See Action to Comment No. 1 above.

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