



State of Ohio Environmental Protection Agency

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George V. Voinovich
Governor

February 22, 2001

FILE:
LIBRARY:

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

Re: INVASIVE PLANT CONTROL 2000 ANNUAL REPORT

Dear Mr. Reising:

Ohio EPA has reviewed DOE's January 15, 2001 submittal "Area 1, Phase 3 Invasive Species Control Study 2000 Annual Report." Ohio EPA's comments on the document are attached.

If you have any questions, please contact me.

Sincerely,

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

cc: Jim Saric, U.S. EPA
Terry Hagen, FDF
Mark Shupe, HSI GeoTrans
Francie Hodge, Tetra Tech EM Inc
Ruth Vandergrift, ODH

Ohio EPA Comments on A1P3 Invasive Species Control Study
2000 Annual Report

- 1) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Pg #: Line #: NA Code: C
Original Comment #:
Comment: As stated in Ohio EPA's comments last year, Ohio EPA recommends completion of an additional year of the vegetation survey to determine if additional plants exist but were suppressed by cattle grazing. The vegetation survey provides useful information for future restoration activities and should include a post grazing assessment. The survey could be conducted during 2000 or 2001 so assess the post grazing plant community.

- 2) Commenting Organization: Ohio EPA Commentor: DSW
Section #: Methods, Progress, and Results Pg #: 4 Line #: NA Code: C
Original Comment #:
Comment: The first paragraph states "see appendix for species list" however there is no appendix and there is no species list attached to this report, although it would be helpful to have one as stated.

- 3) Commenting Organization: Ohio EPA Commentor: DSW
Section #: Methods, Progress, and Results Pg #: 5 Line #: NA Code: E
Original Comment #:
Comment: There is a description of obtaining understory light conditions referencing Robinson and McCarthy (1999). As the 1999 Journal of the Torrey Botanical Society is not readily available, we would appreciate it if you could provide a copy of this reference.

- 4) Commenting Organization: Ohio EPA Commentor: DSW
Section #: Methods, Progress, and Results Pg #: 6 Line #: NA Code: C
Original Comment #:
Comment: The second paragraph states "...there was obvious operator error..." The frequency of operator error is not stated, and would appear to be an important condition to consider. Please give the frequency which this problem occurred.

- 5) Commenting Organization: Ohio EPA Commentor: DSW
Section #: Methods, Progress, and Results Pg #: 6 Line #: NA Code: C
Original Comment #:
Comment: The last paragraph states "The differences among blocks can be attributed to environmental heterogeneity" and appears to be significantly correlated to soil moisture content. An analysis to check this correlation should be performed, or if other factors may between blocks may be more closely correlated (e.g. pH, nutrients, light, etc) these should be discussed.