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18 APR 2001

DOE-0500-01

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

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

Mr. Bill Kurey
United States Fish and Wildlife Service, Suite H
6950 American Parkway
Reynoldsburg, Ohio 43068

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

TRANSMITTAL OF RESPONSES TO THE OHIO ENVIRONMENTAL PROTECTION AGENCY COMMENTS ON THE DRAFT CONCEPTUAL DESIGN FOR THE NORTHERN PINE PLANTATION RESTORATION PROJECT

Reference: Letter, T. Schneider to J. Reising, "Northern Pine Plantation Restoration Project," dated November 20, 2000

Enclosed for your approval are responses to the Ohio Environmental Protection Agency comments on the draft Conceptual Design for the Northern Pine Plantation Restoration Project. Upon approval, these responses will be incorporated into the Final Design which will be implemented contingent upon the rebaseline results.

18 APR 2001

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

Sincerely,

Johnny Reising

FEMP:Yerace

Johnny W. Reising
Fernald Remedial Action
Project Manager

Enclosures: As stated

cc w/enclosures:
G. Jablonowski, USEPA-V, SRF-5J
R. J. Janke, FEMP/MS45
D. Pfister, FEMP/MS45
P. Yerace, FEMP/MS45
T. Schneider, OEPA-Dayton (three copies of enclosures)
J. Homer, Fluor Fernald, Inc./MS65-2
H. Swiger, Fluor Fernald, Inc./MS65-2
E. Woods, Fluor Fernald, Inc./MS65-2
AR Coordinator, Fluor Fernald, Inc./MS78

cc w/o enclosures:
K. Chaney, EM-31/CLOV
K. Nickel, FEMP/MS45
W. Pasko, FEMP/MS45
A. Tanner, FEMP/MS45
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ECDC, Fluor Fernald, Inc./MS52-7

7

RESPONSES TO OHIO ENVIRONMENTAL PROTECTION AGENCY COMMENTS ON THE DRAFT CONCEPTUAL DESIGN FOR THE NORTHERN PINE PLANTATION RESTORATION PROJECT (21100-PL-0002, REVISION A)

FERNALD ENVIRONMENTAL MANAGEMENT PROJECT

SPECIFIC COMMENT

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

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.

Response: Agree. The project will be implemented in the following phases: drain tile location and removal; clearing and chipping/invasive species control; grading; planting. Drain tile location and plugging will occur first to allow observation of the project area hydrology. The timing of drain tile plugging, clearing, chipping, and planting will be determined by the rebaseline process.

Action: The text will be revised to indicate the above-mentioned phases.

Commenting Organization: Ohio EPA — Commentator: DSW/OFFO
Section #: 2 — Pg. #: 1 — Line #: N/A — Code: C
Original Comment #: 2

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 pine 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.

Response: Agree. The current proposal is to clear 40 percent of the Northern Pines or 16.4 acres. 19.93 acres is incorrect.

Action: Attachment 1 will be revised to show 16.4 acres.

Commenting Organization: Ohio EPA — Commentator: DSW
Section #: 2 — Pg. #: 1 — Line #: N/A — Code: C
Original Comment #: 3

Comment: A baseline habitat/wildlife study should be conducted prior to clearing.

Response: A baseline study of the Northern and/or Southern Pines will be conducted prior to clearing, consistent with the proposed monitoring and adaptive management approach.

Action: The text will be revised to reflect the implementation of a baseline study.

Commenting Organization: Ohio EPA Commentator: DSW
Section #: 2 Pg. #: 1 Line #: N/A Code: C
Original Comment #: 4
Comment: The wood chip staging areas shown in Attachment 2 appear to be final use area for the wood chips rather than staging area. Although this information should be included, please include the interim storage areas for the wood chips as well. The A8PII staging area may be the best place for interim storage of the chips.

Response: Attachment 2 reveals both interim and final staging areas. Upon clearing of pine trees, the required quantities of woodchips will be transported to designated locations on the map. Every effort will be made to stage woodchips in or adjacent to the area where they will be used. Area 8, Phase II is the only interim staging area on the map.

Action: No action.

Commenting Organization: Ohio EPA Commentator: OFFO
Section #: 3 Pg. #: 1 Line #: N/A Code: C
Original Comment #: 5
Comment: Vernal pools should be probably be larger than 20' x 30' but most importantly should be focused on site conditions. It may be 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.

Response: Agree. Vernal pools will be located based upon hydrology observations. The sizing of vernal pools will vary based upon site conditions, with 20' x 30' as the minimum size.

Action: The text will be revised to address sizing of vernal pools.

Commenting Organization: Ohio EPA Commentator: OFFO
Section #: 3 Pg. #: 2 Line #: N/A Code: C
Original Comment #: 6
Comment: Considering the success of plugged plants in the wetland/vernal pool area of A8PII, plugged plants should be included in the design for wetland or vernal pool areas. The plugged plants in A8PII 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.

Response: Agree. Plugs will be included for wetland and/or vernal pool areas.

Action: The text will be revised to include plant plugs.

Commenting Organization: Ohio EPA Commentator: DSW/OFFO
Section #: 3 Pg. #: 2 Line #: N/A Code: C
Original Comment #: 7
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.

Response: Agree. The shrub densities will be increased and the seedling densities decreased.

Action: The text will be revised to reflect the revised densities.

Commenting Organization: Ohio EPA Commentator: OFFO
Section #: 3 Pg. #: 2 Line #: N/A Code: C
Original Comment #: 8
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.

Response: Agree. Mesic and wet systems will be considered based on the resultant hydrologic regime from tile plugging.

Action: The text will be revised to include consideration of mesic and wet systems.

Commenting Organization: Ohio EPA Commentator: DSW
Section #: Attachment 2 Pg. #: N/A Line #: N/A Code: C
Original Comment #: 9
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.

Response: Locating woodchips near their final use point is by design to minimize double handling. Issues associated with humic discharge will also be evaluated in the full design.

Action: The text will be revised to address considerations associated with woodchip pile placement.

Commenting Organization: Ohio EPA Commentator: DSW
Section #: Attachment 5 Pg. #: N/A Line #: N/A Code: C
Original Comment #: 10
Comment: Recommend more "patchy" remains of pines to reduce closed off areas and therefore potentially reduce deer habitat.

Response: Agree. The removal configuration will accommodate reduction of closed off areas.

Action: The future removal rendition will be revised.