



State of Ohio Environmental Protection Agency

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November 20, 2000

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

**RE: A8P2 RESTORATION RESEARCH PLAN**

Dear Mr. Reising:

Ohio EPA has reviewed DOE's August 3, 2000 submittal, "Transmittal of the Draft Area 8, Phase II Ecological Restoration Research Plan." Attached are Ohio EPA's comments.

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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**OHIO EPA COMMENTS ON  
AREA 8, PHASE II ECOLOGICAL RESTORATION RESEARCH PLAN**

1. Commenting Organization: Ohio EPA                      Commentor: OFFO  
Section #: General Comment Pg #: Line #:              Code: C  
Original Comment #:  
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.
  
2. Commenting Organization: Ohio EPA                      Commentor: OFFO  
Section #: General Comment Pg #: Line #:              Code: C  
Original Comment #:  
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.
  
- 3) Commenting Organization: Ohio EPA                      Commentor: DSW  
Section #: 2.1 Pg #: 2-1              Line #: 12-20 Code: C  
Original Comment #:  
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

4) Commenting Organization: Ohio EPA Commentor: DSW  
Section #: 3.2 Pg #: 3-1 Line #: 28 Code: C

Original Comment #:

Comment: Although the 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.