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United States Department of the Interior

FISH AND WILDLIFE SERVICE

Ecological Services
6950 Americana Parkway, Suite H
Reynoldsburg, Ohio 43068-4132

September 3, 1998

Johnny W. Reising, Project Manager
Department of Energy
Fernald Area Office
P.O. Box 538705
Cincinnati, Ohio 45253-8705

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LOG # 2202
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FILE 5401.8

Dear Mr. Reising:

We have reviewed the Fernald "Natural Resource Impact Assessment and Natural Resource Restoration Plan" (NRRP) and offer the following comments and recommendations:

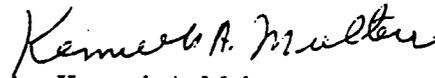
1. Each section of the document that discussed "past impacts" from contaminants of concern (COCs) should have referenced the source or suspected source of those COCs, and those sections that discussed future impacts and/or residual impacts should have mentioned how remedial actions will reduce concentrations of those COCs.
2. In Table 2-4, please include in the footnotes the formula for each of the metrics listed in the table.
3. In Table 2-5, please include in the footnotes definitions of insectivorous and foliage gleaning.
4. One of the items that you may wish to address when planting instructions are written (as referenced in Section 3.2.1 on page 3-6) is mycorrhizal fungi inoculation of the roots of trees to be planted. We understand that this speeds growth and improves health/survival of trees planted on mine reclamation sites. This technique might be useful at Fernald, especially in areas where topsoil is not present.
5. There need to be criteria for successful establishment of restoration vegetation included either in the NRRP or the specific restoration plans. These criteria should be agreed upon by the trustees as a condition for settlement of the NRDA claim. These criteria should contain monitoring instructions and specify the acceptable survival percentage after given periods of time, and corrective actions that will be taken if the criteria are not met.
6. Section 5.0, "Monitoring," is critical to the success of natural resource restoration, and the monitoring methods and standards will require agreement by the trustees as a condition for settlement of the NRDA claim. Monitoring, as well as the completion criteria mentioned in number 5 above, should be part of the NRRP, or more likely, the specific restoration plans. We were curious about the genesis of the statement in this section that "Quantitative measurements may not be necessary to measure changes over time." Not only is the origin of the statement unclear but seems inaccurate. We think it likely that quantitative measurements will be necessary.
7. In Section 7, "Institutional Controls and Future Land Use," on page 7-1 it is claimed that there will be

continued federal ownership of the FEMP. However, on page 7-2 federal ownership appears to be restricted to the disposal facility, an undefined associated buffer, and ownership "... to the extent necessary to ensure the continued protection of human health commensurate with the clean-up levels established by the remedy." This section of the NRRP does not specifically address the need for lands restored under the NRDA settlement agreement to remain in federal (DOE) ownership. If the NRRP is expected to play a role in the NRDA settlement, the retention of restored lands by the DOE, the expected acreage, and a commitment to continued management, should be clearly stated in Section 7.

The costs incurred by the Department of the Interior for past assessment of natural resources damages, as well as future costs incurred for evaluation and oversight of restorations, should be reimbursed by lump sum payments based on itemized statements of costs. Details of these reimbursements will be part of the settlement negotiation process, but not necessarily part of the NRRP.

If you have questions about our comments, or we may be of further assistance in this matter, please contact Mr. Bill Kurey of this office at 614-469-6923 ext. 14.

Sincerely,



Kenneth A. Multerer
Acting Supervisor

cc: Mike Chezik, DOI, OEPC
Frank Horvath, FWS, Region 3
Jean Sutton, Field Solicitor
Judy Gibson, Walnut Creek NWR
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