Department of Energy

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SEP 17 2001

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

DOE- 0863-01

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

Dear Mr. Saric and Mr. Schneider:

TRANSMITTAL OF RESPONSES TO OHIO ENVIRONMENTAL PROTECTION AGENCY COMMENTS AND THE REVISED 2000 ECOLOGICAL RESEARCH GRANT PROJECT ANNUAL REPORTS

References:

1. Letter, T. Schneider to J. Reising, "A8PI Revegetation Test Plots 2000 Annual Report" dated February 22, 2001
2. Letter, T. Schneider to J. Reising, "A1PI Prairie Grass Establishment Study 2000 Annual Report," dated February 22, 2001
3. Letter, T. Schneider to J. Reising, "Invasive Plant Control 2000 Annual Report," dated February 22, 2001
4. Letter, T. Schneider to J. Reising, "Comments - American Chestnut 2000 Annual Report," dated March 19, 2001

This letter transmits responses to the Ohio Environmental Protection Agency (OEPA) comments and the revised 2000 Annual Reports from the Ecological Research Grant Project being carried out pursuant to the Operable Unit 4 Dispute Resolution Agreement. Enclosed are the following revised annual reports for the following projects:

- Area 8, Phase I Revegetation Research Plots
- Area 1, Phase I Prairie Grass Establishment Study
- Area 1, Phase III Invasive Species Control Study
- Restoration of the American Chestnut Tree Study

Recycled and Recyclable

If you have any questions regarding these documents or need further information, please contact Robert Janke at (513) 648-3124.

Sincerely,

Johnny Reising

Johnny W. Reising
Fernald Remedial Action
Project Manager

FEMP:R.J. Janke

Enclosures: As Stated

cc w/enclosures:
K. Chaney, EM-31/CLOV
N. Hallein, EM-31/CLOV
T. Schneider, OEPA-Dayton (three copies of enclosures)
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cc w/o enclosures:
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L. Ludwick, Fluor Fernald, Inc./MS65-2
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T. Walsh, Fluor Fernald, Inc./MS46
E. Woods, Fluor Fernald, Inc./MS65-2
ECDC, Fluor Fernald, Inc./MS52-7

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RESPONSES TO OHIO ENVIRONMENTAL PROTECTION AGENCY COMMENTS ON THE AREA 8, PHASE I REVEGETATION PLOTS 2000 ANNUAL REPORT (21000-RP-0003, REVISION 0)

FERNALD ENVIRONMENTAL MANAGEMENT PROJECT

SPECIFIC COMMENTS

Commenting Organization: Ohio EPA Commentator: DSW
Section #: New Plantings Pg. #: 2 Line #: NA Code: E
Original Comment #: 1
Comment: Chinquapin continues to be misspelled in these documents (i.e., Chinqapin instead of Chinquapin).

Response: Agree.

Action: Revise text accordingly.

Commenting Organization: Ohio EPA Commentator: DSW
Section #: Tree Seeding Survival Pg. #: 2 Line #: NA Code: C
Original Comment #: 2
Comment: The statement is made that differences are most likely a reflection of microsite differences but no basic soil parameters have been checked (see McCarthy 2000 annual report 20900-RP-0012). This appears to be a significant omission in this report.

Response: The influence of microsite differences among the vegetation plots would be interesting to investigate. However, this task is outside the scope of work for the current research.

Action: None taken.

Commenting Organization: Ohio EPA Commentator: DSW
Section #: Recruitment Pg. #: 4 Line #: NA Code: C
Original Comment #: 3
Comment: A map is needed to locate the plot IDs in Area 8, Phase I.

Response: Agree.

Action: Add a new figure that shows plot locations and treatments.

Commenting Organization: Ohio EPA Commentator: DSW
Section #: Recruitments Pg. #: 4 Line #: Table 1 Code: C
Original Comment #: 4
Comment: Some explanation of recruitment in Plot B is needed as this plot (out of 6 plots) had the largest number of recruits (132 out of 223 or over 59%) and they were all poison ivy, locust, or grape vine.

Response: The high number of recruits within Plot B is most likely due its location, since it is surrounded on two sides by mature trees. Poison ivy, grape vine, and honey locust are all found adjacent to the plot. It is probable that they have been dispersed into the plot by birds or wind. Also, a large branch that was entangled with poison ivy fell into the

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plot in Spring 2000. Many of the poison ivy recruits were introduced at this time. Note that Plot B was mislabeled and is not correctly labeled as Plot G in the revised report.

Action: Revise text under the "Seedling Recruitment" section to include the discussion above.

RESPONSES TO OHIO ENVIRONMENTAL PROTECTION AGENCY COMMENTS ON THE AREA 1, PHASE I PRAIRIE GRASS ESTABLISHMENT STUDY FINAL PROJECT 1998-2000 (20900-RP-0011, REVISION 0)

FERNALD ENVIRONMENTAL MANAGEMENT PROJECT

SPECIFIC COMMENTS

Commenting Organization: Ohio EPA Commentator: DSW
Section #: Results and Discussion Pg. #: 3 Line #: NA Code: C
Original Comment #: 1

Comment: At the bottom of the first paragraph the statement is made "Note that the values for grass cover and weediness from the original plots are biased because the data for the low quality plots that were reseeded, are not included in the calculations." I don't understand this statement. The original plot data appears to be separated from the reseeded plot data. This being the case, I don't see how the data from one influences the data from the other. Please explain.

Response: Agree that the statement needs clarification.

Action: We reworded the statement for clarification as follows: It is not possible to compare the original and the reseeded plots because the weedy original plots were replaced. The reseeded plots, which all had wood chip mulch, were similar in quality to the best original plots that were not reseeded. We conclude that the use of wood chip mulch produces quality results no matter what amendment was originally used (new text on Pages 3 and 4).

Commenting Organization: Ohio EPA Commentator: DSW
Section #: Results and Discussion Pg. #: 3 Line #: NA Code: C
Original Comment #: 2

Comment: In the middle of the second paragraph it is stated that "Among the individual wood chip plots, plot 17, reseeded, and plot 18, original, had a high percentage of prairie grass cover and essentially no weed cover." Although the point is being made that the wood chip cover appears to be the most beneficial to suppression of weeds and allowing prairie grasses to dominate (as evidenced by Figure 4a), plot 18 is shown on Figure 4 to have no mulch.

Response: Figure 4 is incorrect due to a data sorting mistake. The statement "Among the individual wood chip plots, plot 17, reseeded, and plot 18, original, had a high percentage of prairie grass cover and essentially no weed cover" is correct.

Action: Figure 4 has been revised.

Commenting Organization: Ohio EPA Commentator: DSW
Section #: Results and Discussion Pg. #: 3 Line #: NA Code: C
Original Comment #: 3

Comment: In the middle of the second paragraph it is stated that "Presumably, the high success rate resulted from the protective action of the wood chips and lack of an amendment that contains weed seeds." A series of bar charts showing just the wood chip mulch plots separated by amendment to illustrate this would be a welcome addition.

Response: When we sorted out the plots into wood chips alone, mulch with wood chips, and amendments alone, there are so few plots in each category that the statistical validity of the data for the small groups is in doubt. The averages however do show the value of wood chip mulch despite the low number of plots (Table 4, Page 9).

Treatment	Average Weeds
Wood chips (Alone)	1.33
Wood chips w/ Amendment	1.63
Amendment (Alone)	3.13

The reason for the low number of plots in the Wood (Alone) and the Amendment (Alone) categories is due to the reseeding in Spring of 1999. Of the original wood plots 33 percent required reseeding in comparison with the 62.2 percent of the original amendment plots that required reseeding.

Action: Explanation above was added to text (Page 3/4).

Commenting Organization: Ohio EPA Commentator: DSW
Section #: Results and Discussion Pg. #: 3 Line #: NA Code: C
Original Comment #: 4

Comment: In the third paragraph it is stated that "...the composted sludge had the highest weed coverage" and in the preceding paragraph that "...the plots with straw had the lowest establishment of prairie grass, likely due to weed dominance." Did the plots with the composted sludge and the straw mulch have the highest weed content of all the plots?

Response: Yes the composted sewage sludge and straw did have the highest weed content. The number of plots reseeded is a measure of weediness. In the fall of 1998 the plots that were very weedy were reseeded. Of the straw plots 100 percent were weedy and reseeded. The two straw plots that have not been covered with wood chips should have been, but were overlooked by mistake. Of the composted sewage sludge 67 percent were reseeded. Tables 3 and 4 show the success rate of the original plots. The high reseeding proportion shows the poor results for these straw and sewage sludge plots.

Action: None.

Commenting Organization: Ohio EPA Commentator: DSW
Section #: Results and Discussion Pg. #: 3 Line #: NA Code: C
Original Comment #: 5

Comment: In the end of the third paragraph it is stated that "...amendments are likely a source of weeds." Although this is true, is it possible that the enrichment of the soil with nutrients favors weed growth over prairie grass growth?

Response: We do not have an experimental design to show that on these plots the amendments are specifically the cause of the introduction of weeds or if it is the high nutrient levels.

Action: None.

Commenting Organization: Ohio EPA Commentator: DSW
Section #: Results and Discussion Pg. #: 3 Line #: NA Code: C
Original Comment #: 6
Comment: There is no discussion of the oat vs. no oat cover in the final report. There should be some information about these treatments.

Response: Oats were planted as a cover crop, but due to poor germination of the oats as a result of the drought the summer following planting, the oats did not provide the cover expected. We combined the results for the oats and no oats.

Action: Above explanation was added to text (Page 1).

Commenting Organization: Ohio EPA Commentator: DSW
Section #: Conclusions Pg. #: 4 Line #: NA Code: C
Original Comment #: 7
Comment: It is stated "Note, however, the level is biased high because the unsatisfactory plots were reseeded and the data of these plots did not contribute to the averages." The meaning of this is not clear to me (as indicated above). Please explain.

Response: Refer to text from Response to Comment #1.

Action: None.

Commenting Organization: Ohio EPA Commentator: DSW
Section #: Tables 1-3 Pg. #: 8 and 9 Line #: NA Code: C
Original Comment #: 8
Comment: The lower sections of these tables under "Initial Degree of Establishment" are not clear and I wonder if some of the labeling is not correct. Please explain.

Response: The tables show the successful establishment of the individual treatments from the original planting (Pages 8 and 9).

Action: The tables have been modified to read "Successful Degree of Establishment from Original Seeding".

Commenting Organization: Ohio EPA Commentator: DSW
Section #: Photographs Pg. #: Line #: NA Code: C
Original Comment #: 9
Comment: Many of the labels along the upper and right side edges have been cut off and the numbers do not appear.

Response: The original photographs given to Craig have the entire label included on the picture. In photocopying the pictures the labels may have been cut off.

Action: The photos have been corrected so that all of the information on the labels is present.

RESPONSES TO OHIO ENVIRONMENTAL PROTECTION AGENCY COMMENTS ON THE AREA 1, PHASE III IDENTIFICATION AND CONTROL OF INVASIVE PLANT SPECIES 2000 ANNUAL REPORT (20900-RP-0012, REVISION 0)

FERNALD ENVIRONMENTAL MANAGEMENT PROJECT

SPECIFIC COMMENTS

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

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 to assess the post grazing plant community.

Response: It is agreed that Fluor Fernald, DOE, and the Trustees may want to discuss the collection of additional data on vegetative progression of post grazing fields; however, this work would be outside the scope of the current contract with Ohio University. If it is determined that additional research data is desired, then funds may need to be allocated to meet any cost of further work, as negotiated with Ohio University.

Action: Time will be set aside in future Trustee meetings to discuss conducting further vegetative surveys and to identify a path forward.

Commenting Organization: Ohio EPA Commentator: DSW
Section #: Methods, Progress, and Results Pg. #: 4 Line #: NA Code: C
Original Comment #: 2

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.

Response: The species list is the taxa list from the 1999 Annual Report. A copy of that list is available to place as an appendix within the report.

Action: Fluor Fernald will add taxa list to revised 2000 Annual Report as appendix.

Commenting Organization: Ohio EPA Commentator: DSW
Section #: Methods, Progress and Results Pg. #: 5 Line #: NA Code: E
Original Comment #: 3

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.

Response: The Ohio University has provided reprints of the referenced article to Fluor Fernald.

Action: A copy of the reprint will be made available with the comment responses.

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Commenting Organization: Ohio EPA Commentator: DSW
Section #: Methods, Progress, and Results Pg. #: 6 Line #: NA Code: C
Original Comment #: 4

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.

Response: Stems less than ¾-inch in diameter at the base cannot be satisfactorily injected using this system. By design of the experiment, all stems were injected (or attempted to do so) even if they were below the threshold size. In future eradication efforts, these small stems should be cut manually and herbicide applied to the stump. Virtually all of the error resulting from this treatment is restricted to just the small stems.

Action: Change wording to:
"This is slightly different from appearances in the field, because misapplied injection treatments were not counted (i.e., when there was obvious operator error because the stem was too narrow to be injected or the capsule did not make solid contact and glanced along the edge it was not counted). Misapplied injections are largely restricted to just the smallest diameter stems (< 3/4 inch)."

Commenting Organization: Ohio EPA Commentator: DSW
Section #: Methods, Progress, and Results Pg. #: 6 Line #: NA Code: C
Original Comment #: 5

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.

Response: As requested, Ohio University ran correlation analysis for the blocks (N = 8) using mean survival vs. the mean for each of the four environmental parameters (light, pH, nitrate, and moisture). All $r > 0.5$ and $P > 0.1$. There is too much variation at the level of block to sift this out because this includes the data for all three treatments. However, if you do a 1 df F-test comparison grouping the blocks (1-5 vs. 6-8) there are significant differences in pH and light alone.

Action: Ohio University will attempt to do a more extensive statistical analysis examining possible interactive effects for the 2001 Annual Report. They plan to have a manuscript ready for review in a peer-reviewed journal at that time.

RESPONSES TO OHIO ENVIRONMENTAL PROTECTION AGENCY COMMENTS ON THE RESTORATION OF AMERICAN CHESTNUT TREE PROJECT 2000 ANNUAL REPORT (20900-RP-0013, REVISION 0)

FERNALD ENVIRONMENTAL MANAGEMENT PROJECT

GENERAL COMMENTS

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

Comment: A number of deviations to the original approved work plan have occurred over the past two years without sufficient documentation of the changes. The report should be revised to clearly define what has been planted in detail within the project area. This should include a table of data described below and a figure showing planting locations. Additionally, it is obvious the researchers need to review the original work plan to see how vegetation maintenance and herbivory control were supposed to be carried out.

Response: It is acknowledged that a number of unforeseen changes have taken place since the approval of the initial task order. However, the goal of the project remains the same – to establish a blight resistant stand of hybrid American Chestnut trees at the Fernald site. The original work plan called for the entire area to be cleared of vegetation prior to planting. The area was mowed, Roundup was applied, and the entire area was mulched prior to planting. Researchers and Fernald site employees have hand-weeded the trees on several occasions, and herbicide will be used in 2001 in an attempt to manage the weed problem.

Action: Revise the text to include the information summarized above. A detailed map of the surviving trees will be generated and presented next year's annual report.

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

Comment: In general, the report is poorly written. There are grammatical and word usage errors, and in general appears to be facile.

Response: Comment acknowledged.

Action: Revise text to make editorial corrections and to include additional information resulting from comment responses.

SPECIFIC COMMENTS

Commenting Organization: Ohio EPA Commentator: DSW/OFFO
Section #: Pedigree of plantings Pg. #: 1 Line #: NA Code: C
Original Comment #: 3

Comment: Each report should include information about the make up of the hybrids (e.g., OPCL 53 7/8ths pure American Chestnut) and include both scientific and common names of the trees. (e.g., American Chestnut, *Castanea dentata)*. A table listing vendor, identification code, purity, scientific and common name, seed/seedling, number planted, location and date planted should be included.

Response: Agree. All of the chestnut hybrids planted to date are 7/8ths pure American Chestnut.

Action: Revise text to include the information requested above.

Commenting Organization: Ohio EPA Commentator: DSW
Section #: Planting time and methods Pg. #: 1 Line #: NA Code: C
Original Comment #: 4

Comment: The statement is made that "Though planting in the fall can risk freeze killing of the seeds, no difference in the germination of survival was discerned between the two plantings. Therefore, the remainder of the report will be concerned with the types themselves, not the time of planting." It seems premature to lump all the plants together at this early stage and prudent to keep the Fall and Spring plantings distinct so that growth and later survival comparisons can be made between the two groups.

Response: The American Chestnut Foundation has previously done growth and survival comparisons of spring vs. fall planted seeds. They found no long-term differences to exist after initial germination and establishment. The Foundation suggested planting half of the nuts in the Fall and the other half in the Spring only as a way to ensure germination. A particularly cold winter (like 2001) would have killed most of the fall planted seeds, but luckily the winter of 2000 was reasonably mild. No follow-up studies are warranted at this time.

Action: None required.

Commenting Organization: Ohio EPA Commentator: OFFO
Section #: Planting time and methods Pg. #: 1 Line #: NA Code: C
Original Comment #: 5

Comment: The text states that "6-8 inches of mulch was used to cover" the seeds and seedlings in the fall, then removed in the spring. The text isn't clear on whether new mulch was reapplied in the spring. Please clarify.

Response: Additional mulch was not applied in the spring of 2001 since the coarse mulch applied the previous Fall had not yet decomposed.

Action: None required.

Commenting Organization: Ohio EPA Commentator: DSW
Section #: Planting time and methods; Recommendations and 2001 plans Pg. #: 1 Line #: NA Code: E
Original Comment #: 6
Comment: The word "detour" is used where it is assumed "deter" is intended.

Response: Agree.

Action: Revise text accordingly.

Commenting Organization: Ohio EPA Commentator: DSW
Section #: Germination and survival Pg. #: 1 Line #: NA Code: C
Original Comment #: 7
Comment: The statement is made that "Due to the tall grass and other herbaceous plants in the plot (ranging up to six feet in height), sixteen percent of seeds and seedlings could not be located." The original work plan called for the seedlings to be measured monthly during the growing season and "Competing weeds will be removed mechanically, chemically and/or by hand to maximize opportunities for survival. Weeding will be needed for several years, until seedlings overtop competing weeds. Seedlings will also be protected from deer and small mammals through the use of repellent sprays and/or fencing." It appears as though the control of competing weeds was not carried out as originally planned and as a result the seedlings could not be located. It is recommended that the control of herbaceous vegetation be carried out as originally planned, better marking of seeds and seedlings occur, and appropriate control for herbivory applied.

Response: Weeds will be more aggressively controlled in order to ensure optimal conditions for growth within the Chestnut plot. A new, sturdier deer exclosure fence is being installed in order to control herbivory

Action: Implement weed control and install a 10-foot welded wire fence around the Chestnut plot.

Commenting Organization: Ohio EPA Commentator: DSW
Section #: Germination and survival Pg. #: 1 Line #: NA Code: E
Original Comment #: 8
Comment: It appears as though the last two sentences are meant to be a single sentence. The last sentence has no verb. Perhaps it was intended to read "...was seventy-five percent with hybrid type..."

Response: Agree.

Action: Revise text accordingly.

Commenting Organization: Ohio EPA Commentator: DSW
Section #: Germination and survival Pg. #: 1 Line #: NA Code: C
Original Comment #: 9

Comment: The fence installed was not the same as described in the original statement of work. The fence originally was described as follows: "Fencing will consist of six-foot high woven wire 'poultry fence,' with two strands of wire installed above. For increased visibility, ribbons will be attached to the wire strands. Miami University has demonstrated success with this type of fencing in the past." The fencing used was what is typically referred to as deer fence. We noticed it broken into by deer and it appeared to have been that way for some time. Frequent inspection, improved fencing, and wire cages around smaller seedlings seem warranted.

Response: The original deer fence installed was not effective in exclosing deer from the Chestnut plot. Therefore, a stronger exclosure fence will be installed in 2001. The new exclosure fence will consist of two sections of welded wire fencing attached to 10-foot wooden posts. The Ohio Department of Natural Resources states that this design is the most effective alternative for exclosing deer from an area.

Action: Install the fence in Spring 2001.

Commenting Organization: Ohio EPA Commentator: DSW
Section #: Recommendations and 2001 plans Pg. #: 2 Line #: NA Code: C
Original Comment #: 10

Comment: We have never been in favor of inoculating the seedlings with the pathogen. We feel that introduction of the fungus to the area is not prudent and that establishing the chestnuts is paramount to infecting the young trees as a test.

Response: The goal of the project is to establish blight resistant chestnut trees at the Fernald site while also providing the American Chestnut Foundation with information concerning the resistance level of the genetic lines being tested. Growing chestnut trees in an area that may possibly be free of the pathogen does not provide the opportunity to test resistance. Inoculation of the fungus will kill a substantial number of the seedlings, but the ones that survive are resistant and will not eventually succumb to the blight. The fungus responsible for the blight can remain dormant in the soil for decades. There is a good chance that it is already present in the soil at Fernald site. The chestnut blight has also been reported in the Cincinnati area, so it is likely that it would eventually find its way to the Fernald site.

Action: None required.

Commenting Organization: Ohio EPA Commentator: OFFO
Section #: Recommendations and 2001 plans Pg. #: 2 Line #: NA Code: C
Original Comment #: 11

Comment: What kind of "fabric mat" is going to be effective in controlling the described weed problems? Landscape fabric is most effective where no existing perennial vegetation exists. The vegetation described would seem to be perennial vegetation which will simply push the matting up. This is typical of seeding fabric and often results in significant maintenance problems that will likely impact the seedlings.

Response: Fabric mats could prove effective if applied after exsisting vegetation is killed with Roundup. Mulching, hand weeding, multiple applications of herbicide, and/or the use of fabric mats will all be implemented to some extent in order to control weeds around the chestnut seedlings.

Action: None required.

Commenting Organization: Ohio EPA Commentator: DSW
Section #: Recommendations and 2001 plans Pg. #: 2 Line #: NA Code: C
Original Comment #: 12
Comment: Will the seedlings become more or less restricted by competition as the seedlings gain height.

Response: As the seedlings grow, the impact of the herbaceous vegetation will be reduced. The chestnut seedlings will eventually shade out most of the sun-loving weeds that are currently present in the area.

Action: None required.

Commenting Organization: Ohio EPA Commentator: DSW
Section #: Recommendations and 2001 plans Pg. #: 2 Line #: NA Code: C
Original Comment #: 13
Comment: Control of the herbaceous vegetation should have been occurring already. This should not be delayed contingent upon deer fencing as getting that installed on site could take a prohibitively long time and weeds could become well established again. Weed control should begin immediately. Frequent visits with other controls (maintaining existing controls, wire cages, repellent applications) should continue until the fence is installed.

Response: Until the fencing is installed, the existing vegetation may actually be protecting the chestnut seedlings from deer herbivory, since they are much harder to see. The fencing is expected to be installed by June 2001. At that time, weeding around seedlings will occur.

Action: None required.

Commenting Organization: Ohio EPA Commentator: OFFO
Section #: Recommendations and 2001 plans Pg. #: 2 Line #: NA Code: C
Original Comment #: 14
Comment: The restoration of the American Chestnut project would also benefit significantly from a Fernald deer management plan.

Response: Agree.

Action: None required.