



State of Ohio Environmental Protection Agency

4070

Southwest District Office

401 East Fifth Street
Dayton, Ohio 45402-2911

TELE: (937) 285-6357 FAX: (937) 285-6404

Bob Taft, Governor
Maureen O'Connor, Lt. Governor
Christopher Jones, Director

FERNALD

FILED: 01/08/02 10:55 AM
JAN 10 P 12:25

FILED: C-0522

January 8, 2002

Mr. Johnny Reising
U.S. DOE FEMP
P.O. Box 398705
Cincinnati, OH 45329-8705

RE: FERNALD ENVIRONMENTAL MANAGEMENT PROJECT SITE DEER MANAGEMENT PLAN

Dear Mr. Reising:

Ohio EPA has reviewed the Fernald Environmental Management Project Site Deer Management Plan, 20900-PL-0001 Rev. A Draft, submitted by DOE on November 30, 2001. Ohio EPA's comments are enclosed.

If there are any questions, please contact me at (937) 285-6466 or Donna Bohannon at (937) 285-6453.

Sincerely,

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

- cc: Jim Saric U.S. EPA
- Terry Hagen, Fluor Daniel Fernald
- Francis Hodge, Tetratech
- Ruth Vandegrift, ODH
- Mark Schupe, HSI Geotrans

1

FERNALD ENVIRONMENT MANAGEMENT
PROJECT SITE DEER MANAGEMENT PLAN
November 2001

Comments:

1. Commenting Organization: Ohio EPA Commentor: DSW
Section #: 2.2.5 Pg. #: 2-3 Line #: 2 Code: C
Original Comment #:
Comment: The statement is made that "wetland plants" were damaged. Does this include all wetland plants including plugs (e.g. of sedges), trees and shrubs; or just trees and shrubs; or just trees or just shrubs? Please clarify.

2. Commenting Organization: Ohio EPA Commentor: DSW
Section #: 2.3 Pg. #: 2-4 Line #: 5-8 Code: C
Original Comment #:
Comment: Please elaborate on costs, the brief statement that \$6,240 are 4% of total damage needs clarification (e.g., on what is the \$6,420 based, what is meant by representing 4% of damage, what is the estimate of costs in terms of ecological damage, etc.)

3. Commenting Organization: Ohio EPA Commentor: DSW
Section #: 3.0 Pg. #: 3-1 Line #: 9 Code: E
Original Comment #:
Comment: Delete the word "in."

4. Commenting Organization: Ohio EPA Commentor: DSW
Section #: 3.1 Pg. #: 3-1 Line #: 19-23 Code: C
Original Comment #:
Comment: In the previous sections, statements are made indicating the density of deer not to be a local phenomenon, but related to an areal extent larger than the site (e.g., p1-3, lines 22-25; p2-1, lines 7-11). It does not seem reasonable to attribute browsing differences to density differences from one part of the site to another due to the relatively small size of the site and the transient nature of the deer.

5. Commenting Organization: Ohio EPA Commentor: DSW
Section #: 3.1 Pg. #: 3-1 Line #: 27-29 Code: C
Original Comment #:
Comment: One of the goals of the patches in Area 8 PII was to evaluate different deer repellents. Is there any result from this or other comparison study of different repellents? Please explain the strategy of testing different repellents (i.e., effectiveness vs. cost).

Ohio EPA Comments Deer Mgmt Pl

January 8, 2002

Page 2

6. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 3.1 Pg. #: 3-1 Line #: 27-29 Code: C
 Original Comment #:
 Comment: What is the time frame of effectiveness in regards to the odor repellents vs. taste repellents? If there are differences, could they possibly be used as a measurement to determine a comparison between the two repellents?
7. Commenting Organization: Ohio EPA Commentor: DSW
 Section #: 3.0 Pg. #: 3-1 Line #: 11 Code: C
 Original Comment #:
 Comment: This states that two options are discussed (i.e., tubes and repellents) when three are actually included (exclosure).
8. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 4.1.1 Pg. #: 4-1 Line #: Code: C
 Original Comment #:
 Comment: The section fails to address the fact that DOE successfully implements regulated deer hunting on a number of other facilities. These facilities occur within Ohio and other states. These facilities carry out similar missions to Fernald including remote area monitoring, and are able to implement controlled hunting.

Additionally, it is unclear how the problems suggested (e.g., movement of wounded animals off-site, noise, etc.) are addressed in the support of adjacent property hunting. Also, no discussion of regulated hunting with bow and arrow is included.

Ohio EPA concurs with the reports conclusion that hunting is an effective tool for managing deer heard size. Therefore we believe that on-site as well as off-site controlled hunting is an appropriate method for managing deer damage in restoration projects.

9. Commenting Organization: Ohio EPA Commentor: DSW
 Section #: 4.2 Pg. #: 4-2 Line #: 22 Code: C
 Original Comment #:
 Comment: The statement is made that "Electric fencing is an ideal solution to keep out deer." This is a overstatement and should be modified/eliminated. It is not yet known if electric fencing will be effective at the site (see section 5.4). Apple orchardists in the northeast generally use 10' exclusion fences around their orchards rather than electric fencing, indicating exclusion fencing to be superior to electric fencing. To state that electric fencing is a suitable alternative, rather than an ideal solution seems more

Ohio EPA Comments Deer Mgmt Pl

January 8, 2002

Page 3

appropriate.

10. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 4.2 Pg. #: 4-2 Line #: 27 Code: E
 Original Comment #:
 Comment: Should the word "effective" in this sentence be changed to "electric?"
11. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 4.3 Pg. #: 4-3 Line #: Code: C
 Original Comment #:
 Comment: The Deer Management Plan does not clearly state DOE's position regarding the relocation of deer. Please clarify.
12. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 4.4 Pg. #: 4.3 Line #: Code: C
 Original Comment #:
 Comment: Please clarify whether DOE will or will not implement the option of providing supplemental food for deer control. Ohio EPA believes that an additional food source for deer will only attract deer to the Fernald property.
13. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 5.1 Pg. #: 5-1 Line #: 10 Code: C
 Original Comment #:
 Comment: For clarification, please include the "type" of repellent being discussed in this first sentence.
14. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 5.2 Pg. #: 5-1 Line #: Code: C
 Original Comment #:
 Comment: In what areas on site and in what time frame will the systemic repellent be used at Fernald? Have any studies shown whether the systemic repellent works better on certain plants? Please include this information in the text.
15. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 5.3 Pg. #: 5-1 Line #: 23 & 27-29 Code: E
 Original Comment #:
 Comment: This paragraph needs clarification. Instead of stating that "support should" be given to local landowners for obtaining depredation permits and then discussing the fact that DOE and FF already support the idea, simply state "Support is provided,"

4

etc.

16. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 5.4 Pg. #: 5-2 Line #: 3 & 8 Code: E
Original Comment #:
Comment: Please replace "should" and "would" in these two sentences with "will."
17. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 5.4 Pg. #: 5-2 Line #: Code: C
Original Comment #:
Comment: In what areas on site will the electric fence be used? What type of approach is DOE planning? Are there studies that possibly provide a "best" method of application?
18. Commenting Organization: Ohio EPA Commentor: DSW
Section #: Figures Pg. #: Figure 2 Line #: Code: E
Original Comment #:
Comment: Legend for figure 2 refers to A1PI rather than A8PII.