

**RESPONSES TO  
OHIO ENVIRONMENTAL PROTECTION AGENCY  
COMMENTS ON THE  
FORMER PRODUCTION AREA  
NATURAL RESOURCE RESTORATION DESIGN PLAN  
REVISION A, DRAFT**

**FERNALD CLOSURE PROJECT  
FERNALD, OHIO**

**JANUARY 2005**

**U.S. DEPARTMENT OF ENERGY**





wetland, SWU). In other sloped areas more prone to sheet flow, coir or jute matting will be utilized as specified.

Action: None required.

8. Commenting Organization: Ohio EPA Commentor: DSW  
 Section #: 3.4 Pg. #: 3-3 Line #: NA Code: C  
 Specific Comment #: 8  
 Comment: Please add to this section that straw mulch will be placed at 2-3 tons per acre. This should be done following the specification in 3.3 D.2.h of 02930, Seeding/Erosion Control. Because of the drying nature of the wind on the site, application of mulch should occur regardless of seeding method. This should increase seed germination and seedling survival.  
 Response: Straw mulch will be applied per the requirements of Specification 02930. Where seeding occurs through use of the seed drill, straw mulch will not be applied. This has been the practice at the site throughout the restoration process and is consistent with the requirements of 02930.  
 Action: None required.
9. Commenting Organization: Ohio EPA Commentor: DSW  
 Section #: 3.5 Pg. #: 3-3 Line #: NA Code: C  
 Specific Comment #: 9  
 Comment: The statement is made that "Monitoring of other restoration projects has demonstrated that amenities increase wildlife use" and references the 2003 Consolidated Monitoring Report. I have been checking the monitoring report for these types of information and have not seen any data or narrative describing uses of wildlife amenities in the 2003 Consolidated Monitoring Report. I am confident that the statement is true, but data should be available to verify that and either include the different types that are planned for Area 3B or make reference to the specifications.  
 Response: Each year the monitoring report contains a list of wildlife species observed in the A1PI Wetland. Through casual observations during monitoring, there is clear evidence that wildlife species do use amenities constructed in the project. There is no data that has been collected to support the observation. The referenced statement is derived from the observed increase in wildlife use of areas like the A1PI wetland, coupled with the casual observation of amenity use, leading to the conclusion that the amenities are promoting wildlife use to some degree.  
 Action: None required.
10. Commenting Organization: Ohio EPA Commentor: DSW  
 Section #: 02930 Pg. #: 7 of 9 Line #: 3.3 D.2.h Code: C  
 Specific Comment #: 10  
 Comment: The placement of straw mulch at 2-3 tons per acre as specified here should apply regardless of seeding method because of the drying winds on the site. This should increase seed germination and seedling survival.  
 Response: See response to Comment #8.  
 Action: None required.
11. Commenting Organization: Ohio EPA Commentor: DSW  
 Section #: Table 3-2 Pg. #: 3-4 to 3-6 Line #: Bottom Code: C  
 Specific Comment #: 11  
 Comment: The plug for giant burreed is listed here. The plants that we have brought on site from the reference wetland have been *Sparganium americanum* the American Burreed, rather than *Sparganium eurycarpum*. In addition to being found locally, the American Burreed has a coefficient of conservatism of 6 versus a 4 for the giant burreed (Andreas B. K., John J. Mack,



