Alameda, CA 94501-3959

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ALAMEDA POINT
SSIC NO. 5090.3

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Re: Ecological Risk Assessment: Terrestrial Scoping Assessment & Threatened and Endangered Species Survey Draft, PRC 4/3/95

The workplan is rather vague about what is to be accomplished. In the interests of good project management, I suggest that a "boiler-plate" of the tables expected from the final report be included in the workplan. (For example, the contaminant pathway schematics that were included in the Baseline Human Health Risk Assessment Workplan display some important assumptions). Information required for the phase I workplan and data that is already available could be indicated. This approach would focus attention on the questions that need to be addressed by the scoping workplan.

State guidance (1) lists the scoping goals as identifying the following:
habitats, potential receptors, potential contaminants of concern, and potentially complete exposure pathways.

Habitats

A variety of habitats have been identified (2): open-water of San Francisco bay, breakwaters, rip-rap, beaches, pier, tidal wetlands, permanent brackish wetlands, seasonal wetlands, ruderal (weedy) areas, open grasslands, trees near the shooting range, and urban cultivated areas. Please confirm whether

1. San Francisco Bay is only to be considered in the "aquatic" portion of the ecological assessment and is the only habitat excluded from this scoping work;
2. the seasonal wetlands have been delineated yet results are unpublished.
3. the habitat list of appendix A will be expanded to include the cultivated urban areas that were not included in the preliminary fauna list (2) and to distinguish between types of wetlands.

Potential Receptors

The "Table of Threatened and Endangered Species Expected to Occur at NAS Alameda" Appendix B of the scoping workplan omits the California least tern, the western snowy plover, the American peregrine falcon, the Canadian goose, the western aquatic garter snake, and the salt marsh harvest mouse although listed in App. A.

Appendix A did not include the double-crested cormorant of Appendix B.

What is the significance of excluding species from Appendix A such as the black-crowned night heron and willet which have been observed at NAS Alameda (2)?

It would have been helpful to have had access to the "Least tern buffer zone study" commissioned of Dr. Caffrey by the Navy's EFC-west for this workplan to document if habitats other than the grasslands are important for providing alternative prey or cover for predators of the tern chicks.

It has been suggested by biologist Laura Collins that least tern eggs could be collected early in the nesting season with little damage to the colony's fledgling production for contaminant analysis. Has any consultation occurred on this point to accelerate the overall ecological assessment process?

"Species of special concern" are given emphasis in selection of potential receptors for follow-on work and it would be helpful to include them in any subset particularly since the requirements of some, such as the loggerhead shrike, do not overlap those of the threatened

or endangered list.

Please confirm whether the assessment endpoints will be protection of biological resources selected primarily from the list of special species.

Please confirm whether population distributions will be considered in determining the sensitivity of species to contamination which may be particularly important for long-lived species such as the terns. This information could be included in the "natural history data" of App. B.

Potential Contaminants

Pesticides, herbicides and PCB's should receive particular emphasis as thresholds for noticeable deleterious effects are lower for wildlife than humans.

Please confirm that the existing IR data base will be used.

The determination of background values that reflect Alameda Island vs NAS Alameda or other fill or industrial site has not been documented. This may hamper the proper selection of contaminants, especially metals, for consideration.

Potentially Complete Exposure Pathways

Soil gas exposure to burrowing owls is a particular concern.

Please confirm that pathways are assumed to be complete unless shown otherwise.

Significance of Findings

There is no detailed plant survey of NAS Alameda to my knowledge.

The effort to confirm the existence of the salt marsh harvest mouse in consultation with U. S. Fish and Wildlife Service is commendable.

The workplan suggests that field observations will be used to "improve" the potential receptor list (pg 6). I support Tom Okey's comments about the problem of false negatives resulting from the brief field observations as planned. It is very difficult to prove the absence of a species and is not necessary for the follow-on work. Follow-on work may focus on sensitive expected receptors suggested by the habitat.

Summary

I hope that the acceleration opportunities of proceeding to a Phase I workplan which have been made possible by the work of Laura Collins, Leora Feeney, Golden Gate chapter of the National Audubon Society and others as well as the IR sampling data set will not be overlooked.

Thank you for this opportunity to comment.

Sincerely,

Roberta Hough

Roberta Hough
NAS Alameda RAB

(1) draft California "Guidance for Ecological Risk Assessment at Hazardous Waste Sites and Permitted Facilities Part B: Scoping Assessment" of September 1994, DTSC.

(2) "Partial Lists of Mammals, Reptiles, Birds and Fishes of the Naval Air Station, Alameda" 10/1993, R. L. Feeney and L. D. Collins.