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ALAMEDA POINT
SSIC NO. 5090.3

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

VIA FACSIMILE

19 MAY 1995

Ms. Teresa Bernhard
Project Manager
Naval Air Station Alameda
250 Mall Square
Alameda, California 94501-5000

Re: U.S. Environmental Protection Agency Review Comments - WORK PLAN, ECOLOGICAL RISK ASSESSMENT: TERRESTRIAL SCOPING ASSESSMENT AND THREATENED AND ENDANGERED SPECIES SURVEY, DRAFT, APRIL 3, 1995

Dear Ms. Bernhard:

The U.S. Environmental Protection Agency (EPA) has completed its review of the subject draft work plan. This work plan outlines the approach to developing two reports: 1) the Terrestrial Scoping Assessment; and 2) a Threatened and Endangered (T&E) Species Report. The Agency has determined, that in general, this work plan is acceptable. However, our specific comments, which are discussed below, address concerns which warrant further clarification and/or recommend modification of the scope to incorporate aspects which appear to be omitted. Specifically, EPA's specific review comments focus on issues of scope and methodology, and the potential implications for future use scenarios relative to specific site environmental conditions.

The subject documents that will present the results of the proposed work will include, for each of the Operable Units (OUs) on the terrestrial (upland and wetland) portions of Naval Air Station Alameda (NAS Alameda): 1. a habitat map; 2. a preliminary list of Contaminants of Potential Concern (COPCs); 3. a list of potentially complete exposure pathways; 4. a list of potential receptor species; 5. the results of a literature search, field vegetation survey, and trapping surveys to identify mammalian T&E species, especially in the wetlands habitats on NAS Alameda; 6. a preliminary list of assessment and measurement endpoints.

The proposed level of effort of one to two days of field observation at each OU is consistent with the scoping nature of this effort and the extensive data base already accumulated for NAS Alameda by various researchers and observers. However, it should be noted, that the small mammal trapping survey may or may not be sufficient to identify salt marsh harvest mouse (SMHM) use of the site, depending on the details of the trapping proposal (which were not outlined in detail here). Additional input from

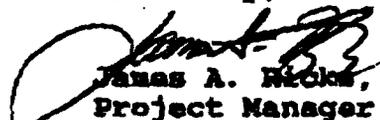
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the State and federal resource trustees may be necessary before the presence of SMHM can be confirmed or denied. Accordingly, EPA strongly recommends that the NAVY consult with the trustees regarding the SMHM.

In terms of the proposed Ecologic Assessment Scoping Report, one salient issue that the NAVY should clearly address concerns the issue of complete exposure pathways and the effects that changes in land use may have on those pathways. At present, the greatest proportion of the more industrial parts of NAS Alameda, where higher concentrations of COPCs may be located, are paved or have buildings that prevent complete exposure pathways to ecologic receptors. Should those areas be demolished and the contaminated soil (and groundwater) be exposed, the formerly incomplete pathways may become completed. There was a reference to "current and historic land use maps" (p. 8), but no reference to future land use decisions nor as whether any have been made. It is EPA's understanding that the interim or short-term reuse plan for NAS Alameda has been made available for public comment. The Agency recommends that the issue of potential implications of environmental conditions on future land use at the facility be examined in the context of the proposed scoping for ecologic assessment. We further urge the NAVY to share these concerns with the reuse authority as final reuse plans are being considered.

Should you have any questions regarding the review comments or require further information, please contact me at (415) 744-2402.

Sincerely,


James A. Nicks, Jr.
Project Manager

cc: T. Lanphar, CAL-EPA (DTSC)
J. Nuarala, CAL-EPA (RWQCB)
G. Kikugawa, EPA-West
LCDR. M. Petouhoff, NAS Alameda