



United States Department of the Interior



FISH & WILDLIFE SERVICE

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Mr. Chris Penny
Project Coordinator
Installation Restoration Section
Environmental Program Branch
Environmental Division
Atlantic Division (LANTDIV), Code 182
Naval Facilities Engineering Command
6206 Hampton Blvd.
Norfolk, VA 23508-1278

Re: Draft Munitions and Explosives of
Concern (MEC) Master Work Plan, Former
Vieques Naval Training Range (VNTR)

Dear Mr. Penny:

The U.S. Fish and Wildlife Service (Service) has reviewed the Draft Munitions and Explosives of Concern (MEC) Master Work Plan, Former Vieques Naval Training Range. The objective of this Work Plan is to provide a description of standard operating procedures for conducting MEC investigations, removal and disposal actions at VNTR. This work plan is to describe the general approach and methods, including the operational and safety procedures to be used by the contractor and its subcontractors to perform MEC response actions at potential MEC sites throughout VNTR. The Master Work Plan is meant to be used as a reference document for standard operating procedures for MEC work. Each section may be used separately as a reference for specific procedures. Specific locations and operating procedures for each site will be provided in separate site specific work plans.

Based on the documentation provided we have the following comments and recommendations:

1) Table 1-1 Potential Applicable or Relevant and Appropriate Requirements (ARARs) To Be Considered: This table does not include the following Federal ARARs; Endangered Species Act, Migratory Bird Treaty Act, National Wildlife Refuge System Improvement Act, Clean Water Act and Magnuson-Stevens Act. While some of these are mentioned in Section 10, they should also be included in Table 1-1. We have noticed that there seems to be some confusion regarding environmental ARARs. We highly recommend a meeting with the concerned Commonwealth and Federal resource agencies, Navy, its consultants, the EPA project manager and EPA ARAR specialists. This would

assure that all ARARs are addressed and that the goals and purpose of the Master Work Plan are met.

2) Section 2 Technical Management Plan: Section 2.3 Project Team. The description of the Project Team Organizational Structure does not mention who or how coordination with the Vieques Island National Wildlife Refuge (VINWR) Refuge Manager will take place.

Section 2.4.2 Archive Search. While an archive records search was conducted in 2002, DOI has previously questioned whether or not the search was as complete as it could be. The Navy should consider a supplemental Archive Search.

Section 2.4.3 does state that DOI personnel on Vieques will be contacted during pre mobilization, however, we would like to see additional details. Close coordination with the Service is essential to assure compliance with ARARs and avoid unnecessary delays.

Section 2.4.12 Operations In Sensitive Areas: In order to aid the Project Manager in identifying sensitive areas, we recommend that an environmental sensitive area map be developed and included in the Master Work Plan, sites specific work plans, and contractor work plans. This map can be a combination of the existing NOAA Sensitivity Index Map and the maps developed for the Integrated Natural Resource Management Plan (INRMP). Production and distribution of such a map to all levels would assist administrative and field personnel in identifying sensitive areas well in advance of field activities.

3) Section 10 Environmental Protection Plan: Table 10-1 Rare and Endangered Terrestrial Plant Species of VNTR: The section includes several species lists, Table 10-1 and Table 10-2. We recommend developing a list for federally listed species and a list for migratory birds known to occur or expected to occur in the area covered by the master plan. The list of federally listed species should include all plant and animal species known from Vieques, and species for which the project area provides suitable habitat. These species include: *Eretmochelys imbricata* (Endangered), *Dermochelys coriacea* (E), *Chelonia mydas* (Threatened), *Caretta caretta* (T), *Trichechus manatus manatus* (E), *Pelecanus occidentalis occidentalis* (E), *Sterna dougalii dougalii* (T), *Epicrates monensis granti* (E), *Stahlia monosperma* (T), *Chamaecrista glandulosa var mirabilis* (E), *Goetzea elegans* (E), and *Calypttranthes thomasiana* (E). Suitable habitat for each of the federally-listed species should be identified by qualified personnel in conjunction with the Service on an aerial photo or a map, and not just in a table format.

Migratory bird habitat should also be identified in coordination with Service personnel and also be depicted on photos or maps.

Protection of Commonwealth listed species should be considered another ARAR and coordinated with the Puerto Rico Department of Natural and Environmental Resources.

4) Section 10.2 Wetlands within the Project Site: We believe that it is erroneous to state that no wetlands are expected to be impacted. Wetlands exist throughout VNTR as mangrove lagoons, salt flats, and streams. Three coastal lagoons, Laguna Anones, Laguna Gato and Laguna Icacos, are all located within the proposed LIA work area. These lagoons are heavily pitted with bomb craters and have exposed MEC. Currently these lagoons are flooded during heavy rain events. Several other herbaceous wetland areas are associated with these lagoons as well.

A map depicting the wetlands within VNTR should be included in this section. This could be included in the proposed sensitive area map, or separately. The FWS National Wetland Inventory or Navy INRMP maps can be used as a basis for this map. This information should be provided to personnel at all levels.

Impacts to wetland during MEC operations should be expected since there are wetlands associated with the LIA, EMA and SIA. Mitigation measures to minimize impacts to wetlands should be discussed in this Master Work Plan. The Service considers the Navy's MEC work in these areas to be a form of partial wetland restoration and recommends that after the MEC removal, reforestation and restoration of hydrology to these wetlands should be considered.

5) Section 10.8 Compliance with ARARS: As stated previously several ARARs are missing, and the contents of Table 10-3 should also be reflected in Table 1-1. To resolve this we recommend a meeting with the resource agencies, Navy and EPA to resolve the ARAR issue.

6) Section 10.9 Detail Procedures and Methods to Protect and/or Mitigate the Resources/Sites Identified: We do not believe that the two measures provided in Section 10.9 satisfy the requirements of the ESA. As we have indicated in previous correspondence and expressed in several meetings with the Navy and its consultants, the Navy needs to develop a Biological Assessment or Biological Evaluation for the cleanup activities. This is particularly needed when a master plan is being developed that will serve as a guide for all future cleanup activities.

The assessment/evaluation should: 1) provide information regarding the species present/possibly present in the Action Area; 2) evaluate potential direct and indirect effects on listed species and their habitats; 3) discuss the conservation measures to be incorporated into the project plans to minimize possible adverse effects, and 4) assist in determining the type of consultation required for the action. For example, the assessment should also include the specific protocols or monitoring plans for searching endangered plants, sea turtle nests, and migratory bird colonies within the Action Area. If possible adverse effects are anticipated, formal consultation should be initiated with the Service.

7) Appendix A Historical Munitions Use at the Former VNTR: In addition to simply listing munitions types, this section should have a photograph or drawing of each munitions item along with a description of its use. This is partly done in Table A-1 in the shaded area "Description of Selected Ordnance Terminology". This terminology should

be applied to all items listed in Table A-1. The same should apply to submunitions. This would help non EOD users of this Master Work Plan including site managers to have a better knowledge of what these items are and the risks involved with each. Also the type of explosive compound or filler of these items should be listed since this may drive future sampling plans. For example, MK-77 is listed as one of the live ordnance used on Vieques. This item is listed in various references as a fire bomb or napalm bomb. Table A-3 shows that about 200 of these items were used in 1975. If in fact this is the item listed in Table A-1, then sampling around the areas where they were used may need to be modified.

As stated in Section 1.5 VNTR was also used by NATO and other allied armies. A listing of all foreign MEC that could possibly be found should also be included in this appendix along with drawings and details of these items as well.

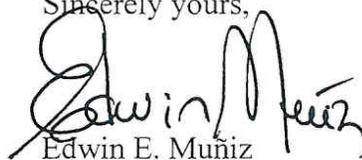
This Appendix should be updated if new items, not already on the list are found.

8) Appendix B Site Safety and Health Plan: Section B.4.3.17, Biological Hazards and Controls needs to include several toxic native plants. These are manchineel, castor bean, *Comocladia* and *Croton*. Manchineel (*Hippomane mancinella*) is an evergreen tree found in coastal forest or thickets and can be more toxic than poison ivy or poison sumac. Its sap produces lesions similar to chemical burns. Castor bean (*Ricinus communis*) also has sap that can cause skin lesions and is found in previously disturbed coastal areas. *Comocladia* is a small shrub found in limestone soils such as the eastern part of the LIA, it has toxic sap and can cause allergic reactions. Another invasive shrub is *Croton discolor*. This small shrub rapidly invades cleared or disturbed areas and can cause respiratory allergies. Photos of these plants and appropriate first aid should be included in this Master Work Plan.

9) Appendix G Section 2.16.2 Fish Sampling: Any fish collected as part of a sampling plan should follow the protocols established in the Illustrated Field Guide for Assessing External and Internal Abnormalities in Fish (USGS/BRD/ITR 2002-0007) and Biomonitoring of Environmental Status and Trends Program: Selected Methods for Monitoring Chemical Contaminants and their Effects in Aquatic Ecosystems (USGS/BRD/ITR 2000-0005). These protocols are designed to determine if impacts to fish are occurring at a physiological level.

As always we appreciate the opportunity to comment on this action, if you have any questions, please contact Felix Lopez of my staff at 787 851-7297 x 226. For questions regarding federally listed species, please contact Ms. Marelisa Rivera at extension 231.

Sincerely yours,



Edwin E. Muñoz
Field Supervisor

fhl

cc:

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