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United States Department of the Interior

FISH AND WILDLIFE SERVICE
Washington, D.C. 20240

ADDRESS ONLY THE DIRECTOR
FISH AND WILDLIFE SERVICE

Mr. Christopher T. Penney
Eastern Vieques Project Coordinator
Naval Facilities Engineering Command
Atlantic Division, Code EV23
6506 Hampton Blvd
Norfolk, VA 23508-1278

Re: Draft Expanded Range Assessment and Phase II Site Inspection Work Plan, Former Vieques Naval Training Range (VNTR) Vieques

Dear Mr. Penney:

We have reviewed the April 2006 draft document entitled Expanded Range Assessment and Phase II Site Investigation Work Plan. The document was reviewed for scientific content, and minor grammatical or typographical errors that do not affect the interpretation have not been noted. Our comments and recommendations follow.

General Comments

There is no discussion regarding the collection of soil samples during Blow-in-Place (BIP) operations. Has it been determined that confirmation sampling is not necessary and that BIP actions do not spread existing or create additional contamination?

The focus of this Work Plan is on surface Munitions and Explosives of Concern (MEC). Has it been determined that sub-surface items do not present a risk in these areas or is the point of this effort simply to collect information to support a Time Critical Removal Action (TCRA) or a non-TCRA? If sub-surface MEC will be a focus of later efforts, it is recommend that a paragraph be added to address that issue, particularly as it relates to the ability of the Navy to identify Munitions Response Sites (MRSs) and Munitions Response Areas (MRAs) where no further action will be proposed.

Phase II greatly expands the scope of current Biological Assessment (BA) for the Live Impact Area (LIA), however, the additional work can be considered an amendment to the existing BA. The Fish and Wildlife Service (FWS) will continue to work closely with the Navy and its contractors regarding the need for any additional surveys and work.

To the extent possible, mechanical clearance of vegetation should not be carried out within 5-meters of any stream bank, stream channel, or inside stream channels. The same holds true for the coastal

lagoons found along the north shore of the Surface Impact Area (SIA) and Eastern Maneuver Area (EMA). A 5-meter buffer should be left between wetland vegetation and the study areas. There are several quebrada conservation zones within the EMA that were designated by the Navy and mechanical vegetation clearance should be avoided in these areas. Again, close coordination with the Navy's qualified biologist as well as FWS Ecological Service and Refuge staff is necessary with regards to vegetation surveys and vegetation clearance within these areas.

The Eastern Conservation Area (ECA) has been added to the existing TCRA as a MRA. It was established in the early 1980's as a conservation zone because of its unique ecology. However, aerial photos show extensive ground scarring and trails along the southern portion (Photos 1 and 2) that should be targeted for investigation. This area is botanically unique and vegetation removal should be minimized. Site selection and Work Plans for this area should be closely coordinated with the FWS. The existing trail system in this area should be included since it will be used by FWS personnel to access the different sites. We would also like to request that Dr. Gary Breckon be allowed to accompany the flora/fauna survey team into the ECA. Dr. Breckon has been contracted by the FWS to update the flora checklist for Vieques and he has already added several new species to the island botanical inventory. Given the uniqueness of this area, we believe that his participation in the survey would be a benefit to both the Navy and the FWS.

The FWS believes that all known sites in the MRA-SIA and the MRA-EMA should be investigated and remediated to a level that would allow FWS personnel to carry out mission related wildlife management activities, reforestation efforts, wildlife surveys, botanical studies, and other Refuge and natural resource conservation tasks. While we recognize that some of these areas will not be open to the general public, the FWS will need access for scientific and general land management purposes.

The Puerto Ferro Peninsula area has several MRSs and possibly some additional areas that warrant investigation. This is also the only area within the open section of Camp Garcia that is closed to the public. With its close proximity to open areas and the location of the historic Berdiales Lighthouse, opening this peninsula to public use is a priority for the FWS and the Municipality of Vieques. This area is currently composed of PI (Photo Identified area)-9 (MRS 12), PI-13 (MRS 14 or 46; in Table 3-1 it is cited as MRS 14, but in Figure 3-1 it is shown as MRS 46), the near shore munitions reef, several small trash piles containing shell casings, a small arms dump site and two large pits along a trail (Photos 3 through 8 and Figure 1). Photo Identified area 9 was clearly visible in historic aerial photos of the area (Photos 3 through 5) and is identified as a munitions or explosive storage area. At that time, a dirt road ran south along the west side of the peninsula, and two pits about 6-feet across and 3-feet deep are found on either side of this road, near a small inland lagoon (Figure 1). The origin of these pits is unknown, but there are sizable trees growing near them indicating that the area has not been disturbed in recent years. Another site associated with PI-9 is a fill area first identified in 1959 at the edge of Puerto Ferro and likely associated with an explosive storage area to the west. The deposit of shell casings associated with this site (Photos 6 and 7) are noted as increasing in size in 1962. In the 1970 aerial photos, the current access road to the lighthouse appears along with a large degree of ground disturbance. This is when PI-13 first appears along with the areas that now contain several trash piles (Photo 8). The FWS requests that during the Phase II Site Investigation (SI), all of the sites in the Puerto Ferro Peninsula be investigated.

Specific Comments

Page V, Lines 6, 9, 15, 17, and 21 These sections indicate that surface MEC evaluations of approximately 10 percent of the indicated MRSs will be performed. In later sections, the text does not provide a rational for this selection, nor does it discuss how the 10 percent sample area will be selected.

Page 2-1, Paragraph 2.2, Line 36 The terms 60-millimeter (mm) to 175-mm are not consistent with the terms used in Appendix C of the Phase I SI Report. It is recommend the MEC terms be standardized.

Pages 2-1 through 2-5, Paragraph 2.2 It is not clear how the investigations referred to in this Section were conducted (i.e., visual reconnaissance). Standard practice is to conduct surface clearance at a regular interval around targets and during annual range maintenance, and sub-surface clearance is not normally part of this action. It is not clear if the investigations and the data support eliminating the indicated MRSs from further investigation.

Page 3.2, Paragraph 3.2.1, Line 29 and 30 and Page 3.6, Paragraph 3.2.2, Lines 21 and 22 The results of the Geophysical Prove-Out (GPO) Report and Digital Geophysical Mapping (DGM) system should be provided for review prior to start of the field effort.

Page 3-7, Paragraph 3.2.4, Line 32 and Page 3.8, Paragraph 3.2.5, Lines 30 through 32 and 36 It is unclear how the 10 percent sampling area will be selected for evaluation.

Page 3-10, Paragraph 3.4, Lines 10 through 39 The conversion of site identifiers such as PIs and potential areas of concern to MRSs is causing confusion among reviewers attempting to following particular sites across documents. It is assumed that the Munitions Response Program (MRP) Enterprise data management system will be used to standardize the name and identification of these sites and allow reviews to cross reference the results in a standardized manner.

The discussion indicates that the MRP Enterprise data management system will be used cradle-to-grave to capture field data and processing notes. Based on the Phase I SI review, there is little evidence that MEC data standards have been employed, coordinated, or standardized among potential users and multiple contractors including the Defense Installation Spatial Data Infrastructure (DISDI) activities, the FWS, and the Comonwealth of Puerto Rico. As the Comonwealth of Puerto Rico Land Management System is considered to be the "grave," this is an important aspect of the overall Vieques Project. Accordingly, evidence of data standardization and coordination is requested.

Figure 5-1 Figure 5-1 shows inhalation, direct contact, and ingestion as potential routes of exposure for MEC, but none of the data to be collected per this Work Plan or presented in the Phase I SI Report attempt to evaluate the risk. The figure meshes risks and safety issues associated with MEC with chemical issues associated with components of the MEC items. It is suggested that an explanation be added to this section to discuss that evaluation.

Page 3-11, Paragraph 3.5, Lines 2 through 21 and Figures 3-3, 3-4, and 3-5 Are there any plans to communicate with the island residents and/or the Commonwealth of Puerto Rico regarding BIP actions and/or decisions? The control of public access is inlcuded in a block of Figure 3-4, however there is no inference to any communication with the Environmental Protection Agency (EPA), the FWS, or Commonwealth of Puerto Rico regarding their involvement in the decision making process.

Page 5-1, Paragraph 5.1, Lines 6 through 9 and Figure 5-1 The Conceptual Site Model (CSM) is key to understanding risk and does a good job of identifying the most probable origin of MEC contamination at the site as a whole, but there is no discussion of data gaps and it fails to indicate how exposure will occur and what the most probable pathways are.

Page C-4, Paragraph B.17 The final site-specific GPO Report and the Finalized Data Quality Objectives (DQO) for the Geophysical Investigation should be provided for review.

Page C-8, Paragraph B.20.7 It is stated in this Section that "If a suitable point is not available, a Puerto Rico-certified PLS will establish a minimum of two new monuments or survey markers with a minimum of third-order accuracy." This seems to indicate there are no control points in the Eastern end of the island. Is this true?

Thank you for the opportunity to comment on this document, if you have any questions please contact Richard Henry at 732-906-6987.

Sincerely,

Richard Henry
Project Manager

cc: John Tomik, CH2MHILL, Virginia Beach, VA
Stacin Martin/CH2M HILL, Virginia Beach, VA

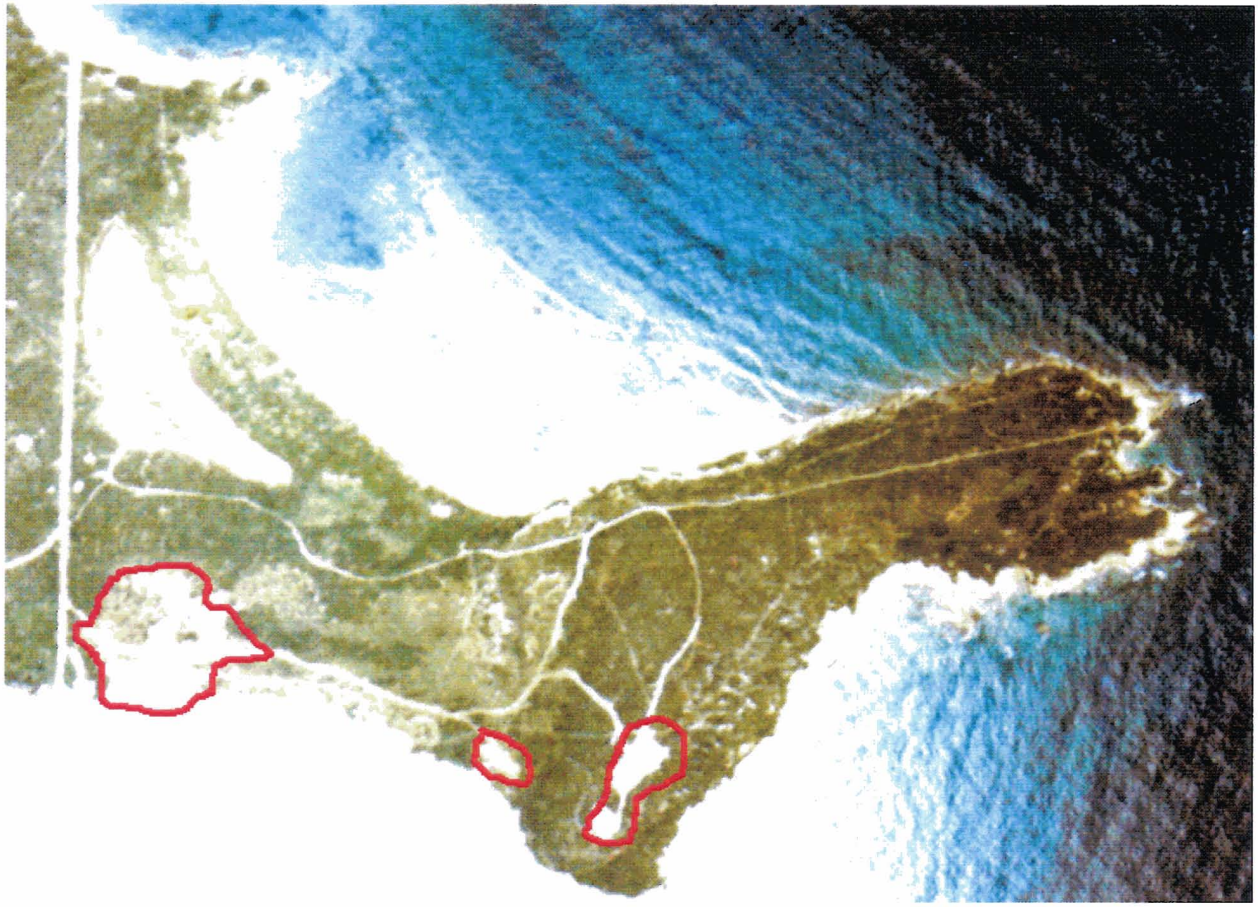

Photo 1. Eastern Conservation Area circa 1970. Note ground scarring and road cuts throughout the area.

Photo 2. Eastern Conservation Area circa 2000. Note there are still some ground scars, but the majority of the area has some vegetative cover.

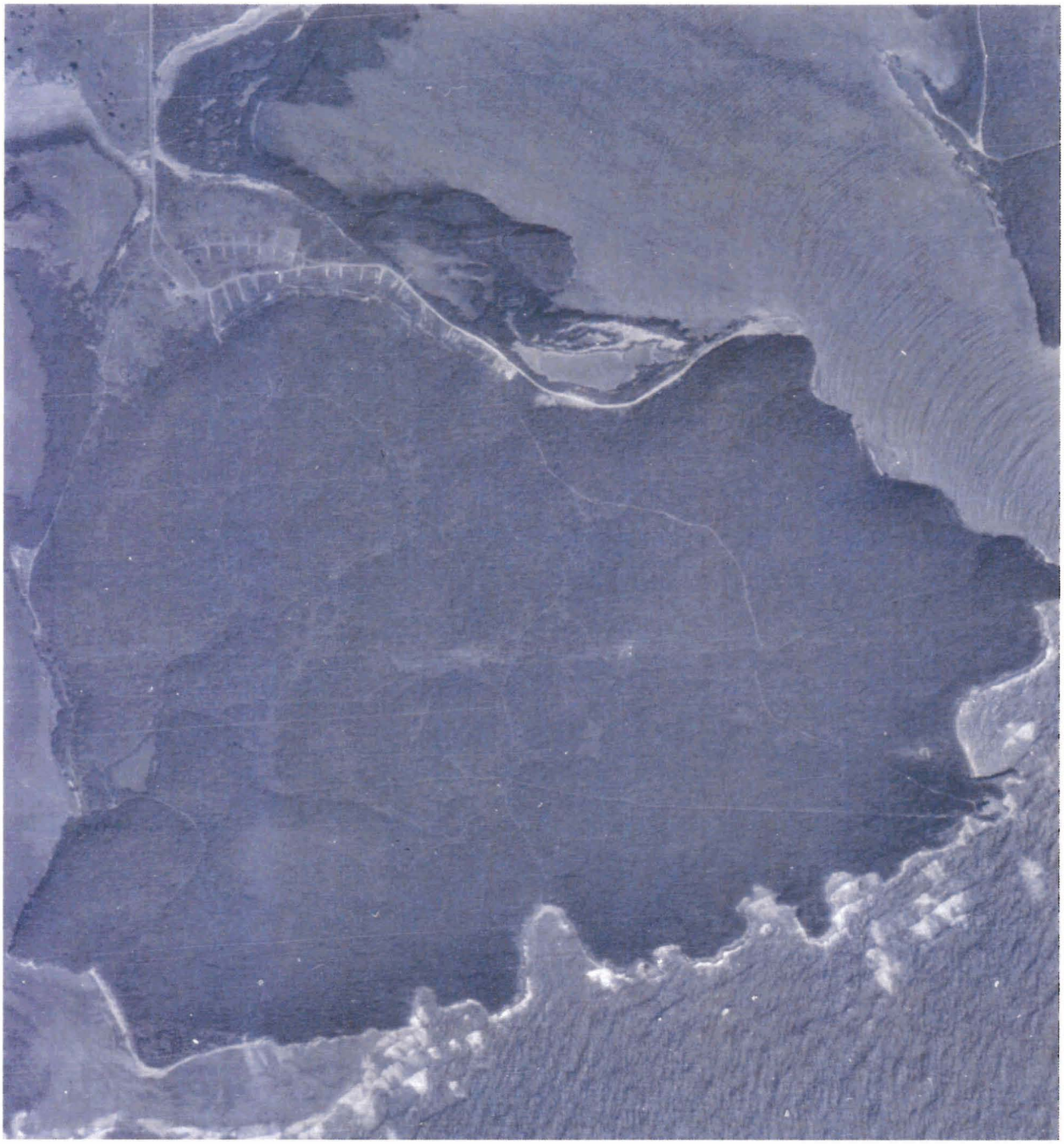

Photo 3. Puerto Ferro circa 1959. Note the location and extent of PI-9 (MRS 12). The fill area east of PI-9 in the bay was first noted at this time. Also note road heading southwest from this site.

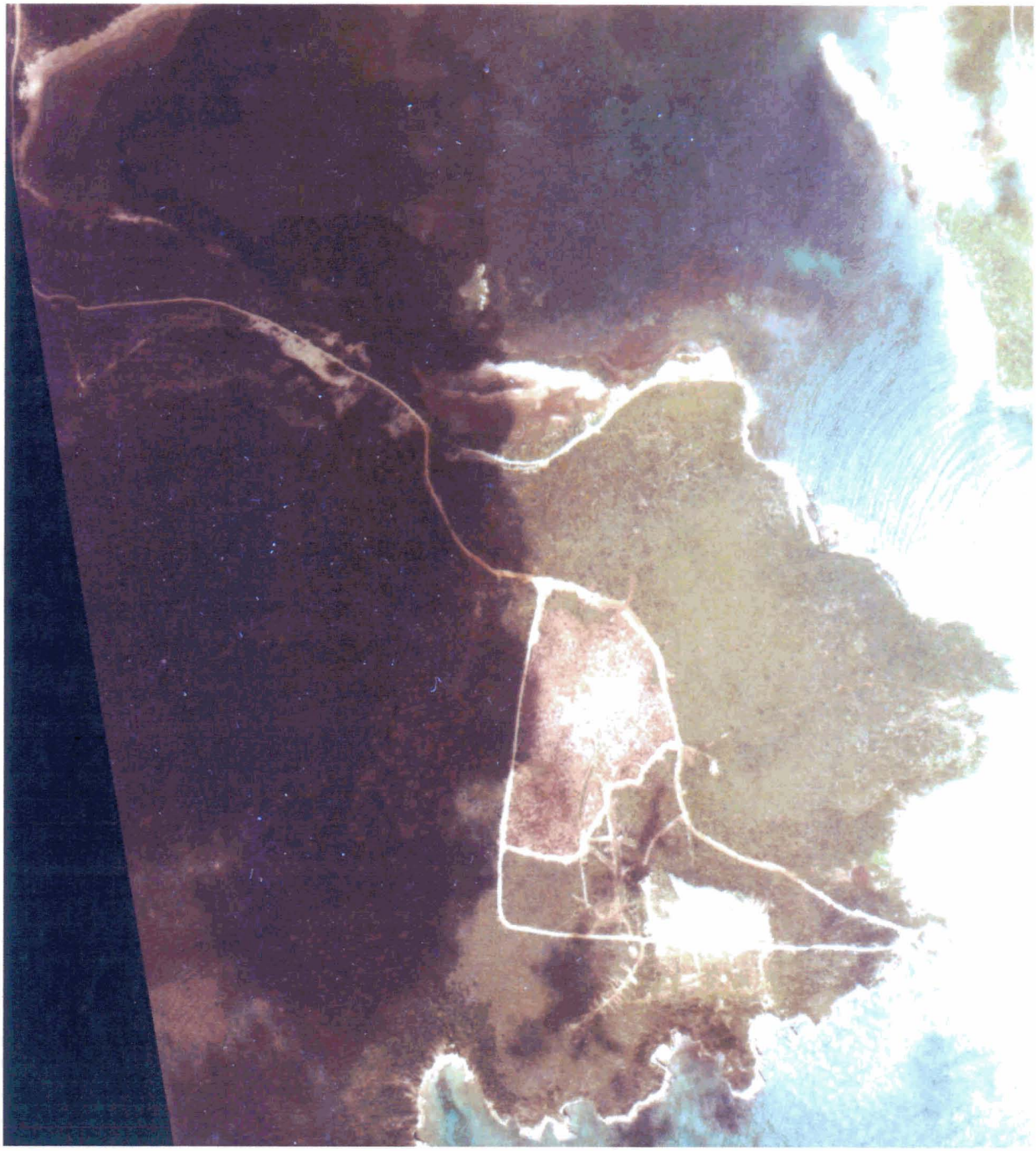

Photo 4. Puerto Ferro circa 1970. Note the decrease in size of PI-9, however this photo marks the appearance of PI-13 (MRS14 or 46), scarred areas near the lighthouse, the creation of the existing lighthouse road, the burn area in the central portion of the photo, and additional roads. With the exception of the lighthouse road, many of these sites are now covered with sparse vegetation.

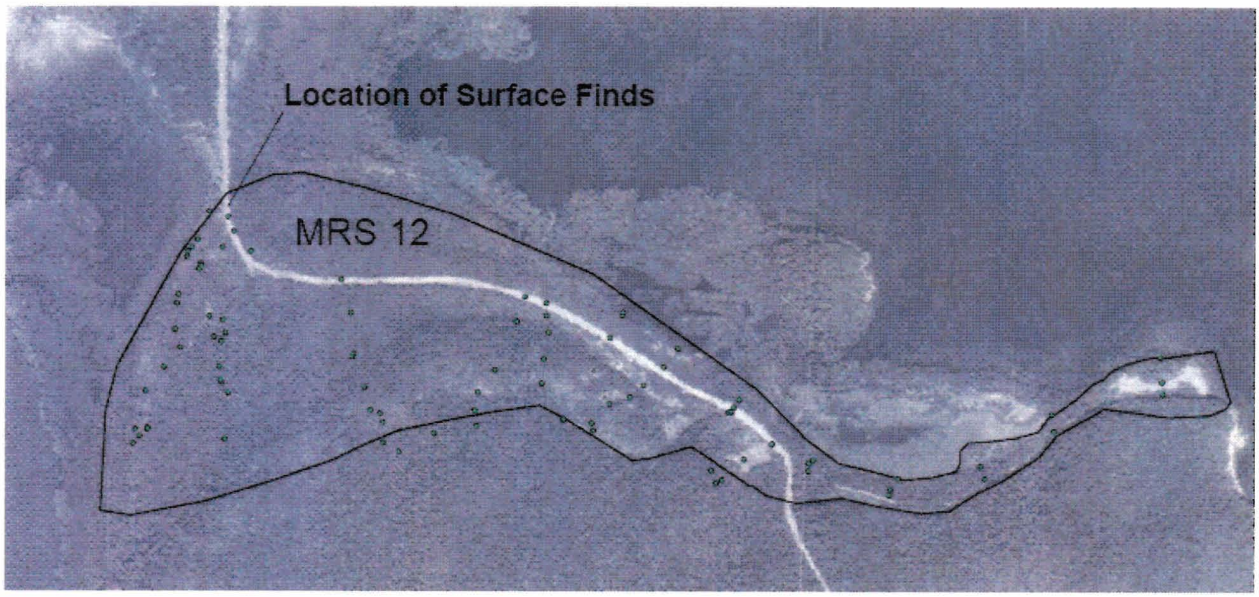

Photo 5. Expanded Range Assessment Site Investigation Phase I subsurface anomalies. Note that many of the hits were in the location of the old ammunition or explosive storage areas. Two expended 155 mm and 120 mm projectiles were found near the access road where several buildings once stood. While no anomalies were found north of the road, aerial photos indicate that structures were present north of the road where it curves to the east.

Photo 6. Shell casings found in very shallow water several yards from the current shoreline of the fill area along the eastern shore of PI-9. The fill area may have extended beyond this point and the fill may have eroded and exposed the casings. This particular area is usually shown to demonstrate "contamination" that has been caused by historic Department of Defense activity at Vieques.

Photo 7. Deposit of small arms ammunition in salt flat north of PI-9. The extent of this dump is not known.

Photo 8. One of several trash dumps located along the old lighthouse road in Puerto Ferro containing munitions debris. The extent of these dumps is not known.

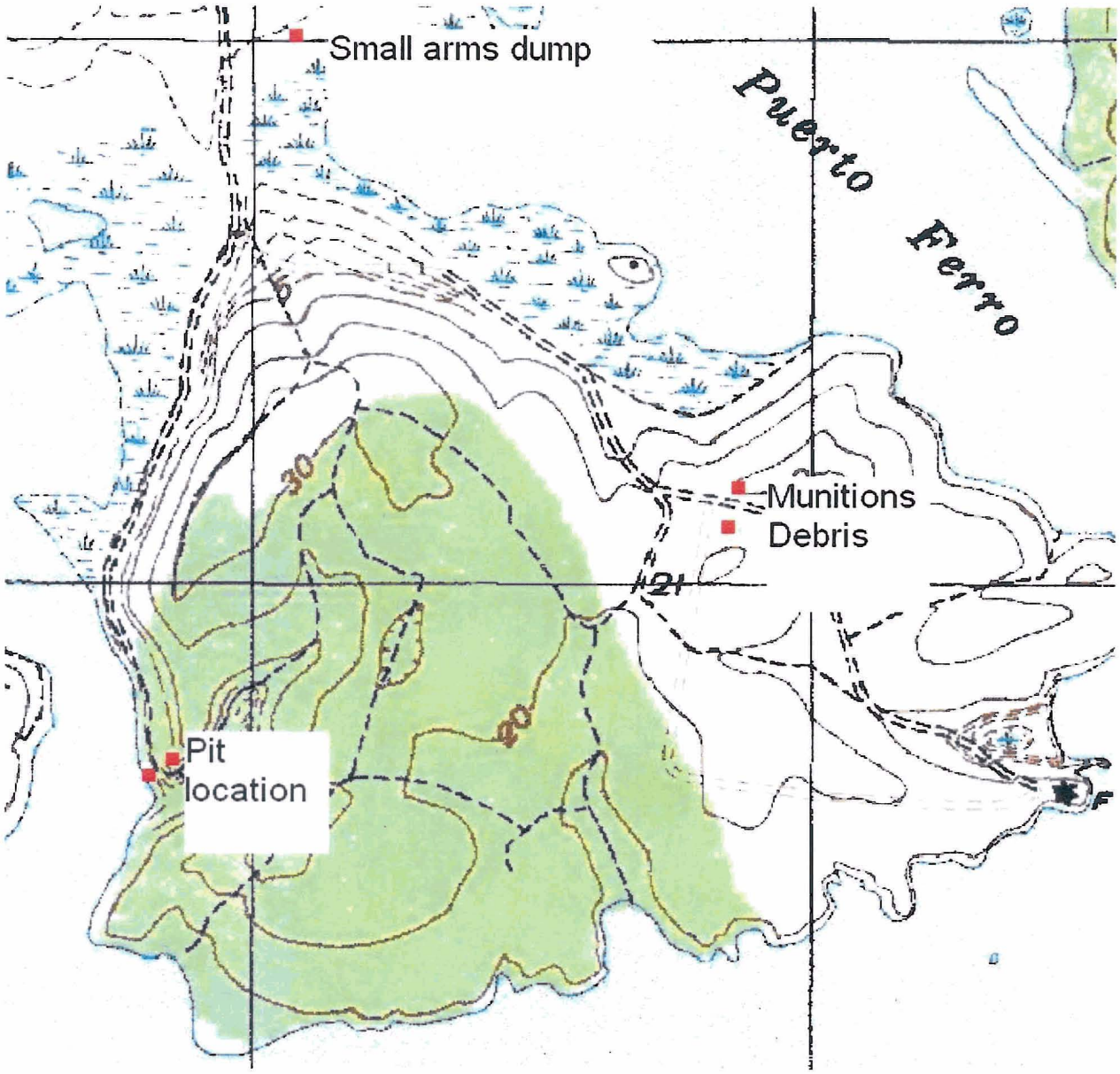

Figure 1. Location of additional sites on the Puerto Ferro Peninsula that should be included in the current round of investigations.