

11/1/04 - 02822



# United States Department of the Interior



**FISH & WILDLIFE SERVICE**  
**Boqueron Field Office**  
Carr. 301, KM 5.1, Bo. Corozo  
P.O. Box 491  
Boqueron, PR 00622

Mr. Christopher Penny  
Naval Facilities Engineering Command, Atlantic  
6506 Hampton Blvd.  
Norfolk, VA 23508-1278

Re: Final Expanded Range  
Assessment/Phase I Site Inspection  
Work Plan, Former Vieques Naval  
Training Range, EPA ID #  
PRD980536221

Dear Mr. Penny:

We have received copy of the November 2004 Final Expanded Range Assessment for the former Vieques Naval Training Range (VNTR). In future correspondence please refer to FWS Tracking # 147-105-05-287. The Service had previously commented on the draft version of this document, while most of the Service's concerns have been incorporated into this final version, we have the following comments and recommendations:

- 1) Figure 2.2. The legend stating "sea turtle nesting areas" should be listed as "Known Sea Turtle Nesting Areas". While Section 2.5 mentions that Figure 2-2 shows known locations of sea turtle nesting, the legend on the Figure does not specify that. We will continue to coordinate with the Navy in the development of appropriate protocols to avoid impacts to nesting sea turtles during these and future actions.
- 2) Section 2.3.4. Eastern Conservation Area (MRA-ECA). The Conservation Zones on Vieques were established in 1983. However, prior to that date these areas were simply part of the overall VNTR area. The use of these lands for military activity prior to the establishment of the Conservation Zones is what concerns the Service. For example, the Eastern Conservation Zone was previously associated with the Live Impact Area. Photographic analysis shows significant ground scarring in the 1970 aerial photographs, within this area which was later designated as the Eastern Conservation Zone. The source of those ground scars and what went on in that area has not been determined.
- 3) Section 3.1.1. There are several beaches that are within the areas open to the public that were never surveyed by the Navy, these are small pocket beaches are popular

with the local residents and tourists. The beaches known as Playa Escondida, No Name, Orchid, and Playa La Plata should be a priority for inspection and removal of munitions related items. This concern has been mentioned in writing and in several meetings, maps showing these beaches have been provided to the navy in past comments. Figure 3.1 is missing one of the beaches. It is the area known as Hidden Beach which is located immediately west of SWMU 2. With the closure of Blue Beach due to road damage from this year's hurricane season this beach has received increased use. The Service continues to recommend that these small pocket beaches be surveyed first during the MRA inspection.

4) Section 3.1.4.4, EMA MRS 12, This section is specific to the current Photo Identified Site 9. In the course of field investigations and habitat monitoring, Service biologists have found two additional sites which may be associated with this site. One is located in the saltflat area north of Puerto Ferro where small arms munitions were apparently disposed of. Also two circular pits or craters were found near the small beach on the western shore of Puerto Ferro. This information was provided to EPA and the Navy in the Service's comments regarding the June 2004 Draft Phase 1 RCRA Facility Investigation Report, Former Atlantic Fleet Weapons Training Facility. The possibility of including these two sites as part of this MRS inspection should be considered.

5) Section 3.3.2 Vegetation Removal, We had previously requested that our personnel be present during vegetation clearing operations. However, given the current staffing levels and workloads of the Vieques National Wildlife Refuge staff, it may not be possible to have a FWS biologist readily available to work with the Navy. Our concern with vegetation removal is the possibility of impacting an endangered species or finding a species not yet reported for Vieques. Since many of the areas designated for transects have never been surveyed for fauna and flora, the creation of these transects and ephemeral data that can be collected during transect cutting will could expand the known list of fauna and flora for the islands. While we will attempt to collaborate with the Navy and its contractors as much as possible, we recommend that the Navy also have a biologist on staff in Vieques to coordinate efforts with the Service.

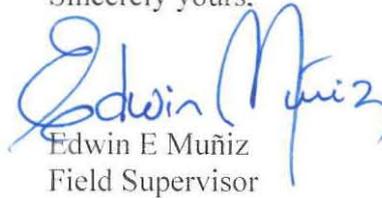
6) Section 5.1 Conceptual site model, the model has a low potential for exposure in sediment for wildlife, while this may hold true for most birds, some species actually probe the sediment to feed and the model does not take into account burrowing macro invertebrates such as crabs. Also at risk to exposure in sediment is the research scientist, wildlife management worker, recreational user, park ranger and trespassers. The main sources of sediment that the service is concerned with are those associated with the wetlands and mangrove lagoons found in the VNTR. Also primary releases in sediment should also include burial, mishandling or loss, and duds.

7) Appendix A.9 Spill Prevention. The opening paragraph states that spill should be reported to the supervisor, site manager and PM. However it does not state that spills will be then reported to the National Response Center (1 800 424 8802), which is the sole federal point of contact for reporting oil and chemical spills as mandated by federal regulations.

8) Section A.11.8. While this section will be completed during project start up, we recommend that EQB (Environmental Emergencies) and the Vieques National Wildlife Refuge manager be added to the notification list.

We appreciate the opportunity to comment on this document, if you have any questions please contact Felix Lopez of my staff at 787 851-7297 x 226.

Sincerely yours,



Edwin E Muñiz  
Field Supervisor

fhl  
cc:  
EPA, Vieques  
EQB, San Juan  
Vieques NWR, Vieques  
Tim Gordon, USEPA, RCRA, New York