



United States Department of the Interior



FISH & WILDLIFE SERVICE

Boqueron Field Office

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FEB 27 2008

Mr. Daniel Hood
Remedial Project Manager for Vieques
Naval Facilities Engineering Command, Atlantic
6506 Hampton Blvd
Norfolk VA 23508-1278

Re: Vegetation Removal Beaches in the Former
Live Impact Area (LIA) within the Former Vieques
Naval Training Range, Vieques, Puerto Rico

Dear Mr. Hood:

We are writing to you to express our concern over the current removal of woody beach vegetation conducted during clean up activities at the former Live Impact Areas in Vieques.

On February 8, 2008, during a routine visit to the former LIA, Service biologist Felix López observed removal of native coastal vegetation on two beaches; Playa Brava and Playa Blanca (see enclosed photos). Both of these coastal areas support nesting habitat for threatened and endangered sea turtles (*Dermochelys coriacea*, *Eretmochelys imbricata* and *Chelonia mydas*). The vegetation clearing activities may have resulted in the removal of nesting habitat, in particular habitat for the hawksbill sea turtle, which depends on coastal vegetation for nesting.

In 2006, the Navy designated both beaches as Zone 3 beaches, beaches with major restrictions, because the significant number of nesting activities reported. In Playa Brava, the DNER (from 1990-1999) reported 36 leatherback sea turtle nesting activities, 16 nesting activities of hawksbill sea turtles, and 105 nesting activities of the green sea turtle. Playa Blanca, located in the former Eastern Conservation Zone, supported three nesting activities of hawksbill sea turtle and 23 of green sea turtle. Chapter 7 of the Navy's final Biological Assessment (BA) submitted on June 28, 2006, included numerous conservation measures to minimize and mitigate possible adverse effects on sea turtles during cleanup activities. The 2006 final BA discussed in detail the frequency of monitoring, established set backs before vegetation removal, and mitigation measures during vegetation removal and ordinance detonation (pages 7-1 to 7-3). Table 3-2 specified the set back from the edge of the woody vegetation for each beach. Playa Brava Beach was designated a Zone 3 beach (Section b-15 to B-18) has a set back of 10 meters from the crest (top) of the dune inland. The reason for this set back was previous reports of hawksbill sea turtle nests on the dune. Playa Blanca is also a designated Zone 3 beach, and the Amendment 1 to the BA submitted in December, 2007 specified a set back of 5 meters from the crest of the dune inland.

On July 21, 2006, the Service agreed with the Navy that the implementation of the measures

outlined in the Final BA were appropriate to minimize possible adverse effects to federally-listed species and concluded consultation informally. On December 17, 2007 we concurred with the determination of zones and proposed set backs for beaches in the former Eastern Conservation Area.

Based on our observations during the site visit in February, 2008, the established set backs may not have been implemented by the Navy during vegetation removal activities. We are also not aware if any of the additional conservation measures included in Chapter 7 of the BA were implemented such as the use of vehicles on the beach, etc. Since we concluded consultation, we have not received any reports on the sea turtle surveys that have been conducted in the area or the implementation of the conservation measures.

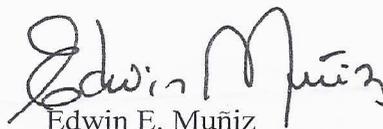
We recommend that the Navy address this issue, determine appropriate measures to ensure that all the conservation measures agreed upon by the Navy and the Service are fully implemented. This will preclude what we observed in February from happening again in the future and, most importantly, will minimize impacts to the species. We also recommend initiating the restoration of affected habitat.

Failure to implement the conservation measures during vegetation removal and clean up actions, would be in violation of the ARAR's outlined in the various workplans, and may result in the "incidental take" of nests present in the area. Adverse effects to individuals or nests may trigger re-initiation of ARAR consultation.

These comments are provided under the Endangered Species Act (87 Stat. 884, as amended; 16 United States Code 1531 et seq.).

If you have any questions, please call Marelisa Rivera at 787-851-7297 extension 231.

Sincerely yours,



Edwin E. Muñiz
Field Supervisor
Caribbean Field Supervisor

mtr/fhl

cc:

NWR, Vieques

NWR, Caribbean Islands

EPA, Vieques

Richard Henry, USFWS, New Jersey

Kevin Cloe, NAVFAC

Lic. Josefina González, EQB

Johnny Noles, NAVFAC



Playa Brava in the LIA looking west, the grids behind the beach are surfaced cleared. This is a Zone 3 beach with a vegetation clearance buffer of 10 meters beyond dune crest. The current vegetation removal places the dunes at risk from erosion during a storm event. Vegetation was cut but not uprooted. Note piles of vegetation towards the end of the beach.



Playa Blanca looking east in the ECA, this beach was classified as Zone 3 with a vegetation buffer of 5 meters beyond the dune crest. Note vegetation piles near the beach. This was pointed out to Navy personnel on scene and we were told they will pull back the brush away from the near shore. Also note hillside clearance towards the top of the photo, this may cause sedimentation and erosion in the area.



Playa Blanca looking west from ECA access road. Brush piles to be removed from the beach as soon as possible.