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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

JAN 31 2006

Jeffrey C. Harlow
Western Vieques Remedial Project Manager
Naval Facilities Engineering Command Atlantic
Environmental Division
6506 Hampton Blvd
Norfolk, VA 23508-1278

Re: Draft Engineering Evaluation/Cost
Analysis for MEC Removal, Solid Waste
Management Site Unit 4, Former Naval
Ammunition Support Detachment, Vieques,
Puerto Rico

Dear Mr. Harlow:

This is to comment on the December 2005, draft Engineering Evaluation/Cost Analysis (EECA) for Munitions of Explosive Concern (MEC) Removal for Solid Waste Management Unit 4 (SWMU 4). This action is intended to remove the potential hazards associated with MEC at the site and remove MEC and MEC-related material.

SWMU 4 is a former open burn /open detonation (OB/OD) area that was used for the destruction of munitions, fuels and propellants dating back to the 1940's, but most heavily used from 1969 to 1979. The area was also used for the treatment of unexploded munitions from targets on East Vieques. Based on the results of previous investigations it is estimated that from 2,400 to 3,200 munitions items remain in SWMU 4. A security fence was erected to encompass the entire possible extent of MEC release; about 400 acres are enclosed in that fence. A total of 16 OB/OD pits have been identified. Approximately 87 acres have been surveyed and it is now evident that the area impacted by historical MEC disposal practices extends well beyond the previously existing investigation area because of debris that was expelled from the actual pits during burns and detonations.

The proposed alternative requires location and removal of MEC to specific depths based on proposed land use. All superficial MEC will be removed throughout the entire site. Along all roadways, planned trails and site fences the MEC will be removed to a depth of 2 feet. A 50 foot buffer on either side of these locations will be cleared to the same depth. Along the sandy beach areas, from the waterline to the vegetation line, all MEC will be located and removed to a depth of 4 feet.

Prior to clearance of MEC the areas will be cleared of vegetation following established protocols to minimize impacts to the surrounding landscape. Since the entire site will not

be completely cleared of munitions to similar depths, land use and institutional controls will have to be established to restrict future site development and access.

Based on the information provided and the history of this site, we have the following comments and recommendations:

1) The Service does not agree with the selected alternative since it does not follow the established guidance regarding depths of clearance. Although we agree with a 2 foot clearance depth along all roadways, planned trails, and site fences and the accompanying buffers and the 4 foot buffer along the sandy beach areas, from the waterline to the vegetation line, we believe that there is sufficient site specific data and proposed land use data to require as a remedial action objective a minimum 1 foot clearance depth for the rest of the site instead of the proposed clearance of superficial MEC. The 1 foot clearance is the minimum depth for limited public access areas such as wildlife refuges recommended by the DOD Explosive Safety Board (DOD Ammunition Explosives and Safety Standards, 2004). This clearance would allow access to the area by Service personnel, researchers, and the occasional hiker.

2) The EECA does not address the presence of several large subsurface anomalies found on the site. These anomalies are not associated with the known OB/OD pits and should be investigated as part of this non time critical removal action (see Figure 1). The Service has recommended that these anomalies be investigated and the response has been that it would be done at some future time. We believe that this would be an excellent time to do this.

3) A map needs to be included showing exactly what grids of the Area Geophysical Survey will be cleared and to what depth. This will help in evaluating removal in the area of known MEC items.

4) The proposed alternative includes maintaining the existing chain linked fence, something that the Service envisioned as an interim measure, not a permanent solution. The EECA states that long term operation and maintenance will be required to maintain the remaining fences and other Institutional Controls, but does not mention who will do that work. The Service may not have the funds to maintain miles of fencing at the level required by the EECA.

5) The proposed alternative includes the clearance of a large area of wetlands (Figure 2) associated with Kiani and Boca Quebrada lagoons. Mechanical vegetation clearance in these areas is not recommended since restoration would be difficult. Unexploded ordinance avoidance and clearance of vegetation should be done by hand only or not at all.

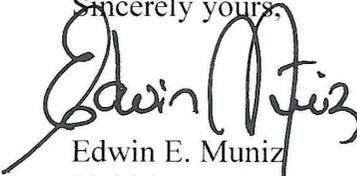
6) In order to assure compliance with Applicable or Relevant and Appropriate Requirements (ARARs), clearance of the beach areas needs to be closely coordinated with our Endangered Species and Refuge staffs to assure that possible impacts to nesting

sea turtles is avoided. A sea turtle protocol should either be incorporated as an appendix to this EECA or must be part of any Work Plan.

7) Many of the areas to be investigated and cleared were previously cleared of vegetation in past investigations. Most of the area is now dominated with rapid growing invasive plants. The Service has repeatedly stated in meetings and conference calls that it was the Service's intention to reforest areas cleared for removal of MEC with native vegetation. In fact, habitat restoration is part of the Service's mission and the restoration of the native subtropical forest has been already identified as an important goal in the on-going Comprehensive Conservation Plan for Vieques National Wildlife Refuge. We recommend that once cleared of MEC, these areas be replanted as soon as possible with appropriate native vegetation to avoid the re-introduction of invasive species.

While the EECA is a broad explanation of what will be done at SWMU 4, we are concerned that the guidance, as presented in this document will make future changes to Work Plans more difficult. This is why we believe that the above recommendations should be incorporated into the EECA document.

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

Sincerely yours,

Edwin E. Muniz
Field Supervisor

Enclosures

fhl

cc:

USFWS, Vieques

EPA, Vieques

NMFS, Lajas

Yarissa Martinez, EQB, San Juan

DNER, Robert Matos, San Juan

Brett Doer, CH2MHILL, Virginia Beach



Figure 1. Pink areas show large buried anomalies many of which are not associated with OB/OD pits (odd shaped black numbered polygons). The investigation of these anomalies has been requested several times in the past.

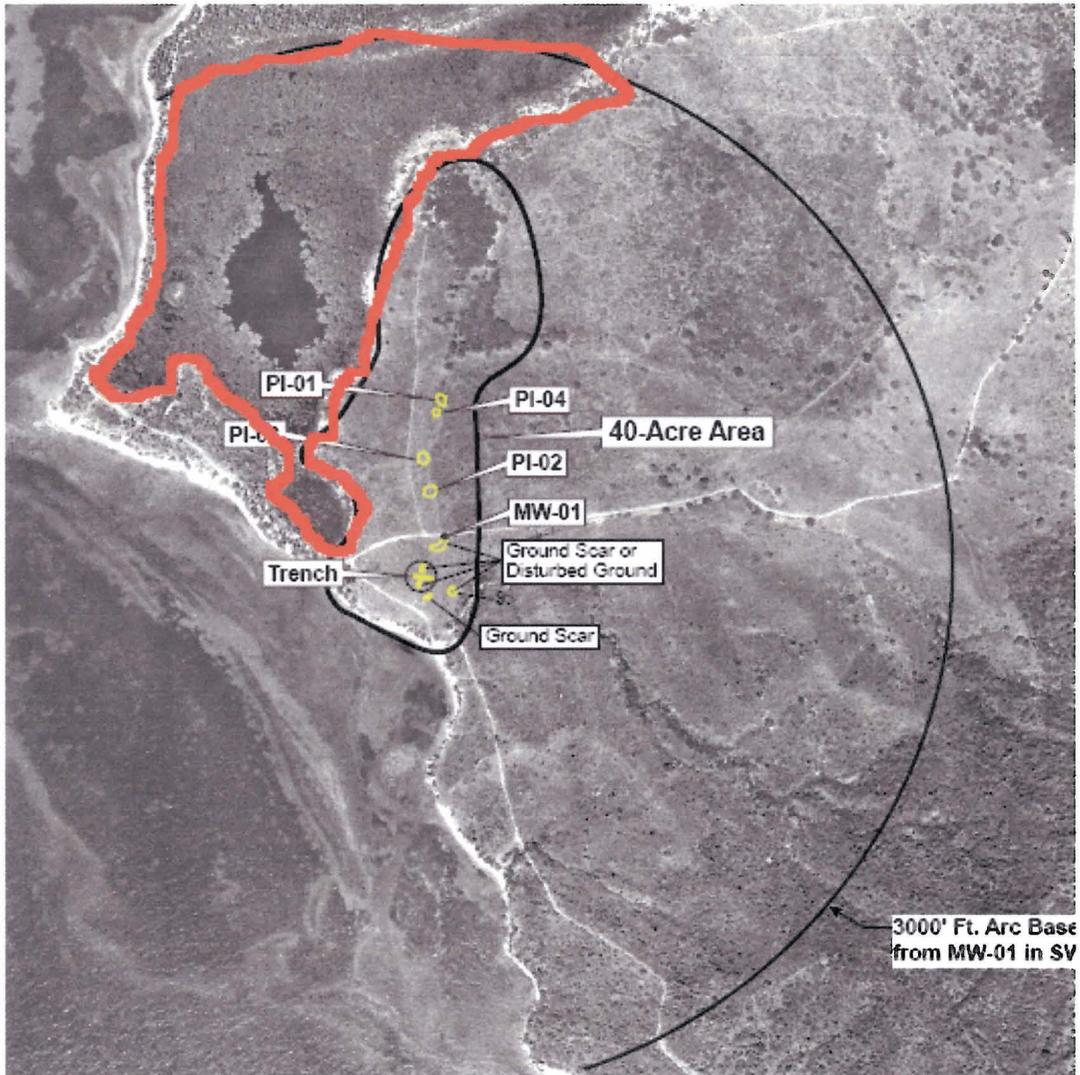


Figure 2. Wetland areas associated with SWMU 4 are outlined in red. A three strand barbed wire fence was placed through most of this area. Clearing and placement of fence in this area was all done by hand to avoid unnecessary impacts to the wetlands. MEC work in this area should be limited to use of hand held equipment with no mechanical vegetation clearance.