



United States Department of the Interior

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ALAMEDA POINT
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FISH AND WILDLIFE SERVICE
Ecological Services
Sacramento Field Office
3310 El Camino Avenue, Suite 130
Sacramento, California 95821-6340

IN REPLY REFER TO:

FWS/EC-97-034

January 23, 1997

Ms. Teresa Bernhard
Remedial Project Manager
Engineering Field Activity, West
Naval Facilities Engineering Command
900 Commodore Drive
San Bruno, California 94066-5006

Subject: Naval Air Station Alameda Draft BRAC Cleanup Plan, Revision 2

Dear Ms. Bernhard:

Thank you for providing the U.S. Fish and Wildlife Service (Service) the opportunity to comment on the subject document. In general, the document was concise and well-organized; however, it was in obvious need of updating to ensure that the status of actions indicated as being scheduled for fall of 1996 or earlier reflects the most recent information. The following specific comments apply:

Page ES-1, Executive Summary, even-numbered pages of text were missing; however, Table ES-1 was complete.

Table 3-1, Projected Use of Naval Air Station (NAS) Alameda, needs to be updated to reflect current status of Findings of Suitability to Lease. It is also recommended that this table, or a separate table, include the status of other reuse actions, such as the Federal transfers to the U.S. Coast Guard and the Service. The addition of text addressing the status of those reuse actions would also be helpful.

Page 5-29, West Beach Landfill, has a typographical error regarding the completion date for the remedial investigation report. Presumably the date is intended to be January 1998 vice 1988.

Page 5-47, Oakland Inner Harbor, should be identified as site number 20 vice 17 in the section "Status and Key Issues."

Page 5-58, PCB Regulation, seems inconsistent regarding the disposal requirements of the Toxic Substances Control Act. Clarification or rewording is recommended.

Page 5-64, Natural Resource Trustees, is somewhat misleading regarding the trustee status of the Service and the Bureau of Land Management, both agencies of the Department of the Interior. Under the Comprehensive Environmental Response, Compensation, and Liability Act, the Secretary of the Interior is the designated trustee. The Department of the Interior agencies act on the Secretary's behalf in issues related to resources for which they have statutory responsibility. In the case of the Service, those resources include endangered species, migratory birds, anadromous fish, some marine mammals, and the land and resources of the national wildlife refuges. The subsequent discussion of applicable natural resource laws should also include the Marine Mammal Protection Act of 1972 and the National Wildlife Refuge System Administration Act. The latter act, which broadly prohibits take of natural resources on refuge lands, will be applicable once the National Wildlife Refuge is established.

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Page 5-67, Fisheries, does not discuss the species or life histories of fish found in the wetlands. Identification of those species will be important in the ecological risk assessment to evaluate the effects of contaminants in the food web on both aquatic and terrestrial ecological receptors.

The Service appreciates the level of effort that has gone into the cleanup of NAS Alameda, and looks forward to continued participation in the cleanup process. If you have any questions regarding this correspondence, please contact Mr. Jim Haas of my staff at (916) 979-2110.

Sincerely,



Wayne S. White
Field Supervisor

cc: Chip Demarest, DOI OEPC, San Francisco, CA
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