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FISH AND WILDLIFE SERVICE  
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IN REPLY REFER TO:  
EC 00-

August 7, 2000

Mr. William Kaktis  
Department of the Navy  
Engineering Field Activity, West  
Naval Facilities Engineering Command  
900 Commodore Drive  
San Bruno, California 94066-5006

Subject: Comments on Draft Unexploded Ordnance Work Plan for Operable Units (OUs) 3 and 4 at Alameda Point, Alameda, California

Dear Mr. Kaktis:

Thank you for providing us with the opportunity to review the subject document. We are generally supportive of the work outlined in the work plan. Specific comments are as follows:

Page WP-8, Section 3.2.1. This section states that feral rabbits are the dominant animal species at Site IR-1. The word "feral" is traditionally used to describe domesticated animals that have reverted to the wild. In the case of rabbits, that would imply that the species on site is the European rabbit (*Oryctolagus cuniculus*). However, it is likely that this section is actually referring to the black-tailed jack rabbit (*Lepus californicus*), since Section 3.3 later discusses the presence of black-tailed jackrabbits at the site. Use of the formal species name following the first use of a species' common name helps avoid confusion.

Page WP-9, Section 3.3. The text is unclear regarding the locations of the Caspian tern (*Sterna caspia*) breeding colony, which is located in the Site IR-2 wetland, and the endangered California least tern (*Sterna antillarum browni*) breeding colony, which is located on the tarmac east of the Site IR-2 wetland. In addition, this section, which addresses ecological concerns, should state that the project will be timed to avoid interference with spring breeding and rearing at the tern colonies. If you believe the work cannot be timed to avoid the tern breeding season, then the Navy should initiate a consultation with this office under Section 7 of the Endangered Species Act.

WP-15, Section 6.3, and Figure 3 on page WP-6 indicate that the Unexploded Ordnance (UXO) Demolition Site will be located at the junction of former runways 7 and 13, with an Explosive Safety Quantity-Distance (ESQD) arc of 1,250 feet. This seems to bring at least a portion of the

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least tern breeding colony area within the ESQD. If possible, the UXO Demolition Site should be located in such a manner that the least tern colony is outside the prescribed ESQD. If the UXO Demolition Site cannot be relocated, then the Navy should initiate a consultation with this office under Section 7 of the Endangered Species Act.

WP-42, Section 15.1 discusses location-specific Applicable or Relevant and Appropriate Requirements (ARARs). The Migratory Bird Treaty Act (16 U.S.C. Section 703 *et seq.*) and the Bald Eagle Protection Act (16 U.S.C. Section 668) should also be included as location-specific ARARs.

If you have any additional questions, please contact Mr. Jim Haas of my Environmental Division at (916) 414-6604.

Sincerely,

Cay C. Goude  
Acting Field Supervisor

cc: Ms. Susan Ellis, California Department of Fish and Game, Sacramento, CA  
Dr. James Polisini, California Department of Toxic Substances Control, Glendale, CA  
Dr. Ned Black, Environmental Protection Agency, San Francisco, CA  
Ms. Laurie Sullivan, National Oceanic and Atmospheric Administration, San Francisco, CA  
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