



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105  
3/09/2010

Mr. Kent Randall  
Naval Facilities Engineering Command, Southwest  
Code OPME  
2730 McKean St. Bldg. 291  
San Diego, CA 92136-5198

Subject: Silver Strand Training Complex, Draft Environmental Impact  
San Diego, CA (CEQ # 20100016)

Dear Mr. Randall:

The U.S. Environmental Protection Agency (EPA) has reviewed the subject document pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act.

EPA acknowledges the importance of military training, and the challenge of balancing training programs with environmental requirements. EPA compliments the Navy on its role in aiding the recovery of the least terns.

We have rated the Draft Environmental Impact Statement (DEIS) as Environmental Concerns – Insufficient Information (EC-2) (see enclosed “*Summary of Rating Definitions*”). We are concerned about the project’s impacts on water resources and biological resources, and about the need for waste minimization. We also request clarification of the baseline training tempo. Additional information about our concerns is provided in the enclosed detailed comments.

We appreciate the opportunity to review this DEIS. When the FEIS is released for public review, please send one (1) hard copy to the address above (mail code: CED-2). If you have any questions, please contact me at (415) 972-3521, or contact Tom Kelly, the lead reviewer for this project. Tom can be reached at (415) 972-3852 or [kelly.thomasp@epa.gov](mailto:kelly.thomasp@epa.gov).

Sincerely,

/s/

Kathleen M. Goforth, Manager  
Environmental Review Office  
Communities and Ecosystems Division

Enclosed: EPA Detailed Comments  
EPA Ratings Summary

cc: Sandy Vissman, U.S. Fish and Wildlife Service

**EPA DETAILED COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS) FOR SILVER STRAND TRAINING COMPLEX, SAN DEIGO COUNTY, CA, MARCH 2010**

**Water Resources**

*Vernal Pools*

As stated in EPA's website<sup>1</sup>, "[m]ore than 90% of California's vernal pools have already been lost. Great efforts are being made to protect the remaining vernal pools, as their disappearance marks the loss of rare and important habitat and some of the associated plant and animal species as well." At the Silver Strand Training Complex – South (SSTC-S), the vernal pools cover 3.2 acres in total (Table 3.11-1). Additionally, many contain endangered San Diego fairy shrimp "found in 11 of 25 vernal pools and salt marshes surveyed" (page 3.11-12).

In the preferred alternative, the DEIS states on page ES-10, "[t]he Navy would allow limited training involving foot traffic, but not vehicle traffic, in the vernal pools when vernal pool conditions are determined to be dry." The DEIS also states in Table 3.11-4, "[d]ry conditions would be determined by a qualified person overseen by a NBC [Naval Base Coronado] Botanist or Wildlife Biologist." While foot traffic in the vernal pools when the soil is dry and hard is unlikely to damage fairy shrimp, determining when the pools are dry enough for foot traffic is complex.

**Recommendation:**

EPA recommends the Navy work with U.S. Fish and Wildlife Service to identify the highest quality vernal pools, and fence those to minimize impacts from training.

Alternatively, EPA suggests

- the FEIS commit to an inspection of vernal pools by a wildlife biologist, prior to upland training at beach Purple 2, or
- the FEIS list the factors that will be used to determine the vernal pools are dry enough to withstand foot traffic.

*Sediment Quality*

The DEIS states on page 3.5-14, "[r]ecent sediment sampling in the San Diego Bay near SSTC-N indicates – while concentrations of some contaminants are elevated above background levels – no contaminants were present at concentrations which would adversely affect marine organisms (Port of San Diego 2002)." EPA encourages a fuller discussion of sediment sampling results near SSTC-N and any screening levels used to

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<sup>1</sup> <http://www.epa.gov/wetlands/types/vernal.html>

determine that no contaminants were present at concentrations of concern. The purpose of the sediment sampling in the report cited (San Diego Harbor Deepening EIS/EIR, USACOE, November 25, 2002) most likely was intended to characterize the quality of the sediment to be dredged, and may not have specifically addressed the sediment at SSTC-N. Even more so than dredging, underwater explosions are likely to make contaminated sediments bioavailable to fish and marine mammals.

**Recommendation:**

The FEIS should provide additional discussions of sediment sampling at SSTC-N, including a brief description of the number of samples, depth of sampling and contaminant concentrations.

## **Biological Resources**

### *Least Terns*

The DEIS discusses physical training for groups averaging 30 – 150 people (Table 2-1, page 2-24), and includes that “trainees may occasionally have a military working dog participate in the physical conditioning.” Page 3.11-39 also clarifies that military working dogs “are typically on the hard packed sand (SSTC-S) or sand road (SSTC-N), they can also be on the soft packed sand in both areas.” While federal endangered least terns may have acclimated to the presence of humans nearby, barking dogs in nesting areas does not seem prudent, particularly when exercise in the nearby hard packed sand would be much less intrusive.

**Recommendation:**

The FEIS should include a mitigation measure that avoids conditioning military working dogs in least tern nesting areas (i.e. the soft packed sand of Blue 2, Orange 1 and Orange 2).

## **Waste Minimization**

EPA recognizes the Naval Region Southwest’s commitment to sustainability, including renewable energy, water conservation, green buildings and more. We commend the Navy for “pumping seawater through its Offshore Petroleum Discharge System during training, instead of using petroleum products.” In comparison, the DEIS does not explain whether a high level of scrutiny has been applied to the explosive training exercises, although it does identify potential munitions constituents of concern and explosives residue (on page 3.4-10 and 11). EPA acknowledges that in many instances the success of training exercise may not be judged without using the actual amount of explosive also used in field conditions, however, that may not be the case for all explosives training exercises.

**Recommendation:**

The FEIS should assess the potential to reduce explosive charges in meeting its training needs.

**Clarification of Baseline Training Tempo**

Various sections of the DEIS provide information on baseline training tempo, including Table 2-1. EPA encourages a more thorough discussion of the development of the baseline training tempo, to clarify the concept. The FEIS should, for example, explain whether the values in Table 2-1 represent the amount of training conducted in a specific year or the amount of training that could be conducted given the current restrictions on training. Where the baseline training tempo is not reflective of recent training activities, EPA suggests the FEIS include a comparison with recent training activities. This will foster better understanding of the FEIS. EPA is not suggesting additional factors need to be used for comparison throughout the FEIS, only that it should link training tempo to recent levels of training at SSTC.