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07 AUG 1991

Clifford G. Day  
U.S. Fish and Wildlife Service  
927 North Main Street (Bldg. D-1)  
Pleasantville, NJ 08232

Dear Mr. Day:

Reference is made to a telephone conversation of August 1, 1991 between Ms. Dana Peters of your staff and Mr. Carl Keller of our Natural Resources Section regarding the Federally Threatened Knieskern's beaked-rush (Rhynchospora knieskernii) and its known occurrence at Naval Weapons Station Earle, Colts Neck, New Jersey (NWS).

Under the auspices of the Comprehensive Environmental Response Compensation and Liability Act (CERCLA), the Navy is compelled to investigate potential hazardous (contaminated) waste sites on Navy property. One site (3 + acres) which was identified in the Initial Assessment Study of Naval Weapons Station, Colts Neck, New Jersey, appears to contain six rare plant species, one of which is the Knieskern's beaked-rush. These species were revealed from the Rare Species Survey: Naval Weapons Station - Earle that was conducted in 1988 and 1989. The particular site (Site # 11, Contract Ordnance Disposal Area) was first investigated in 1986 through installing four soil borings and three monitoring wells as shown on enclosure (1). Sampling analysis indicated that one soil boring (Soil Boring 11-A) contained elevated oil and grease levels, and monitoring well number 11-1 revealed an elevated Pentachlorophenol concentration.

A subsequent second sampling phase in early 1991 included construction of nine additional soil borings and two additional monitoring wells in order to further evaluate the areal distribution of oil and grease contamination, suspected petroleum hydrocarbon residues, and possible movement of pentachlorophenol. Final analysis of soil sampling and monitoring well data is not yet completed, therefore it is not known exactly what, if any, future impacts to the area is expected.

According to the Rare Species Survey: Naval Weapons Station - Earle, the Knieskern's beaked-rush was found in the extreme western edge of the Site # 11 tract (enclosure 1), adjacent to trees and shrubs which shade the site for much of the day. The site is an area of open damp sand that was obviously cleared at some time in the past; it was once part of an Atlantic white cedar swamp. The survey report also identified the area as a possible toxic site; several test wells had been constructed in the vicinity during the time of the survey in 1988. It was also mentioned that encroachment by successional species would

probably eliminate its population and that periodic mowing and clearing (mid-October through mid-March) would help maintain favorable conditions for this species.

Under the Federal Facilities Agreement Under CERCLA Section 120 with the Environmental Protection Agency (Administrative Docket Number II-CERCLA-FFA-00103), the Navy is legally bound by timeframes in which to conduct sampling and any necessary remedial clean up. Reportedly, any additional testing and future work, if needed, would not continue until late September, 1991.

According to the Endangered Species Act (ESA) of 1973 as amended, Federal agencies are directed to utilize their authorities in furtherance of the Act by carrying out programs for the conservation of listed species. Accordingly, any action which may affect the continued existence of a Federally listed threatened or endangered species must undergo consultation with the U.S. Fish and Wildlife Service as stated in Section 7 of the ESA. In an effort to comply with the ESA, your assistance is requested to assess and recommend measures for resolving potential effects on the Knieskern's beaked-rush at Site # 11. Since fruiting occurs from July to September in this species (according to the Federal Register of July 18, 1991) and may best be observed during this period, we request your advice at your earliest convenience.

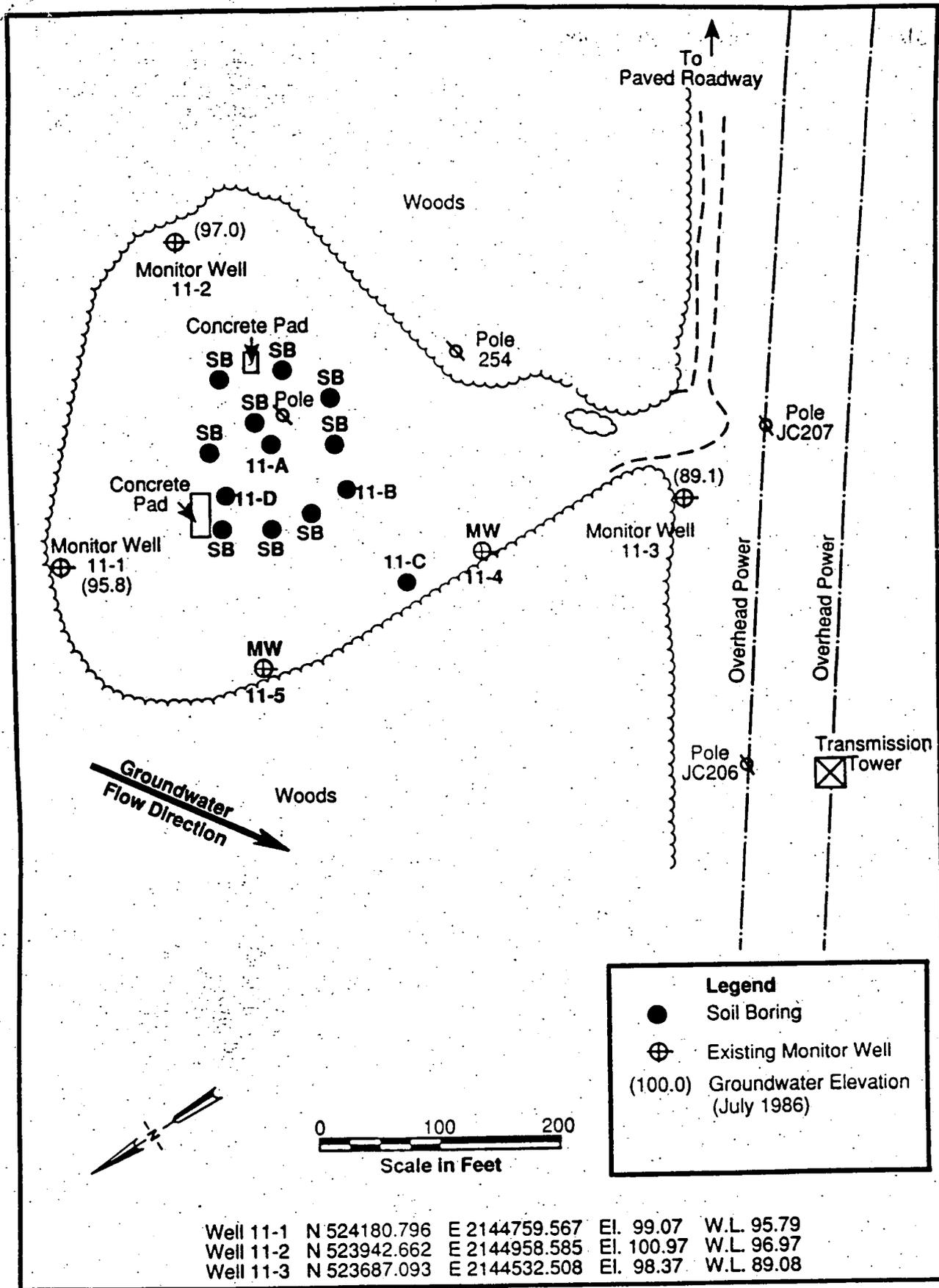
Our point of contact is Mr. Carl Keller, Wildlife Biologist at (215) 897-6207 (6:30 AM to 3:00 PM). Thank you in advance for your assistance.

Sincerely,

**WILLIAM J. SUMMERS**  
**Head, Natural Resources Section**  
**Installations Planning Division**  
**By direction of the Commanding Officer**

Copy:

J. Hoover, NORTHDIV  
NWS Code 096  
T. Gentile, NWS  
B. Matthaey, NWS



**SITE 11 - CONTRACT ORDNANCE DISPOSAL AREA  
MONITOR WELL AND SAMPLING LOCATIONS,  
NWS EARLE, NJ**

*Encl. (1)*