United States Department of the Interior

FISH AND WILDLIFE SERVICE
Pacific Islands Fish and Wildlife Office
300 Ala Moana Boulevard, Room 3-122
Honolulu, Hawai‘i 96850

In Reply Refer To:
01EPIF00-2026-0074690

April 13, 2026

Ms. Jocelyn Tamashiro, L.G.
Environmental Restoration Manager
NAVFAC Hawaii
Environmental Restoration (EV-3)
400 Marshall Road
JBPHH, Hawai‘i 96860

Subject: Review of the Draft Remedial Investigation Work Plan for Per- and Polyfluoroalkyl Substances Release at the Red Hill Bulk Fuel Storage Facility, JBPHH, Oahu, Hawai‘i

Dear Ms. Tamashiro:

The US Fish and Wildlife Service's Pacific Islands Fish and Wildlife Office (PIFWO) has received and reviewed the document entitled "Remedial Investigation Work Plan; Per- and Polyfluoroalkyl Substances Release; Red Hill Bulk Fuel Storage Facility, JBPHH, Oahu, HI," which details the work plan for a Remedial Investigation (RI) under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), primarily focusing on chemicals of potential concern (COPCs) including per- and polyfluoroalkyl substances (PFAS) and petroleum hydrocarbons. We understand that this document reflects the RI approach that was agreed upon by the Navy, the State of Hawai‘i Department of Health (DOH), and the U.S. Environmental Protection Agency (EPA) in September of 2025. We will therefore limit our comments to a brief discussion of wildlife that may be observed in the area, and remarks on co-occurring PFAS compounds.

Protected Species in the Project Area

Section 10.2.7 of the RI describes the project area as low quality and disturbed habitat characterized by non-native vegetation and introduced species. It additionally references a 1995 biological survey of the area that found no native or sensitive species, and states that "no subsequent threatened or endangered species surveys are known to have been conducted after 1995 at the Facility, and no threatened or endangered species are known or expected to be present on-site." This characterization is largely consistent with PIFWO records, though we note the potential for the Hawaiian hoary bat or Ōpe‘ape‘a (*Lasiurus cinereus semotus)* to forage in

the area, and the possible transit of Hawaiian stilt or Ae‘o (*Himantopus mexicanus knudseni)* and/or Hawaiian seabirds over the area. Please see Appendix A for our recommended avoidance measures.

Co-Occurring PFAS Compounds and PSLs

Project Screening Levels (PSLs) are addressed in Section 15.1.1 and elsewhere in the work plan. We appreciate that the discussion of PSLs recognizes both ecological screening levels and EPA Regional Screening Levels (RSLs) as informative. It is unfortunate, however, that these levels are not applied consistently; several PFAS compounds with established EPA RSLs appear either to lack PSLs or to have been assigned less conservative values. We hope that securing analytical facilities and methods with sufficiently sensitive detection limits will provide the information needed to revisit PSLs as the project advances. We also recommend that interpretation of COPC data from this RI accounts for additive effects among the PFAS compounds known to cooccur at the site. Combinations of PFHxS, PFNA, HFPO-DA, and PFBS warrant close attention, given that the EPA’s enforceable PFAS standards include a Hazard Index Maximum Contaminant Level for this set of compounds.

We are pleased to see the Red Hill site cleanup proceeding. If you have any questions about this review, please contact Fish and Wildlife Biologist Dr. Alicia Hendrix at alicia_hendrix@fws.gov or (808) 347-7524.

Sincerely,

AARON NADIG

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Date: 2026.04.13 09:31:27 -10'00'

Deputy Field Supervisor
Pacific Islands Fish and Wildlife Office

Appendix A. Comments and Recommended Avoidance Measures for Protected Species in Work Plan Project Area

PIFWO has reviewed the project area, and identified the following federally listed species:

- Hawaiian hoary bat or Ōpeʻapeʻa (*Lasiurus cinereus semotus)*
- Hawaiian stilt or Aeʻo (*Himantopus mexicanus knudseni*)
- Hawaiian seabirds (*Pterodroma sandwichensis, Puffinus auricularis newelli, Hydrobates castro*)

Ōpeʻapeʻa

Suitable foraging habitat for Ōpeʻapeʻa is present in both Areas A and B. Section 14.2-3 notes that vegetation clearance and tree trimming may occur to support drilling for soil sample collection and well installation. Ōpeʻapeʻa roost in woody vegetation across all islands and will leave their young unattended in trees and shrubs when they forage. If trees or shrubs 15 feet or taller are cleared during the pupping season, June 1 through September 15, there is a risk that young bats could inadvertently be harmed or killed, since they are too young to fly or move away from disturbance.

To avoid and minimize impacts to the endangered Hawaiian hoary bat we recommend you incorporate the following applicable measures into your project description:

- Do not disturb, remove, or trim woody plants greater than 15 feet tall during the bat birthing and pup rearing season (June 1 through September 15).

Aeʻo

Overall, no suitable wetland habitat for aeʻo occurs near RHBFSF. South Halawa stream near Areas A and B is intermittent and generally flows only after storm events; therefore, exposure risk to aeʻo is unlikely.

Hawaiian seabirds

Hawaiian seabirds may traverse the project area at night during the breeding, nesting and fledging seasons (March 1 to December 15). Outdoor lighting could result in seabird disorientation, fallout, and injury or mortality. Seabirds are attracted to lights and after circling the lights they may become exhausted and collide with nearby wires, buildings, or other structures or they may land on the ground. Downed seabirds are subject to increased mortality due to collision with automobiles, starvation, and predation by dogs, cats, and other predators. Young birds (fledglings) traversing the project area between September 15 and December 15, in their first flights from their mountain nests to the sea, are particularly vulnerable to light attraction.

To avoid and minimize potential project impacts to seabirds we recommend you incorporate the following measures into your project description:

- Fully shield all outdoor lights so the bulb can only be seen from below.
- Install automatic motion sensor switches and controls on all outdoor lights or turn off lights when human activity is not occurring in the lighted area.
- Avoid nighttime construction during the seabird fledging period, September 15 through December 15.