



United States Department of the Interior

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NAVSTA LONG BEACH
SSIC #5090.3

FISH AND WILDLIFE SERVICE

Ecological Services
Carlsbad Field Office
2730 Loker Avenue West
Carlsbad, California 92008

June 17, 1994

Mr. Duane Rollefson
Naval Station Long Beach
Code N46, Building 1, Room 268
Long Beach, California 90822-5000

Dear Mr. Rollefson:

The U. S. Fish and Wildlife Service (Service) appreciates the opportunity to comment on the Technical Memorandum No. 4, Final Implementation of Final RI/FS Sampling and Analysis Plan For Naval Station Long Beach, Long Beach, California, dated June 9, 1994. Your consideration of these comments is greatly appreciated.

Based on a review of the above-mentioned document, it would appear that most of the major issues raised after review of the previous document have been addressed. The decision matrix provided in Figure 3 allows for more balanced consideration of the significance of the biological test results. The Service encourages flexibility in this decision process, that should be amply represented in the comprehensive decision tree presented in Figure 1, to assure that all pertinent data are considered. For example, consideration of spatial patterns in the data should include results from chemical analyses as well as bioassay results.

During the monthly meeting held on June 9, Michael Lyons from the Los Angeles Regional Water Quality Control Board (RWQCB) raised concerns over the current sampling plan relative to the lack of field replicates. The Service would like to reiterate these concerns. It is of the utmost importance for proper evaluation of the results that the test samples be compatible with the reference samples. Should the current plan which includes a "pseudoreplication" of test samples not prove adequate, the Service would concur with the RWQCB that additional sampling would be required. The Service does, however, understand that under the current scheduling constraints additional sampling would not be feasible at this time.

The Service looks forward to the opportunity to coordinate further with the Navy on these issues. Should you have any questions please contact Carol Roberts of my staff at (619) 431-9440.

Sincerely,

Gail C. Kobetich
Field Supervisor