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MOFFETT FIELD  
SSIC NO. 5090.3.A

BRAC OFFICE

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August 22, 2005

Mr. Rick Weissenborn  
BRAC Environmental Coordinator, Former NAS Moffett Field  
Southwest Division Naval Facilities Engineering Command  
Base Realignment and Closure Operations  
1230 Columbia Street, Suite 1100  
San Diego, CA 92101-8517

**RE: Comments on the Draft Addendum to the Final Station-Wide Feasibility Study  
– Site 25, Former NAS Moffett Field**

Dear Mr. Weissenborn:

On behalf of Save The Bay' 10,000 members, please accept my comments on the Draft Addendum to the Final Station-Wide Feasibility Study of Site 25 at Moffett Field.

Save The Bay is the oldest and largest membership organization working exclusively to celebrate, protect and restore San Francisco Bay. Founded in 1961 to stop plans to fill in large portions of the Bay, Save The Bay has a proud history of working for a healthy and vibrant Bay the whole community can enjoy. Today, one of Save The Bay's goals is to advocate for tidal marsh restoration as envisioned by the scientific blueprint for the Bay, the *Baylands Ecosystem Habitat Goals*, to provide vital habitat for the hundreds of species that depend on San Francisco Bay.

Massive Bay fill and urbanization over the last one hundred years destroyed 90 percent of the Bay's wetlands. The Moffett wetlands were once part of a 40-mile continuous band of pristine tidal marshes along the South Bay shoreline and a critical part of the Bay's ecology. With full cleanup by the Navy, the Moffett wetlands can be restored to recreate some of the vital fish and wildlife habitat that has been lost.

For nearly five years, Save The Bay has been working with the Mountain View community to ensure that the Navy would fulfill its responsibility to the community and cleanup all its toxics in Site 25. We are pleased that the Navy finally has taken steps a cleanup alternative that would allow future tidal restoration of the Moffett Field wetlands.

Save The Bay supports Alternative 3 as described in the draft Feasibility Study, as an acceptable alternative that satisfies the Navy's responsibility for cleanup of Site 25. Following are our specific comments on the draft that should be addressed in detail in the final Feasibility Study:

**SAVE THE BAY**

**Clearly identify the exposure scenario for the identified preferred alternative (Alternative 3).**

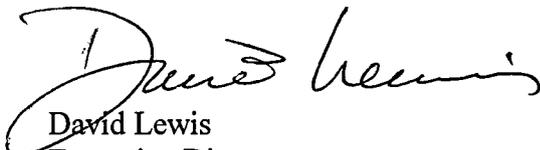
It is unclear in the draft Feasibility Study which exposure scenario is linked with the preferred alternative. Table 3 (page 22) details the remediation goals of chemicals of concern at Site 25 for the tidal marsh, managed pond and stormwater retention pond scenarios. While Navy staff have expressed in conversations with Save The Bay that the preferred alternative remediation goal for the entire site corresponds with the tidal marsh scenario, this must be documented clearly in the final Feasibility Study. As the future land use of Site 25 has not been determined, please specify the exposure scenario for the each alternative in the final Feasibility Study.

**Reduce the proposed background level of PCBs in Site 25**

Save The Bay agrees with the San Francisco Bay Regional Water Quality Control Board and the Silicon Valley Toxics Coalition that the Navy's proposed background level for PCBs should be reduced. Site 25 has been diked off from the Bay for some time, and is approximately one mile south of San Francisco Bay open water. Because Site 25 has been isolated from the Bay, it is reasonable to assume that the vast majority if not all of the PCBs present at Site 25 are due to the Navy and NASA operations. Therefore, PCB background levels should not be determined based on average PCB contamination in the Bay open water. Furthermore the Navy's analysis in the draft Feasibility Study determines that lower overall average concentrations of PCBs are achievable. In the final Feasibility Study, please reduce the proposed PCB background level and include documentation of the rationale.

Thank you for this opportunity to comment on the future cleanup of the Moffett wetlands. We look forward to working with you to ensure complete implementation of full cleanup at Site 25.

Sincerely,

  
David Lewis  
Executive Director

cc: U.S. Senator Barbara Boxer  
Congresswoman Anna Eshoo  
Lida Tan, Environmental Protection Agency  
Adriana Constantinescu, San Francisco Bay Regional Water Quality Control  
Board  
Lenny Siegel, Silicon Valley Toxics Coalition