

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

REGION 2

HEINZ AVE., SUITE 200
BERKELEY, CA 94710-2737

May 19, 1995

Commander
Department of the Navy
Engineering Field Activity, West
Naval Facilities Engineering Command
Attn: Mr. Stephen Chao, Project Manager
900 Commodore Drive, Bldg. 101
San Bruno, California 94066-2402

Dear Mr. Chao:

**NAVY RESPONSE TO AGENCY COMMENTS ON THE FEASIBILITY STUDY (FS)
REPORT, OPERABLE UNIT 1, MOFFETT FEDERAL AIRFIELD**

The Department of Toxic Substances Control (DTSC), the San Francisco Regional Water Quality Control Board (SFRWQCB) and the Department of Fish and Game have reviewed the subject response to comments. A series of conference calls have been conducted in the last two weeks to discuss the subject documents. The State is pleased to see the significant improvements of the FS. As discussed in the conference calls, the State's comments on the OU1 Ecological Assessment Technical Memorandum dated April 28, 1995 should be incorporated in the final Feasibility Study Report. In addition, the following procedures should be included in future remedial design work.

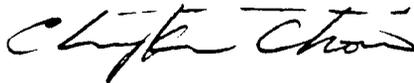
- a. Determine the total wetland acreage and the location of each wetland based on the U.S. Fish and Wildlife Service document entitled "Classification of wetlands and Deepwater Habitats of the United States (Cowardin, et al. 1979)". The primary difference between this approach to wetland identification and that presently used by the U.S. Army Corps of Engineers and the Environmental Protection Agency under the Federal Clean Water Act (CWA) Section 404(b)(1) permit program, is that the CWA definition requires the presence of all three wetland parameters (wetland hydrology, dominance by hydrophytes, and hydric soils) whereas the Cowardin definition requires the presence of at least one of these parameters. Moreover, each of the three parameters is more narrowly defined by the CWA approach than the Cowardin approach.
- b. Determine fish and wildlife values associated with the wetlands of OU-1. This would most reasonably be accomplished by a team of biologists including representatives from the U.S. Fish and Wildlife Service, the Department of Fish and Game, and the Navy, utilizing a Habitat Evaluation Procedure (modified as may be appropriate for this study).

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c. Identify a means of offsetting unavoidable impacts to OU-1 wetlands such that on net loss of wetland acreage, fish and wildlife values, or endangered species values would result from implementation of the remediation project. In this regard, the State recommends application of a habitat evaluation procedure at the mitigation site with inclusion of initial assumptions that wetland acreage will be maintained or increases, that net impacts to fish and wildlife habitat values will be avoided and that net impacts to State- or Federally-listed endangered species will be precluded. In order to avoid a net loss of wetland acreage it is necessary to create (through conversion of non-sensitive upland to wetland status) no less wetland acreage than acreage unavoidably impacted.

If you have any questions, please contact me at (510) 540-3830 to ensure a coordinated approach for all regulatory comments.

Sincerely,



C. Joseph Chou
Remedial Project Manager
Base Closure Unit
Office of Military Facilities

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