

# Regional Open Space

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MOFFETT FIELD  
SSIC NO. 5090.3.A.

December 2, 2003

MIDPENINSULA REGIONAL OPEN SPACE DISTRICT  
CELEBRATING 30 YEARS OF OPEN SPACE PRESERVATION

Ms. Andrea Espinoza, BRAC Environmental Coordinator  
Southwest Division  
Naval Facilities Engineering Command  
1220 Pacific Highway  
San Diego, CA 92132-5181  
Attn: Code 06CH.SG

RE: Comments on the Revised Feasibility Study and Remedial  
Investigation RFP Scope of Work, Moffett Federal Airfield Site 25

Dear Ms. Espinoza:

On behalf of the District, I would like to express our support for the Navy's planned Revised Feasibility Study and Remedial Investigation for Site 25, which intends to evaluate the feasibility of cleaning the site to tidal marsh standards. The Navy's willingness to listen, communicate and work with the affected property owners and interested public will undoubtedly lead to wide support and approval of the final and more thorough remediation plan.

In keeping with the effort for open communication, please review the following comments regarding the RFP discussed on Friday, November 14, 2003.

### *Human Exposure*

It is the District's understanding that the earlier Feasibility Study prepared for Site 25 factored only occasional human exposure associated with recreation. Although this assumption may have been true at the time the report was written, presently there are imminent plans for an extension of the Bay Trail through or along the edges of Site 25. In fact, NASA has indicated to the media their intention to work with Bay Trail planners to allow for such an alignment. Current Bay Trail use suggests that this trail would not only serve as a tourist and recreational opportunity, but also as a commute trail. As such, please carefully re-evaluate the risk assessment for human exposure along the current and planned trail to reflect typical commute patterns.

### *Presence of Fish in the Seasonal Pond*

You may be aware that Santa Clara County manages a sophisticated abatement program to control mosquito breeding, particularly at sites that retain large quantities of standing water such as the seasonal ponds located near the bay. The County utilizes several vector control techniques as part of its program, including the release of mosquito fish. It is conceivable that mosquito fish are being released into the seasonal pond at Site 25, which then raises the question of existing ecological risk. If this is true, fish-eating birds may currently be utilizing the site for foraging. The answer to this question may substantially affect the feasibility study and remediation objectives that will be under review.

### *Ecological Reference Locations*

When evaluating adequate reference locations for Site 25, it is important to recognize the newly acquired U.S. Department of Fish and Wildlife/California Department of Fish and Game (USFWS/CDFG) former Cargill salt pond properties given that these lands are planned for a variety of bayland habitat restoration. Reference locations may need to be larger in size and scope than Site 25 to account for the ecological diversity and habitat opportunities that will exist in the area surrounding Moffett Field.

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*Development of Feasibility Study Addendum (Section 2.3.1)*

The District recommends evaluating an alternative that involves partial tidal restoration of District land and a meandering levee to separate the area to be restored from the remaining seasonal pond. This levee may prove highly desirable since the existing USFWS/CDFG levee that currently protects NASA land is subsiding at a fairly fast pace, requiring ongoing dredging and piling of imported fill for levee maintenance. The District suggests evaluating the feasibility of constructing a permanent levee on an alignment that would protect the airfield and optimize wetlands restoration both on and off NASA property.

*Participation and Review by USFWS/CDFG*

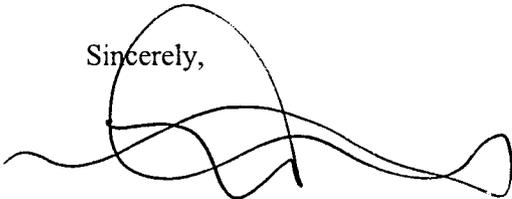
The District strongly supports the recommendation from the regulatory agencies to invite local members of the USFWS/CDFG to participate in reviewing the revised Feasibility Study and Remedial investigation. The additional input will be extremely valuable since the agencies now own and manage the neighboring properties and may offer the possibility for a joint restoration project that encompasses Site 25.

*Tidal Marsh Versus Seasonal Pond Standards*

As previously voiced, please compare the remediation requirements and costs associated with a cleanup that is consistent with tidal marsh standards versus a cleanup that is consistent with seasonal ponds standards for NASA's portion of Site 25. This evaluation may indicate a relatively minor difference, thus allowing the Navy to consider the possibility of a higher level of cleanup for the entire area, regardless of current use or the timeline for a future restoration.

The District appreciates the opportunity to review and comment on the RFP Scope of Work. Please contact Ana Ruiz, Open Space Planner, at (650) 691-1200 if you have any questions regarding our comments.

Sincerely,

A handwritten signature in black ink, appearing to be "L. Craig Britton", written over a large, loopy scribble.

L. Craig Britton,  
General Manager

LCB:ar:dw:dms

cc: MROSD Board of Directors