



California Regional Water Quality Control Board

Central Valley Region

Robert Schneider, Chair

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CROWS LANDING
SSIC NO. 5090.3.A



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NASA AMES RESEARCH CENTER, CROWS LANDING FLIGHT FACILITY, REUSE PLAN, INITIAL STUDY, MITIGATED NEGATIVE DECLARATION, AND MITIGATION MONITORING PLAN, STANISLAUS COUNTY, CALIFORNIA

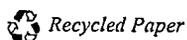
We have reviewed the *NASA Ames Research Center, Crows Landing Flight Facility, Reuse Plan* (Reuse Plan), *Initial Study* (CEQA), *Mitigated Negative Declaration* (Negative Declaration) and *Mitigation Monitoring Plan, Stanislaus County, California*, received 2 February 2001. The Reuse Plan will include general aviation, NASA training, environmental remediation, agricultural production and planning for a business park development. Stanislaus County proposes to adopt a Negative Declaration after acceptance of the Reuse Plan. The Reuse Plan states that the Negative Declaration is necessary to provide access to the federal and state governments for the environmental remediation of the site. The Reuse Plan also states that it does not address development of the site, but does address continuing the current use of the former facility (NASA/federal agencies aircraft flight training), and proposes a new use, which is general aviation.

Specific Comments:

1. Section I. Introduction, page 3, second paragraph: The text states that "...the State of California and NASA have determined that the transfer may be subject to the Comprehensive Environmental Response, Compensation, and Liability Act (42USC 9620) (CERCLA)...". Both the State and Federal governments have followed, and continue to follow, the CERCLA law for the environmental investigation and remediation at the site. Therefore, the property transfer is subject to the CERCLA law at this time. Please omit "may" and replace with "will".

2. Section II.E. Environmental Remediation Sites, page 9, paragraph one: Please add text after the first paragraph stating that, after transferring the project to Southwest Division, the Navy decided to reevaluate the entire site for the environmental investigation and remediation.

California Environmental Protection Agency



3. Section II.E. Environmental Remediation Sites, page 9, paragraph three: The text states that water table is approximately 50 feet below ground surface (bgs) beneath much of the installation. This statement appears to be inconsistent with information presented in the Final Work Plan, Revision 1, which indicates that the depth to groundwater is from 35'-85' bgs. Please revise the text to be consistent with the recent filed investigation data presented in the Final Work Plan, Revision 1.

4. Section VI. Geology and Soils, page 25, paragraph 3: The text refers to the groundwater monitoring and states that the depth to groundwater varies from approximately 35 feet to 58 feet bgs. This statement conflicts with the CEQA statement in specific comment 3. Explain this discrepancy and revise all text as needed.

5. Section XVI. Utilities and Service Systems, pages 35-36: The text describes only existing conditions under the limited usage by NASA, not the new project, general aviation. Lack of proper storm water drainage results in water flowing onto roadways during the summer irrigation and winter rainy seasons. Stanislaus County will need to comply with federal, state and local statutes by upgrading the existing non-functional sewer lines and wastewater treatment system, if general aviation usage generates additional wastewater beyond the current NASA usage, and a permit for discharge of wastewater will be required. Stanislaus County will also probably need to improve stormwater drainage at the site.

If you have any questions please contact me at (916) 255-3050 or bartonj@rb5s.swrcb.ca.gov.



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