



U.S. DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
National Ocean Service
Office of Ocean Resources Conservation and Assessment
Hazardous Materials Response and Assessment Division
Coastal Resources Coordination Branch

June 20, 1998

Mr. Alan K. Lee
BRAC Environmental Coordinator
Department of the Navy, Southwest Division
Naval Facilities Engineering Command
1220 Pacific Highway
San Diego, CA 92132-5190

Dear Mr. Lee:

The Department of Commerce/National Oceanic and Atmospheric Administration (NOAA) appreciates the opportunity to comment on the "Draft Feasibility (FS) Study Work Plan for IR Site 7, Naval Station Long Beach."

The stated objective of the FS Work Plan is to serve as the "mechanism for the development, screening, and detailed evaluation of remedial action alternatives which can be selected for the remediation of the impacted sediments at the NAVSTA Long Beach". NOAA largely agrees with this objective, and agrees that the sampling, in particular those stations added in the March 9 meeting, will aid in filling data gaps and identifying remedial action alternatives. However, at this point, NOAA still does not see the purpose of re-sampling RI with all the same analyses (benthic community analyses, 3 bioassays, and chemistry) to look for temporal change. The Final FS Work Plan should state clearly that we did not fully agree that re-sampling the RI stations was necessary.

Further, NOAA would like to clarify a point regarding the Navy's purpose of protecting the benthic community. From our meetings of February 19 and March 9, it appears that the Navy believes that the protection of the top 10 cm of sediment will fully protect the benthic community. It should be noted that some of the species found in the 1994 studies, such as clams may extend as deep as 50 cm into the sediment (Reish, 1997, Appendix N, RI Report). Others, such as *Upogebia spp.* may construct burrows deeper than 10 cm in the sediment. The potential for organisms to occur deeper in the sediment than 10 cm combined with the potential for physical disturbance below 10 cm should cause the Navy to rethink their position regarding limiting their concern to the top 10 cm.

Lastly, because the section of the FS Work Plan on analyzing the benthic data is rather vague, NOAA recommends that the Navy hold another technical meeting when sampling is completed to discuss appropriate analyses. This should aid in resolving any further issues.



I look forward to continuing working with you. If you have any questions, please call me at (415) 744-1893 or e-mail me at Laurie.Sullivan@noaa.gov.

Sincerely,



Laurie Sullivan
Coastal Resources Coordinator

cc: Martin Hausladen, USEPA
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