



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Division of Ecological Services
2800 Cottage Way, Room E-1803
Sacramento, California 95825

January 8, 1988

Mr. Tom Berkins
Regional Water Quality Control Board
San Francisco Bay Region
1111 Jackson Street, Room 6040
Oakland, California 94607

Subject: Review of Remedial Investigation/Feasibility Study Planning
Documents for the Naval Air Station, Moffett Field, Mountain View,
California

Dear Mr. Berkins:

In response to a Department of the Navy letter (5090, Ser 1142C/Moffett/NAS, December 24, 1987), the U.S. Fish and Wildlife Service (Service) is providing you with comments on the proposed Work Plan and Sampling Plan for the Moffett Field Naval Air Station Superfund Site located in Mountain View, California. As a Federal trustee for living natural resources under the Comprehensive Environmental Response, Compensation and Liability Act of 1980, as amended, the Service requests your assistance in ensuring that the Remedial Investigation/Feasibility Study adequately evaluates the hazard of contaminants, identified at Moffett Field, to fish and wildlife habitats located in the vicinity of the site.

There is evidence that the Moffett Field site and adjacent areas potentially affected by contaminant migration support significant trust resources. There are northern coastal salt marsh wetlands, freshwater and brackish water wetlands, and the San Francisco Bay National Wildlife Refuge within a one-mile radius of Moffett Field. This ecological system supports significant migratory bird populations, including 15 species of waterfowl, 10 species of shorebirds, 4 species of gull, 8 species of raptors, and numerous species of songbirds.

This ecosystem also supports four Federally listed endangered species: the salt marsh harvest mouse (Reithrodontomys raviventris), the California clapper rail (Rallus longirostris obsoletus), the California brown pelican (Pelecanus occidentalis californicus) and the American peregrine falcon (Falco peregrinus anatum). In addition, several species that are candidates for federal listing occur in the area: salt marsh wandering shrew (Sorex vagrans halicoetes), salt marsh yellowthroat (Geothlypis trichas sinuosa); Point Reyes bird's-beak (Cordylanthus maritimus subsp. palustris) and delta tule-pea (Lathyrus jepsonii subsp. jepsonii).

In summary, significant wildlife trust resources, including substantial waterfowl populations and at least eight sensitive species of flora and fauna occur within Moffett Naval Air Station's area of potential influence.

Surface waters influenced by the site include Stevens Creek, Jagel Slough, Devils Slough and Guadalupe Slough, which in turn drain into South San Francisco Bay. Jagel Slough and Devils Slough do not support any anadromous fish. As of 1981, Stevens Creek and Guadalupe Slough still supported small runs of steelhead trout (Salmo gairdneri).

As noted in the Remedial Investigation Work Plan: "Surface water and ground water flows from NAS Moffett Field into this wetland area. The flora and fauna in these wetlands represent possible receptors for any contaminants migrating from NAS Moffett Field." Considering the biologically significant habitats intertwined with the Moffett Field Superfund site, we recommend that the Remedial Investigation/Feasibility Study thoroughly evaluate the potential contaminant risk to biological resources within Moffett Field's area of influence.

Presently, the proposed sampling plan emphasizes evaluation of on-site groundwater and soil contamination and is adequate for characterizing problems in those media. However, no sampling of water or sediment in off-site surface water is proposed and no biological sampling either on-site or off-site is planned. Based on our review of the Work Plan and Sampling Plan, past use and disposal of hazardous substances at four sites (Site 1 - runway landfill, Site 2 - golf course landfill, Site 3 - Marriage Road ditch, and Site 11 - engine test area) on Moffett Field may have contaminated or have the potential to contaminate wetlands and/or surface waters at the northern boundary of this site. Because no verification or confirmation sampling has been conducted in these biologically sensitive areas, we recommend the following tasks be included in the Remedial Investigation/Feasibility Study Work Plans:

1. Wet season and dry season chemical analysis (trace element, PCB, and base/acid/neutral compounds) of surface water and sediment from Devils Slough, Jagel Slough, Stevens Creek, and the San Francisco Bay National Wildlife Refuge.
2. Chemical analysis of water and sediment samples collected from wetlands located just north of the runway landfill site. Samples should be collected immediately after winter rains have increased ponding.
3. Perform bioassays using a sensitive fish species on surface waters at the terminus of Marriage Road ditch and the Perimeter Canal which drains into Guadalupe Slough. A set of bioassays should be conducted in both the wet and dry season and should correspond to chemical analysis of surface water samples from these locations. Performance of the wet season bioassay and chemical analysis should coincide with the first winter rains.

We appreciate the opportunity to comment on the Remedial Investigation/Feasibility Study during this planning phase. If you have any questions regarding our comments please contact Don Palawski of my staff at (916) 978-4613.

Sincerely,


for James J. McKeivitt
Field Supervisor

cc: ARD-FWE, FWS, Region 1, Portland, OR
NOAA, Seattle, WA (Attn: Sharon Christopherson)
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U.S. EPA, Region IX, San Francisco, CA (Attn: Lewis Mitani)
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