

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

REGION 2
700 HEINZ AVE., SUITE 200
BEP OAKLAND, CA 94710-2737

June 22, 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:

**SUMMARY OF THE OPERABLE UNIT 1 FIELD TRIP, MAY 17, 1995, MOFFETT
FEDERAL AIRFIELD**

Enclosed is the summary of the OU1 Field Trip, May 17, 1995 prepared by the Department of Fish and Game for your consideration. If you have any questions, please contact me at (510) 540-3830.

Sincerely,

A handwritten signature in cursive script, appearing to read "C. Joseph Chou".

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

Enclosure

cc:

Mr. Bob Radovich
Environmental Specialist/Wetlands Coordinator
Department of Fish and Game
Environmental Services Division
1416 Ninth Street
Sacramento, California 95814

Mr. Michael Bessette
Regional Water Quality Control Board
2101 Webster Street, Suite 500
Oakland, California 94612

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Mr. Michael D. Gill
U.S. Environmental Protection Agency
Region IX, Mail Stop H-9-2
75 Hawthorne St.
San Francisco, California 94105

Ms. Sandy Olliges
Assistant chief
Safety, Health and Environmental Services
National Aeronautics and Space Administration
Ames Research Center
Moffett Field, CA 94035-1000

Mr. Peter Strauss
MHB Technical Associates
1723 Hamilton Avenue, Suite K
San Jose CA 95125

Memorandum

Dr. Joseph Chou
Department of Toxic Substances Control
700 Heinze Avenue, Suite 200
Berkeley, California 94710

Date : June 7, 1995



From : Department of Fish and Game

Subject : Summary of Issues Identified During Our Field Trip of May 17, 1995 to Landfill #2, Moffett Navel Air Station (MNAS)

It seems that there are two primary issues involved: The difference in wetland recognition criteria used by the Department of Fish and Game (DFG) and those used by the Corps of Engineers (COE); and the fact that the PRC study of wetland resources on the fill appears to understate both the area of COE's regulatory authority and the wetland area which would be identified given application of DFG criteria ("Classification of Wetlands and Deepwater Habitats of the United States", Cowardin et al., 1979; U.S. Fish and Wildlife Service publication FWS/OBS-79/31).

It is important for you to realize that wetlands identified per the COE's criteria will always be a subset of those identified per the Cowardin criteria. In the case of the subject fill the two approaches will yield a difference in identified wetland acreage which is, in my opinion, unlikely to exceed two or three thousand square feet. For your information I've attached a Department Administrative Report which Department of Toxic Substance Control (DTSC) personnel may find useful. It translates the Cowardin approach into a more easily understood terminology, while rigorously maintaining the Cowardin wetland identification criteria.

I attempted to make it clear to PRC staff that the DFG recommends a redelineation of wetland resources on the landfill using Cowardin recognition criteria, and that the DFG recommends that removal of wetlands at the landfill (the due to capping) be offset such that no net loss of either wetland acreage or wetland habitat value would result from proposed remedial action. As I previously indicated to you, in order to eliminate a net loss of wetland acreage it is necessary to convert no less non-sensitive upland to wetland status than that wetland acreage impacted at the remediation site. The tentatively proposed mitigation site, and the proposed character of the mitigatory wetlands (saltmarsh), are acceptable to DFG.

The specific issues and areas of concern which I identified and conveyed to PRC staff are as follows:

1. The first area of question which I noted is a small roughly circular depression with an approximately 15-foot diameter. This area was dominated by a low growing herb with arrow-like leaves. I am not familiar with this species, but based upon the fact that it selectively dominates a rather small depression surrounded by (essentially)

SUMMARY OF ISSUES IDENTIFIED DURING THE
17 MAY 1995 FIELD TRIP TO LANDFILL #2
PAGES 2 AND 3

THE ABOVE IDENTIFIED PAGES ARE NOT
AVAILABLE.

EXTENSIVE RESEARCH WAS PERFORMED BY
NAVFAC SOUTHWEST TO LOCATE THESE
PAGES. THIS PAGE HAS BEEN INSERTED AS A
PLACEHOLDER AND WILL BE REPLACED
SHOULD THE MISSING ITEMS BE LOCATED.

QUESTIONS MAY BE DIRECTED TO:

DIANE C. SILVA
RECORDS MANAGEMENT SPECIALIST
NAVAL FACILITIES ENGINEERING COMMAND
SOUTHWEST
1220 PACIFIC HIGHWAY
SAN DIEGO, CA 92132

TELEPHONE: (619) 532-3676

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COE jurisdictional wetlands and Cowardin wetlands possess a hydrology which promotes the presence of a substrate which is too wet, too long to permit year round dominance by upland plant species. Thus, the vegetative requirement for wetland identification per the Cowardin approach is satisfied in these areas and they should be identified as wetlands. For these reasons, I requested that PRC designate as wetlands for impact assessment and mitigation purposes the union of those portions of the road site identified as jurisdictional wetlands by COE personnel and those additional areas which are at least periodically dominated by plants which are at least FAC wetland indicator species per the USFWS plant list. The reason for this somewhat detailed explanation of the rationale for DFG wetland identification in this area is to convey clearly to you and other DTSC staff exactly those considerations involved in our wetlands determinations in the generality, and how they can defensibly differ from COE determinations. In the case of the wetlands associated with this road the difference between wetlands identified per Cowardin and per COE criteria likely amounts to no more than several hundred square feet.

6. The irrigation ditch along the golf course is a wetland per Cowardin criteria and per COE criteria. That this wetland is not a COE jurisdictional wetland has nothing to do with its vegetative, hydrologic, and soils characteristics. Rather, the COE simply doesn't generally regulate uses in irrigation channels. This ditch, which is referenced by the USFWS comment which you showed me, should be identified as wetland on PRC maps of base resources. Moreover, if this wetland is negatively impacted, then a means of mitigating impacts should be incorporated, and the identified means of mitigating these impacts must be sufficient to offset a net loss of either wetland acreage or wetland habitat values (per the methodology briefly discussed in my May 12, 1995 memorandum to you). It is my understanding that this ditch is proposed for retention by the evolving base closure plan. This being the case, it should be identified as wetland and simply left alone. One last issue according to PRC, was the potential presence of a damsel fly of special concern in the ditch. Has PRC determined its presence or reasonably determined its absence, and, if present, what is the relationship between the habitat requirements of the damsel fly and the ongoing ditch maintenance program? To the extent this species is present, it may be desirable to coordinate with the navy and to devise a maintenance program which satisfies both the navy's desire for flow capacity retention and the habitat needs of this species.

Thank you for the opportunity to inspect and comment upon several wetland issues at MNAS. Although the difference between the COE wetland determination on the landfill and that of the DFG seemingly amounts to less than a quarter-acre, we believe that the identification of wetland resources per the Cowardin approach is a vital issue with respect to toxic substances remediation efforts and with respect to subsequently derived base closure and

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re-use plans. It is also important to stress that the PRC mapping of wetland resources on the landfill is at present inadequate, and that any PRC remapping effort for the landfill should occur within the next two weeks or so, since the wetlands already show signs of seasonal desiccation and will soon be much more difficult to distinguish.

Should you have any questions regarding this memorandum, please contact me by writing to the Department of Fish and Game, Environmental Services Division, 1416 Ninth Street, Sacramento, California 95814, or by telephone at (916) 653-9757.



Bob Radovich, Environmental Specialist/
Wetlands Coordinator

cc: Mr. Mike Martin
Department of Fish and Game
Monterey, California

Mr. John Turner
Department of Fish and Game
Sacramento, California

Ms. Laura M. Valoppi
Department of Toxic Substance Control
Sacramento, California

Mr. Jim Haas
U.S. Fish and Wildlife Service
Sacramento, California