

National Aeronautics and  
Space Administration  
**Ames Research Center**  
Moffett Field, CA 94035-1000

N00296.002620  
MOFFETT FIELD  
SSIC NO. 5090.3



DQH: 218-1

Reply to Attn of:

DEC 05 1995

Mr. Stephen Chao  
Department of the Navy  
Western Division  
Naval Facilities Engineering Command  
900 Commodore Way, Building 208  
San Bruno, California 94066-0720

Dear Mr. Chao:

Thank you for the opportunity to review and comment on the Navy's *Draft Phase II Site-Wide Ecological Assessment* (SWEA) Report. NASA has reviewed the document and would like to offer the following comments:

1. Page ES-5, PROJECT OVERVIEW, Site Setting, 3rd paragraph, 4th sentence.  
The relevancy of the delay of the remediation activities at the flux ponds, in relation to the SWEA report, is questioned, especially since the project has been completed.
2. Page ES-6, PROJECT OVERVIEW, Site Setting, 2nd paragraph, 1st sentence.  
The document states that large upland areas of the base are paved or minimally landscaped, which does not provide valuable habitat. It should be noted, however, that the Shenandoah Plaza area provides a large landscaped area (extensive lawn and mature trees) which provide habitat for wildlife species, especially colonies of urbanized birds. The figures which depict upland conditions should be revised to include the Shenandoah Plaza area (Figures 5-2 through 5-7).
3. Page ES-11, PROJECT OVERVIEW, Results, Air Chemistry, 2nd paragraph, last sentence.  
Please clarify the method of owl displacement. The owls were "passively relocated" from the burrows, outside of the breeding season.
4. Page ES-12, PROJECT OVERVIEW, Tissue Chemistry, 2nd paragraph.  
Were sufficient insect samples collected for analysis to definitively state that "these COPECs" were not detected? Reference: Draft Phase II Site-Wide Ecological Assessment, Page 3-10, Section 3.2.5.2.

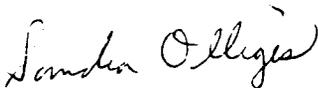
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5. Page ES-14, PROJECT OVERVIEW, Bioassays, 4th paragraph, 3rd sentence.  
The removal of "these" would aid in reading the following sentence.  
"Within ~~these~~ each group, the sediment samples could be further divided."
6. Figures ES-1, 2-2, 2-3 and 4-3.  
These figures show the Mid-Peninsula Open Space District property, however, all other figures do not. It would be helpful if all the figures delineated the property boundary, as they do for the Cargill Evaporation ponds etc. Please label all figures consistently throughout the document.
7. Page 2-12, Section 2.3.4.4 Phase I Conclusions, 4th paragraph.  
The remediation activities at the flux ponds are now completed.
8. Page 3-1, fourth bullet.  
The use of the term "tropic consumer" is not linked to receptor, endpoints, or other terms that are more consistently used. It is recommended that the term be changed to keep the document consistent. Other terms need to be used consistently as well, between figures and text. As an example, benthos is not in figure 6-1.
9. Page 3-2, line 3.  
The term "integrating" is used. It is unclear how this is accomplished. Please elaborate on how the "integration" is done.
10. Page 3-2, line 6.  
The term "characterization" in the topic sentence is vague. What is characterized, the weight-of-evidence approach? Change in measurement endpoint? Please clarify.
11. Pages 3-8 and 3-10.  
A justification is provided on pickleweed, but not for insects or earthworms. Recommend providing the same information for the other two life forms.
12. Page 3-11.  
Please indicate why the survey points are referenced in this section. Will these survey points be repeatedly visited in the future? If so, the document should state this, otherwise, it does not appear to be relevant to the Phase II SWEA.
13. Pages 3-16 through 3-18.  
This section is on Objectives and Methods, however, results are also provided. These results should be part of the extent of contamination section. Placing results here makes it difficult for the reader to understand the importance of the information.

14. Page 4-5, Section 4.2.  
Information on receptor species life histories would be helpful in the later half of this section.
15. Page 4-7, last paragraph.  
Please specify which methods (e.g., COE 1987 manual, COE-SCS-USFWS 1989 manual, Cowardin et al.?).
16. Table 4-5.  
The table title and description in the text do not match.
17. Figure 5-5.  
The results of NASA's Surface Soil Lead Survey should be included in this figure, and the lead concentrations should be taken into account in exposure assessments.

Thank you for the opportunity to comment on this *Draft Phase II Site-Wide Ecological Assessment* Report. If you have any questions regarding these comments, please feel free to call me at (415) 604-3355 or Tina Pelley at (415) 604-1315.

Sincerely,



Sandra Olliges, Assistant Chief  
Safety, Health and Environmental Services Office

cc: Elizabeth Adams, U.S. EPA  
Michael Gill, U.S. EPA  
Joseph Chou, DTSC  
Derek Whitworth, DTSC  
Michael Bessette, RWQCB  
Don Chuck, Navy Moffett Field  
Mike Young, PRC  
Eric Madera, Raytheon Co.  
Tom Jones, Schlumberger Corp.  
Peter Strauss, MHB  
Laura Vollopi, DTSC  
Chris Petersen, Montgomery Watson