



Cal/EPA

September 5, 1996

Department of
Toxic Substances
Control

700 Heinz Avenue
Suite 200
Berkeley, CA
94710-2737

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

Pete Wilson
Governor

James M. Strock
Secretary for
Environmental
Protection

Dear Mr. Chao:

**THE DRAFT FINAL RECORD OF DECISION (ROD), OPERABLE
UNIT-1, MOFFETT FEDERAL AIRFIELD**

Enclosed please find comments prepared by the California Department of Fish and Game (DFG) for your consideration. Please incorporate all comments in the final OU1 ROD. If you have any questions regarding these comments, please call me at 510-540-3830.

Sincerely,

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

Enclosure

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

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

Ms. Patricia Velez
California Department of Fish and Game
20 Lower Ragsdale Drive, Suite 100
Monterey, California 93940



Mr. Stephen Chao
September 5, 1996
Page 2

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

Mr. James G. McClure, Ph.D.
Moffett Field RAB, THE Committee
c/o Harding Lawson Associates
P.O. Box 6107
Novato, California 94948

Memorandum

To : Mr. Joseph Chou
California Environmental Protection Agency
Department of Toxic Substances Control
700 Heinz Avenue, Building F, Suite 200
Berkeley, California 94710



Date : August 29, 1996

From : Department of Fish and Game

Subject : Review of the Moffett Federal Airfield Draft Final Operable Unit 1, Record of Decision (dated June 7, 1996) (5920/60120/NTX 405 00:23)

This memorandum is in response to your resource request dated July 26, 1996, requesting review of the subject document. This Draft Final Operable Unit 1, Record of Decision (ROD) provides documentation on the selected remedial action for Operable Unit 1 (OU1) at Moffett Field in Mountain View, California. This ROD addressed the OU1 (which consists of Site 1 - Runway Landfill and Site 2 - Golf Course Landfill) landfill refuse, leachate, surrounding groundwater, adjacent surface water, and landfill gases. As a State of California natural resource trustee agency, the Department of Fish and Game (DFG) recommends that the following specific comments and concerns be addressed to ensure that State trust natural resources, including fish, wildlife species, biota, and their habitats, are protected.

Specific Comments

1. Section 2.6.2 Ecological Assessment Summary (pages 20-21)

In the Navy's evaluation of Sites 1 and 2, it was found that these sites consisted of "disturbed, low-value habitats that support predominantly non-native plant and animal species." Please specify the type of habitat(s) that will be destroyed during capping and identify these non-native plants and animal species that will be impacted.

Please elaborate on the reason why "extensive trapping" was not done in the pickleweed areas to confirm or deny the presence of the salt marsh harvest mouse.

What is the status of the "replacement plan" that the U.S. Fish and Wildlife Service recommended the Navy prepare?

Pertaining to the statement "Filling small segments of potential wetlands will be required to cap the Site 1 landfill" please specify on the size of these small segments.

2. Section 2.8.2.1 Long-term Effectiveness and Permanence (page 30)

Please define what is meant by "short-term impacts" in the statement "...Alternative 2 or 3 would destroy any current habitats at OU1, these are expected to be short-term impacts."

Mr. Joseph Chou
August 29, 1996
Page 2 of 2

3. Section 2.8.2.3 Short-term Effectiveness (pages 31-32)

Pertaining to the "active revegetation," DFG requests consultation on the specific vegetation plans, schedules, and measures of success.

4. Section 2.10 Selected Remedy (pages 36-40)

DFG concurs with the selection of Alternative 2, with the listed specified modifications, for the final remedial alternative for OU1.

Thank you for the opportunity to comment upon the subject document. Staff from the DFG's Military Facilities Team should be included in any further discussions and document review pertaining to this Record of Decision for Operable Unit 1 at Moffett Federal Airfield. If you have any questions regarding this memorandum, please contact Ms. Patricia Velez, Senior Biologist, Military Facilities Team, California Department of Fish and Game, 20 Lower Ragsdale Drive, Suite 100, Monterey, California, 93940 or by telephone at (408) 649-2876.



Patricia Velez
Senior Biologist
Moffett Federal Airfield, Program Manager

cc: California Department of Fish and Game

Mr. John Turner
Sacramento

Ms. Jennifer Decker
Sacramento