

**SAN FRANCISCO BAY CONSERVATION AND DEVELOPMENT COMMISSION**THIRTY VAN NESS AVENUE, SUITE 2011  
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December 28, 1998

Timothy E. Mower  
Installation Coordinator  
Tetra Tech EM Inc.  
1099 18th Street, Suite 1960  
Denver, Colorado 80202

**SUBJECT:** Proposal to Revise Northern Route of Proposed  
Bay Trail in Connection with Landfill Site 1, Moffett  
Federal Airfield, California  
BCDC Consistency Determination No. CN 11-97;  
BCDC Consistency Determination No. CN 7-94;  
NASA File No: DQH: 218-1

Dear Mr. Mower:

I am writing in response to your letter dated October 13, 1998 and our subsequent phone calls regarding the suggestion by NASA to relocate a small portion of the San Francisco Bay Trail, adjacent to the Site 1 Landfill, at Moffett Federal Airfield in Santa Clara County. The relocation would move an approximately 2,300-foot stretch of the proposed Northern Alignment of the Trail, as it is presently shown in the "Moffett Field Comprehensive Use Plan" (hereinafter, "Comprehensive Use Plan"), which BCDC approved in a Letter of Agreement dated December 30, 1994 (BCDC Consistency Determination No. CN 7-94), to the north and east of Site 1.

The primary purpose of the new location is to increase public safety by removing the trail location from the top of the landfill to an area adjacent to it. A secondary purpose is to enhance public access to the Bay. The original Northern Alignment location would proceed along the southern perimeter of Site 1, directly on top of the landfill, and would not have a direct view of the Bay. In the proposed new alignment, the Trail would proceed along a perimeter road to the north and east of the landfill site, directly abutting an existing salt pond.

As we stated in our August 12, 1997 letter to NASA, our greatest concern regarding the landfill project is that it could have negative impacts on the Northern Alignment route, thus creating an inconsistency with the McAteer-Petris Act, with *San Francisco Bay Plan* policies on public access and recreation, and with the Comprehensive Use Plan. Since the proposed relocation involves only a minor reorientation of the Northern Alignment of the Bay Trail to a position closer to the Bay, we believe it would be an improvement over the former location, and would still be consistent with *San Francisco Bay Plan* policies and with our original Letter of Agreement regarding the Comprehensive Use Plan. I understand that if future studies for the Bay Trail reveal deterrents to the proposed new location, the original southwest location can still be used.

Dedicated to making San Francisco Bay better.

We do have some concerns which are briefly discussed below:

1. **Public Access, Visual Access and Wildlife Protection.** Since the proposed new location would border an existing salt evaporation pond to the north, moving the Bay Trail to this position would permit users of the Bay Trail immediate physical access to the Bay shore and a direct view of the salt pond and its wildlife. This would not be possible in the southwest location. In this respect the new location would support Bay Plan policies which provide that improvements should be designed and built to encourage movement to and along the shoreline, and that maximum efforts should be made to provide, enhance or preserve views of the Bay and shoreline.

This area is shown on Bay Plan Map No. 8 as a waterbird habitat area of medium value. The discussion of Wetlands and Wildlife Constraints on page 15 of the Comprehensive Use Plan indicates that this portion of the wetland does not likely harbor burrow owl or fork-tailed damselfly, two species of concern for this area. However, there has been no analysis for the salt marsh harvest mouse, the clapper rail, or other species of concern which may also be in the area. Our evaluation of the potential impacts on waterbirds and other wildlife should await a more detailed study of the locale, which we assume will be made before the final siting of the Bay Trail.

Because the perimeter road is closer to the salt pond than the original Bay Trail location, the potential for impacts to wildlife in the salt pond from Trail users is proportionately greater. In areas where wildlife may be sensitive to an intrusion, the Bay Plan calls for careful evaluation in consultation with appropriate agencies to determine the best location and type of access in such natural areas. In addition, BCDC's Public Access Design Guidelines provide that public access should be provided adjacent to marshes, salt ponds and wildlife areas only in a way that respects the natural values. For this reason, we strongly recommend that both prospective locations of this portion of the Northern Alignment be retained as viable options until the appropriate studies have been performed and a decision is made as to whether the new northeastern location would have significant adverse impacts on nearby wildlife.

To protect wildlife in the salt pond in the near future, we recommend that as soon as the perimeter road has been installed, signage be placed at intervals along the road so that users of the road will know they are in a sensitive wildlife area and will comport themselves accordingly.

2. **Fencing.** You have mentioned that when the Bay Trail is constructed, a 6-foot-high wire or chain link fence will be installed between the road and the landfill site and that the implementation of BCDC-approved design standards for the fence would be acceptable to NASA. The purpose of the fence would be to prevent the public from walking upon the landfill, to increase public safety and reduce impacts on the landfill cap. While BCDC is in agreement with these goals, we wish to express two areas of concern with the fence. First, any fence in the area can detract from the appearance of the natural setting. We suggest that the fence be designed to be as inconspicuous as possible. For example, it could be constructed of wood uprights and unobtrusive wire. If the wire must be chain link it might be painted black or green. Perhaps it may also be possible to reduce the fence's height from 6 feet to 5 feet without decreasing the safety aspects.

Second, unless constructed carefully, a fence could prevent access to the salt pond by animals in the area. We recommend that any fence placed in this area be constructed so that small animals can easily pass below the bottom of the fence.

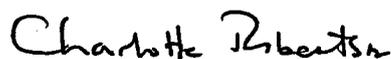
In light of these two considerations, we request that, when the Bay Trail is being designed, BCDC be consulted on fence design as well as other aspects of Bay Trail installation in this area.

- 3. Safety of Site for Public Use.** The plans you submitted show a gas venting trench near the proposed northeastern location and no gas vents along the original southwestern location. We question the safety of locating the Bay Trail next to a gas venting area. On the other hand, as mentioned above, the southwestern location would be constructed right on top of the capped site. It could thus be less safe from the point of view of both public welfare and the stability of the hazardous materials containment. These factors should be weighed when the final decision about Bay Trail siting is made.

We still have concerns about the overall potential of this project to interfere with the placement of the Bay Trail Northern Alignment to either the south or the north of the landfill. Regardless of the eventual decision regarding this small portion of the proposed Bay Trail, the entire site must provide adequate safety for Bay Trail users. At one time, we requested documentation on the safeguards that will be used to ensure that the project will not have a negative impact on the proposed Bay Trail. If this information is available we would appreciate receiving a copy.

Thank you again for offering BCDC an opportunity to comment on the suggestion of a new location for this portion of the Bay Trail. We appreciate your diligence in keeping us informed and involved in the site design process.

Very sincerely yours,



CHARLOTTE ROBERTSON  
Coastal Program Analyst

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cc: National Aeronautics and Space Administration, Attn: Sandy Olliges  
U. S. Army Corps of Engineers, Attn.: Regulatory Functions Branch  
San Francisco Bay Regional Water Quality Control Board, Attn.: Michael Arquette  
Certification Section  
Environmental Protection Agency, Attn: Clyde Morris, W-7-2  
Santa Clara County, Attn: Planning Department  
California Department of Toxic Substances Control  
California Department of Fish and Game, Attn.: Rick Parmer  
U.S. Fish and Wildlife Service  
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