

**APPENDIX I**  
**RESPONSES TO COMMENTS ON DRAFT AND REVISED DRAFT RD/RAWP**



**NAVY RESPONSES TO COMMENTS (REVISED)**  
**DRAFT REMEDIAL DESIGN/REMEDIAL ACTION WORK PLAN**  
**REMEDIAL ACTION AT IR SITE 25**  
**FORMER NAS MOFFETT FIELD**  
**MOFFETT FIELD, CALIFORNIA**  
**MARCH 2011**

No.	Page	Section	Para-graph	Comment	Navy Response
<i>Comments from Sarah Kloss, United States Environmental Protection Agency, dated 21 April 2011</i>					
<b>General Comments</b>					
1	-	-	-	The current Remedial Design for IR Site 25 includes excavation of all the polygons where the do-not-exceed remediation goals are exceeded. The RD should also include a final site-wide average calculation, with confirmation samples results factored in, to confirm that the site-wide average goals have been met.	Concur. The site-wide average remediation goals (RGs) have been included in the RD/RAWP (Table 1) and will also be considered during confirmation and borrow area sampling, which will be presented in the Remedial Action Completion Report.
<b>Specific Comments</b>					
1	1	1.0	-	Please add the CERCLIS ID to the introduction.	The following sentence has been added as the second sentence to Section 1.1:  <i>The CERCLA Information System Identification number is CA2170090078.</i>
2	2	1.1	-	The final paragraph should state that the cleanup goals from the ROD are based on a tidal marsh reuse scenario.	Concur. Text has been modified to reflect comment.
3	4	1.3	-	NASA is not a party to the FFA. Also, for consistency, please refer to the USEPA and the Water Board as the "regulatory agencies" in the final sentence in paragraph 1 and the second to last sentence in paragraph 2.	Concur. Text has been modified to reflect comments.
4	4	1.4	-	Please spell out T&D in paragraph 2 before using it as an acronym.	Comment noted. "T&D" was defined previously in Section 1.2, 3 <sup>rd</sup> para.
5	13	3.1.4	-	It is not clear if stabilization will be used if additional leach tests show the excavated sediments are a hazardous waste. Please clarify. Also, please specify the stabilizing reagent that will be used.	Comment noted. As indicated in the third sentence of Section 3.1.4, leachability data developed during the fall 2010 pre-design investigations indicated that lead and zinc in sediment samples collected at IR Site 25 do not appear to leach, and therefore treatment may not be necessary (KCH, 2011). Discussions with waste disposal experts have echoed this.  Initial discussions with waste vendors indicate that for the anticipated volume of sediment to be removed (33,000 CY), most non-haz waste disposal facilities will require 132 samples to be

**NAVY RESPONSES TO COMMENTS (REVISED)**  
**DRAFT REMEDIAL DESIGN/REMEDIAL ACTION WORK PLAN**  
**REMEDIAL ACTION AT IR SITE 25**  
**FORMER NAS MOFFETT FIELD**  
**MOFFETT FIELD, CALIFORNIA**  
**MARCH 2011**

No.	Page	Section	Para- graph	Comment	Navy Response
					<p>collected. Four-way composites will be created, resulting in 33 samples to be tested for total metals including lead and zinc. Leaching tests will be conducted if warranted, per Title 22 of the California Code of Regulations. (This language was added to Section 4.3 of Revision 2: Draft RD/RAWP).</p> <p>Should testing and market considerations warrant on-site treatability, the Navy will develop a location to conduct the operation, based on volume and specific conditions. At this time, based on previous leachability test results of high-lead soil samples (that yielded v. low dissolved lead), no on-site soil treatment is planned.</p>
6		SAP, Work Sheet #11	Step 7	<p>The rationale for the confirmation sampling design is unclear. This section specifies that four confirmation samples will be obtained for areas larger than 40,000 ft<sup>2</sup>. Most areas above 40,000 ft<sup>2</sup> are close to that lower bound of 40,000 ft<sup>2</sup>. However, Figure 3 lists one area significantly larger than 40,000 ft<sup>2</sup>, Area A4.1, which has an area of approximately 99,000 ft<sup>2</sup>. If the goal is to have the number of samples approximate to one sample per every 10,000 ft<sup>2</sup>, this area will need more samples. Please add more information about why the approximate 10,000 ft<sup>2</sup> area was chose and justify coverage in areas where the sampling density will be less.</p>	<p>Comment noted. SAP WS#18 and SAP Figure SP-4 will be edited to add samples to area A4.1 to bring the total number to 10 samples, i.e., approximately 1 per 10,000 ft<sup>2</sup>. A frequency of one sample per 10,000 ft<sup>2</sup>, correlating to an area of 100' by 100', is more conservative than the 160-foot grid used in characterizing the northern and central portions of the SWRP and the 80-foot sample grid used in the southern portion of the SWRP and in the EDM. SAP WS#18 and SAP Figure SP-5 will be edited to add samples two samples to area A5.2, resulting in 6 samples for an area of 59,690 ft<sup>2</sup>. SAP WS#18 and SAP Figure SP-10 will be edited to add samples at A10.42, resulting in 5 samples for an area of 54,344 ft<sup>2</sup>.</p>
<p><i>Comments from Elizabeth Wells, California Regional Water Quality Control Board, San Francisco Bay Region, dated 16 May 2011</i></p>					
<p><b>General Comments</b></p>					
1	-	-	-	<p>Include the site-wide average remediation goal wherever the do-not-exceed goal is listed, discussed, or presented in the Draft Work Plan. The removal action must meet both remediation goals.</p>	<p>Concur. Text edits have been made to reflect comment.</p>

**NAVY RESPONSES TO COMMENTS (REVISED)**  
**DRAFT REMEDIAL DESIGN/REMEDIAL ACTION WORK PLAN**  
**REMEDIAL ACTION AT IR SITE 25**  
**FORMER NAS MOFFETT FIELD**  
**MOFFETT FIELD, CALIFORNIA**  
**MARCH 2011**

No.	Page	Section	Para-graph	Comment	Navy Response
2	-	-	-	Justify the use of Water Board ESLs as the screening criteria for import fill. The shallow soil ESLs referenced were calculated for protection of human health. While these can be used as a preliminary screening tool to assess the potential for risk to humans from contaminants at a site, it is not appropriate to apply them for ecological receptors, which are present at this site.	Comment noted. The use of Water Board ESLs was originally proposed for import backfill soil material. Because the revised draft RD/RAWP proposes the use of on-site borrow soil, the borrow material will be analyzed for the site-specific COECs and results will be compared to the do-not-exceed (upper bound) RGs on an individual basis, to attain the site-wide average (lower bound) RGs as defined in the ROD (Navy, 2010) for IR Site 25. SAP Worksheet #15 will be updated to reflect this.
3				Include a description of the dewatering plan to be used to remove standing water from the ponds. At a minimum, this plan should include the volume of water to be moved, a description of the receiving water (location, use, connection to San Francisco Bay, wildlife, etc.), proposed sampling program, and method of pumping to prevent transfer of contaminants to the receiving water.	Comment noted. Based on observations from summer 2010, the volume of water to be removed is estimated to be 100,000,000 gallons. The Navy will divert water within the confines of IR Site 25, as described in Section 4.2.2, <i>Diversion of SWRP Water</i> , which has been re-written. Alviso Pond A2E will NOT be used as a receiving water body.  For information on monitoring and sampling during SWRP dewatering, please see response to Water Board comment no. 2 on the Revised Draft RD/RAWP.
<b><i>Specific Comments from Elizabeth Wells, Water Board</i></b>					
1	7	2.0	2 <sup>nd</sup> full para.	Clarify the last sentence. It appears that a sentence is missing.	Comment noted. The last sentence was a fragment of a paragraph that was edited out. The sentence has been removed.
2	-	3.4	-	Expand the description of the operations and maintenance activities to be performed. Describe the work activities, reporting, and schedule.	Comment noted. The Navy will coordinate with USACE, USFWS, CDFG, and MSROD in developing appropriate eco-monitoring criteria. NASA has recently reiterated that the EDM and SWRP will continue to be used for storm water management rather than tidal marsh. However, the Navy will clean up to the higher tidal marsh standard. The EDM is a key element of the NASA ARC infrastructure for stormwater management and will become even more important with sea level rise  A salt marsh habitat restoration plan is presented as Appendix H

**NAVY RESPONSES TO COMMENTS (REVISED)**  
**DRAFT REMEDIAL DESIGN/REMEDIAL ACTION WORK PLAN**  
**REMEDIAL ACTION AT IR SITE 25**  
**FORMER NAS MOFFETT FIELD**  
**MOFFETT FIELD, CALIFORNIA**  
**MARCH 2011**

No.	Page	Section	Para-graph	Comment	Navy Response
					to revision 2 of the RD/RAWP. The plan outlines O&M activities. A note to this effect has been added to Section 3.4.
3	-	Appendix A	-	Clarify why a letter designating authority for Hunters Point Shipyard is included in this document.	Comment noted. A current letter of appointment will be included in the Draft Final RD/RAWP.
4	WS#2	Appendix B	-	Include EPA in the list of organizational partners.	Concur. Text edit in WS#2 will be made to reflect comment.
5	WS#3	Appendix B	-	Change the EPA contact to John Chestnutt.	Comment noted. It is our recent understanding that Ms. Melinda Dragone will be the new USEPA contact for IR Site 25. Text edit will be made to include Ms. Dragone in WS#3 in the Draft Final SAP.
6	WS#10	Appendix B	Step 1	Include testing for the site-specific chemicals of concern for import fill.	Concur. Although import fill is no longer proposed, on-site borrow sediment will be tested for the site-specific COECs. Text in Step 1 of WS#10 will be edited to reflect this.
7	WS#11	Appendix B	-	Include EPA in the list of regulatory agencies. EPA is the lead Federal regulatory agency and the Water Board is the lead State regulatory agency.	<p>Comment noted. It is assumed that the comment pertains to WS#2 and WS#10. The text in WS#2 will be edited to add USEPA in the list of regulatory agencies. "Lead agency" status will not be mentioned.</p> <p>In WS#10, the following text will be added to the paragraph addressing "planning team":</p> <p>For this project, the DQO planning team members include the Navy remedial project manager (RPM), contractor technical staff, and representatives of the lead Federal and State regulatory agency stakeholders (USEPA and Water Board, respectively). As lead agency, the Navy is the primary decision-maker with ultimate authority for making final decisions based on the recommendations of the planning team.</p>
8	WS#11	Appendix B	Step 2	Include the site-wide average remediation goals. The text states the purpose of the sampling is to "determine when a sufficient amount of contaminated sediment has been removed to achieve	Concur. Text edit will be made in WS#10 to reflect comment.

**NAVY RESPONSES TO COMMENTS (REVISED)**  
**DRAFT REMEDIAL DESIGN/REMEDIAL ACTION WORK PLAN**  
**REMEDIAL ACTION AT IR SITE 25**  
**FORMER NAS MOFFETT FIELD**  
**MOFFETT FIELD, CALIFORNIA**  
**MARCH 2011**

No.	Page	Section	Para-graph	Comment	Navy Response
				the do-not-exceed remediation goals.” The remedial action at the site must also meet the site-wide average remediation goals.	
9	WS#11	Appendix B	Step 3	Include in the text that import fill be analyzed for additional chemicals if warranted based on the fill source. Section 6.5.1 of the Work Plan states, “The analyte list for testing will include the COECs for IR Site 25, plus the list of analytes in the DTSC advisory.”	Comment noted. Because only on-site material from borrow areas at SWRP will be used for backfill/site restoration, the text will be revised to list the site-specific COECs as the analytes. The text in WS#11 will be edited to reflect this approach.
10	WS#11	Appendix B	Step 5	Fill material must meet both the do-not exceed and site-wide average remediation goals. As discussed in General Comment 2, above, use of Water Board ESLs for human health is not appropriate as a screening criterion for import fill at Site 25.	Concur. Borrow material will meet the do-not-exceed (upper bound) and will also be used in the calculation to attain the site-wide average (lower bound) remediation goals. The text in WS#11 will be edited to reflect this response.
11	-	Appendix B	-	Figures SP-7, SP-9, and SP-10, show the PG&E buried transmission gas line.	Concur. The figures will be edited to reflect the comment.
12	-	Appendix B	-	Attachment 5: See General Comment 2.	Concur. Please see response to General Comment 2. The attachment will be deleted.
<b><i>Comments from Eric Mruz, Refuge Manager, Don Edwards SF Bay NWR, (United States Fish and Wildlife), by e-mail dated 12 April 2011</i></b>					
1	-	-	-	When would your project start/stop: (we have duck hunting starting in mid Oct, I would not like to see any construction if possible during this time)	Comment noted. If surface water can be successfully removed, we anticipate that the project can be sequenced so that major excavation and T&D activities along the Levee Road (Bay Trail) will be completed by mid-October 2012. Removal of temporary dams may extend into November, but should take only 5 days or less.
2	-	-	-	Haul route: your map is not clear on which gates the trucks will be coming through and leaving.	Comment noted. Figure 6, Traffic Control and Bay Trail Closure Plan, has been revised to indicate active gates.
3	-	-	-	How many trucks per day?	Comment noted. The number of trucks moving locally (within the confines of IR Site 25) will depend on site-specific conditions including presence of surface water and waste characterization data that have yet to be gathered. The number of trucks slated for

**NAVY RESPONSES TO COMMENTS (REVISED)**  
**DRAFT REMEDIAL DESIGN/REMEDIAL ACTION WORK PLAN**  
**REMEDIAL ACTION AT IR SITE 25**  
**FORMER NAS MOFFETT FIELD**  
**MOFFETT FIELD, CALIFORNIA**  
**MARCH 2011**

No.	Page	Section	Para-graph	Comment	Navy Response
					waste off-haul, i.e., out of NASA ARC onto public thoroughfares to the waste facilities, is estimated to be 100-150 trucks per day. A smaller number of trucks will use the Bay Trail as a haul road, because the majority of project operations will be in the southern portion of IR Site 25.
4	-	-	-	If your work hours are M-F 7-4, will open the trail each night for the public?	Comment noted. The Bay Trail closures will only be on select work days, and during work hours only. A security service will be present during off-work hours to prevent vandalism and theft of pumping equipment.
5	-	-	-	Damage to levees: depending on how many trucks, these levees may need to be raised back to proper elevation and/or re-graveled once complete.	Comment noted. Damages to existing infrastructure will be repaired. Text has been added to Section 6.5.
6	-	-	-	Will you have flagman at each gate insuring the public does not access site?	Comment noted. The Navy will coordinate with the stakeholders regarding the most efficient and effect methods of closing the Bay Trail.
7	-	-	-	Public outreach: How will you inform the public that uses the trail (when) it will be closing?	Comment noted. The Navy will coordinate with the Bay Trail stakeholders, including the Association of Bay Area Governments (ABAG), Midpeninsula Regional Open Space District, and USFWS regarding public notification. The Navy will utilize the Restoration Advisory Board (RAB) meetings and postings at the Don Edwards Visitor Center and at IR Site 25 (3 weeks in advance) to advertise the trail closings. Additional text has been added to Section 5.2.
<b><i>Comments from Ana Ruiz, Planning Manager, Midpeninsula Regional Open Space District, dated 19 May 2011</i></b>					
1	18	4.5	-	<i>Permits and Notifications</i> - Please include the need to obtain a Permit to Enter from Midpeninsula Regional Open Space District to complete remediation activities on District land. Also, please provide sufficient prior notice of the Bay Trail closure, at least 3 weeks in advance of the closure, and provide this information to the USFWS, ABAG, and District, all of whom manage or	Comments noted. The Navy requests a copy of this permit to review and will coordinate with the District in the near future. The Navy will also provide 3-week prior notifications of Bay Trail closures, both to the trail management agencies and via on-site signage. The text in Section 5.2 of the RD/RAWP has been modified to reflect the comment.

**NAVY RESPONSES TO COMMENTS (REVISED)**  
**DRAFT REMEDIAL DESIGN/REMEDIAL ACTION WORK PLAN**  
**REMEDIAL ACTION AT IR SITE 25**  
**FORMER NAS MOFFETT FIELD**  
**MOFFETT FIELD, CALIFORNIA**  
**MARCH 2011**

No.	Page	Section	Para-graph	Comment	Navy Response
				monitor visitor activities along the affected trail corridor. Lastly, please also post notice of the trail closure on site, also at least 3 weeks in advance, to alert routine and frequent trail users.	
2	15	3.0	-	<i>Operations and Maintenance Requirements</i> - Please provide information on the extent of the ecological monitoring, including how often vegetation monitoring will occur. Plant status, health, and growth should be monitored at least every 3 months and observations should be documented in writing and via photographs. Please make sure to provide ecological monitoring status reports to USEPA, California Water Board, NASA Ames, and the District. Long-term ecological monitoring should evaluate general wetland health for a minimal period of 5 years. Copies of long-term reports should also be provided to USEPA, Water Board, NASA Ames, and the District.	Comment noted. New Appendix H, Salt Marsh Habitat Restoration Plan, presents the planned O&M program. The text (Section 3.4) has been revised to reference the plan.
3	16	4.0	-	<i>Preconstruction Biological Surveys</i> - Please make available the biological avoidance procedures that USFWS will provide. Also, please refer to the attached list of plant and wildlife sightings for Stevens Creek Shoreline Nature Study Area to identify any other sensitive species that should be taken into consideration. This list was derived from the Natural Resources Database that is available online.	Comments noted. No comments from USFWS regarding biological avoidance were received by the comment period deadline, which was specifically extended for them.
4	18	4.4	-	<i>Preconstruction Photo Survey</i> – Please also coordinate with the District to conduct photo surveys on District lands.	Concur. The text has been modified to reflect comment.
5	22-23	5.7	-	<i>Biological Avoidance and Mitigation Measures</i> – Please confirm whether the Navy will replace any active burrowing owl burrows that are removed as a result of the remediation work. If burrows will not be replaced, please explain how the Navy will avoid impacts to burrowing owls and the number of existing burrows that are currently active.	Comments noted. The Navy has conducted several biological surveys of IR Site 25 over the last 6 to 9 months and has not noticed any indications of the presence of burrowing owls. Should burrowing owls or active burrows be encountered during site work, the on-site biologist will shut down operations to assess the situation in consultation with the NASA ARC biologist and stakeholders. Text has been expanded to address this comment.

**NAVY RESPONSES TO COMMENTS (REVISED)**  
**DRAFT REMEDIAL DESIGN/REMEDIAL ACTION WORK PLAN**  
**REMEDIAL ACTION AT IR SITE 25**  
**FORMER NAS MOFFETT FIELD**  
**MOFFETT FIELD, CALIFORNIA**  
**MARCH 2011**

No.	Page	Section	Para-graph	Comment	Navy Response
6	25	6.4	-	<i>Excavation of Contaminated Sediment</i> - Please clarify whether excavation will occur at 6-inch intervals up to a depth of 2 feet or up to a depth of 1 foot to arrive at chemical concentration levels that are below threshold before excavation work is halted and the Navy is consulted. This chapter states up to 1 foot, elsewhere it references 2 feet, and the Appendix references up to 18 inches.	Comment noted. Figure 3 of Appendix D indicates the planned depths of excavation and incorporates recent pre-design chemistry results from the fall 2010 sampling event. As indicated, the vast majority of excavations are planned to be 0.5 feet; several at 1 foot; and a few at 1.5 feet. A reference to this figure has been added to Section 6.4, and has been added to Section 6.4.3 to describe the approach to possible overexcavation in 0.5-ft increments based on results of confirmation sampling.
<i>Comments from Allen Tsao, Associate Toxicologist, and Tami Nakahara, Environmental Scientist, California Department of Fish and Game, undated</i>					
<i>General Comments from Allen Tsao and Tami Nakahara, CDFG</i>					
1	-	-	-	DFG-OSPR concurs with and supports comments from US EPA (Kloss, 2011) and the San Francisco Water Board (Wells, 2011) on the subject document.	Comment noted.
2	-	-	-	It is DFG-OSPR's understanding that NASA currently plans to conduct remedial action on their contaminated AOI-14 (the two unnamed peninsulas into Site 25 as shown in Figure 6 of the document) following the Navy's remedial action for Site 25. Therefore, DFG OSPR recommends that the Navy and NASA reach a consensus on how to segregate responsibility by agency for the existing contamination prior to the start of Navy's remedial action. We are concerned that contaminants from NASA's two peninsulas may migrate into Site 25 after the subject remedial action. It is also conceivable that NASA may claim physical disturbance caused by the Navy's remedial action resulted in transport of NASA's contaminated material from the two peninsulas into Site 25. The lack of coordinated planning and remedial actions may cause additional impacts to natural resources by a delay in cleanup on the adjacent peninsulas, potential re-contamination of Site 25, and repeated disturbance from multiple actions. In addition, earlier consensus between both parties would help avoid potential dispute in the future regarding NASA's responsibility for cleanup at the two	Comment noted. The Navy is coordinating with NASA regarding Navy cleanup activities to reach a mutual understanding of responsibilities regarding peninsula contamination along the boundaries of IR Site 25. The Navy has expressed concerns similar to CDFG; however, USEPA has expressed a desire that the Navy cleanup go forward and has also indicated that any potential recontamination of IR Site 25 would be NASA's responsibility.

**NAVY RESPONSES TO COMMENTS (REVISED)**  
**DRAFT REMEDIAL DESIGN/REMEDIAL ACTION WORK PLAN**  
**REMEDIAL ACTION AT IR SITE 25**  
**FORMER NAS MOFFETT FIELD**  
**MOFFETT FIELD, CALIFORNIA**  
**MARCH 2011**

No.	Page	Section	Para-graph	Comment	Navy Response
				peninsulas.	
3	-	-	-	Please clarify that reference to remediation goals (sometimes termed site-specific action level, site-specific remediation goal, or remediation goal) specifically relate to the do-not-exceed remediation goals and the site-wide average remediation goals. In addition, the method detection limit, project quantitative limit goal, and project action limit must meet both the do-not-exceed remediation goal and the site-wide remediation goal. Please refer to Specific Comments 11 and 12 for more detail.	<p>Comment noted. The proper administrative name for the site-specific cleanup goals as stipulated in Table 10 of the IR Site 25 Record of Decision for this project is <i>Remediation Goals (RGs)</i>, which is consistently used in the RD/RAWP. The phrase “site-specific” is sometimes used to clarify what cleanup goals are being referred to. The phrase “action levels” is sometimes used to correlate the RGs with specific operational decisions or strategies, including analytical requirements during chemical testing.</p> <p>Regarding MDLs, PQLs, and PALs, the Navy concurs and we will meet both the do-not-exceed RGs and the site-wide average RGs. WS#15 in the SAP will be edited with laboratory-specific MDLs that are below the site-wide average (lower bound) RGs.</p> <p>To verify that the lower bound RGs are attained, the Navy will redo the calculation of the site-wide average concentration for each COEC as part of the Remedial Action Completion Report (RACR). Text has been added to Section 9.0 of the RD/RAWP. The excel file used in this calculation will be made available at the time of submitting the Draft RACR. Note #3 at the bottom of SAP WS#15 will be edited to refer to the site-wide average RGs.</p> <p>Regarding analyzing for other compounds under EPA method 8081 as requested during our 6/22/11 team conference call, the Navy will only be analyzing samples for the COECs per the ROD. Since 1993, hundreds of samples have been collected at IR Site 25 including the full list of pesticides/PCBs, polycyclic aromatic hydrocarbons (PAHs), semivolatile organic compounds (SVOCs), metals, and volatile organic compounds (VOCs). Only total PCBs, DDT, lead and zinc have shown to be an ecological</p>

**NAVY RESPONSES TO COMMENTS (REVISED)**  
**DRAFT REMEDIAL DESIGN/REMEDIAL ACTION WORK PLAN**  
**REMEDIAL ACTION AT IR SITE 25**  
**FORMER NAS MOFFETT FIELD**  
**MOFFETT FIELD, CALIFORNIA**  
**MARCH 2011**

No.	Page	Section	Para-graph	Comment	Navy Response
					risk under the tidal marsh scenario.
4	-	-	-	DFG-OSPR requests that the Navy provide a section describing the proposed ecological restoration plan. This section should describe what areas will be backfilled, the locations and types of native plants to be planted, and criteria for evaluating whether the revegetation was successful.	Comment noted. The Navy will coordinate with NASA ARC and MROSD to ascertain plans for the future reuse of IR Site 25. The Navy has developed a <i>Salt Marsh Habitat Restoration Plan</i> (Appendix H). Text has been added to Section 3.4 to identify this appendix.
5	!	!	!	The site-wide average remediation goal is based on the use of Thiessen polygons. In this process, a polygon is drawn around each sampling location through the midpoint between each adjacent sampling location. The concentration of the single sampling location is assumed to be representative of the polygon as a whole when calculating area-weighted average concentrations. This assumption may be reasonable when the distance between sampling locations is relatively small, such as 50 ft. However, when sampling locations are spaced several hundred feet apart, the uncertainty in this assumption increases significantly. The uncertainties associated with the Thiessen polygon model (Woodbury, 2003) could be reduced after the proposed remedial action occurs by increasing the number of confirmation samples. Specifically, DFG-OSPR requests that additional confirmation sampling locations be placed every 150 ft between each sample locations that are greater than 300 ft apart to validate and confirm that the overall remedial action has met the do-not exceed and site-wide average remediation goals.	Comment noted. The Navy concurs with additional confirmation sampling. Please see response to USEPA specific comment no. 6 above for edits to SAP WS#18 and SAP figures that reflect additional confirmation samples at large polygons.
<i>Specific Comments from Allen Tsao and Tami Nakahara, CDFG</i>					
1	12	3.1.2	-	Requirement for the RA  a. Section 3.1.2 states, “for areas regarded by the project botanist as requiring backfilling, these pH and TOC [total organic carbon] data will be used to select a source of imported fill to match	Comments noted. No material will be imported. The following text has been added to Section 6.5.1, <i>General Fill Material</i> .  For areas that need to be backfilled, material from the SWRP will be used as fill. Using on-site material from dewatered areas is desirable in that: (1) there will be fewer truck trips and reduced

**NAVY RESPONSES TO COMMENTS (REVISED)**  
**DRAFT REMEDIAL DESIGN/REMEDIAL ACTION WORK PLAN**  
**REMEDIAL ACTION AT IR SITE 25**  
**FORMER NAS MOFFETT FIELD**  
**MOFFETT FIELD, CALIFORNIA**  
**MARCH 2011**

No.	Page	Section	Para-graph	Comment	Navy Response
				<p>characteristics of the removed sediment.”</p> <p>(1) In addition to pH and TOC, please add “grain size” as a selection criterion for the imported fill.</p> <p>(2) Please identify the specific numerical criteria (and the source of those numbers) for pH, TOC, and grain size that will be used to evaluate the imported fill.</p> <p>(3) The current proposal is to remove material from another area of Site 25 (the “proposed borrow pit”) and use it to fill excavated areas within the remedial action footprint. Please describe the re-grading plans for the borrow pit area and include them in the restoration plan, and ensure they are consistent with Appendix E, Biological Assessment.</p> <p>(4) As quoted above, Section 3.1.2 states that a project botanist will determine which areas will be required for backfill; however, Appendix A, Section 4.7, indicates that the quality control engineer will direct which excavation area may be backfilled. Please rectify this discrepancy. As we suggested in General Comment above, an ecological restoration plan would be the most appropriate place that provide a decision process on what excavated areas will be backfilled.</p>	<p>impacts to NASA ARC operations and infrastructure, in contrast to bringing in import from off-site sources; and (2) observations at the site indicate that sensitive habitat flora such as pickleweed flourish in the sediment, suggesting that on-site material will provide conditions conducive to rapid revegetation of marsh species.</p> <p>The Navy will compare agronomic parameters (including grain size) between borrow area sediment (after verification that the sediment passes COEC lower-bound RG criteria) and sediment supporting pickleweed (in uncontaminated areas of IR Site 25), as described in Appendix H, the <i>Salt Marsh Habitat Restoration Plan</i>.</p> <p>After all borrow material is removed at each respective borrow area, grading will be conducted to smooth off the edges of the remaining depression (24-inches-deep or less). NASA has concurred with this approach since this also provides them additional storm water capacity within IR Site 25.</p> <p>Regarding (a)(4), the QC engineer is responsible in the field and has a role in the chain of command for implementing the project and ascertaining that work meets applicable specifications and requirements. In this case, he will use the restoration plan (Appendix H in Revision 2: Draft RD/RAWP) as the requirement for directing the work in the operational sense and to verify that the work meets the objectives outlined in the restoration plan.</p>
2	13	3.1.4	-	<p><i>Treatability Analysis and Leachability Test</i> - The text states, “Additional leachability tests for the COECs [chemicals of ecological concern] at the site will be considered during the upcoming selection of waste disposal facilities to be used during the RA.” If the additional leachability tests indicate sediment exhibits characteristics of hazardous waste, will the stabilization treatment be conducted on-site? If so, please describe where the</p>	<p>Comment noted. Waste characterization, profiling, and selection of waste facilities are now planned for Feb-April 2012. Leaching tests will be conducted if warranted, e.g., high lead detections in sediment samples, per Title 22 of the California Code of Regulations. Should testing and market considerations warrant on-site treatment, the Navy will develop a location to conduct the operation, based on volume and specific conditions. At this time,</p>

**NAVY RESPONSES TO COMMENTS (REVISED)**  
**DRAFT REMEDIAL DESIGN/REMEDIAL ACTION WORK PLAN**  
**REMEDIAL ACTION AT IR SITE 25**  
**FORMER NAS MOFFETT FIELD**  
**MOFFETT FIELD, CALIFORNIA**  
**MARCH 2011**

No.	Page	Section	Para-graph	Comment	Navy Response
				stabilization area will be and how to ensure that all the stockpiled soil/sediment is removed.	based on previous leachability test results of high-lead soil samples (that yielded v. low dissolved lead), no on-site soil treatment is planned.
3	16	4.1		<p><i>Pre-Construction Biological Surveys</i></p> <p>a. The Navy states, “The Navy will work with USFWS” (United States Fish and Wildlife Service) “to ensure that endangered and listed species at IR Site 25 suffer no short-term impacts during RA activities.” Since there are also State special status species present at IR Site 25, please include in the text that the Navy will also work with DFG-OSPR to ensure State special status species are not impacted during RA activities.</p> <p>b. The Navy states, “Pre-design biological site reconnaissance was conducted over the wet and dry months of 2010. No special status species were encountered or observed during the reconnaissance (KCH, 2011).” According to Appendix A (Vegetation Types and Wildlife Observed at IR Site 25) of the cited report (KCH, 2011), wildlife observed at IR Site 25 include: two State Fully Protected Species (the American Peregrine Falcon and the White-tailed Kite); and four State Species of Special Concern (the Northern Harrier, American White Pelican, Loggerhead Shrike, and Song Sparrow). Therefore, the text should be revised to state, “Special status species were encountered or observed during site reconnaissance.”</p> <p>c. The Navy states, “It is anticipated that USFWS will comment on the BA [Biological Assessment] and provide guidance for procedures for biological avoidance and mitigation during the project.” Since some of the special status species identified in the BA as potentially being impacted by the proposed remedial actions are also State special-status species (i.e., salt marsh harvest mouse [SMHM], California Clapper Rail, California Black Rail, California Least Tern, Western Snowy Plover,</p>	Concur. The text has been modified to reflect comments 3(a) through 3(d).

**NAVY RESPONSES TO COMMENTS (REVISED)**  
**DRAFT REMEDIAL DESIGN/REMEDIAL ACTION WORK PLAN**  
**REMEDIAL ACTION AT IR SITE 25**  
**FORMER NAS MOFFETT FIELD**  
**MOFFETT FIELD, CALIFORNIA**  
**MARCH 2011**

No.	Page	Section	Para-graph	Comment	Navy Response
				<p>California seabird), the text should be revised to state, "The BA will be provided to USFWS and DFG-OSPR for review, comment, and guidance on measures to avoid, minimize, and mitigate impacts to special status species during the project."</p> <p>d. The Navy states, "An endangered species survey is being conducted during winter-spring 2011 ahead of the planned invasive RA activities, to assess whether it will be necessary to establish buffer zones around the excavation areas to provide protection for federally protected species." Since State protected species may also be present on site, the text should be revised to state, "...establish buffer zones around the excavation areas to provide protection for Federally and State protected species."</p>	
4	19	4.5	-	<p><i>Permits and Notifications</i> - The Navy lists three permits that are anticipated for the project: a NASA construction permit, a NASA Ames Research Center (ARC) hot work permit, and a NASA ARC permit for two-way radios. Although the Navy is not required to obtain ARAR-related permits through CERCLA, the substantive requirements of the permits should be met. Since there is the potential for remedial activities to impact wetlands, Federal and State jurisdictional waters, and special-status species (i.e., SMHM, California Clapper Rail, California Least Tern, Western Snowy Plover, etc.), the Navy should consult with appropriate agencies (i.e., Army Corps of Engineers, USFWS, National Oceanic and Atmospheric Administration National Marine Fisheries Service, and DFG-OSPR) regarding their substantive requirements for this project. These substantive requirements should be identified in this section along with the other three permits.</p>	<p>Comment noted. The intent of the project is to restore wetlands. The Navy is committed to comply with requirements of all jurisdictions, as documented in the applicable and relevant or appropriate requirements (ARARs) listed in the Final Record of Decision. A statement has been added to this section to refer the reader to the ARARs.</p>
5	22-23	5.7	-	<p>Biological Avoidance and Minimization Measures</p> <p>a. This section should be moved from Section 5.0 Site Management to Section 8.0 Environmental Protection Plan.</p> <p>b. The Navy states, "If WPTs [Western pond Turtles] are observed, the biologist will relocate them to an appropriate site at</p>	<p>Comments noted.</p> <p>Regarding (a), the Navy concurs. This text has been repositioned as Section 8.4.</p>

**NAVY RESPONSES TO COMMENTS (REVISED)**  
**DRAFT REMEDIAL DESIGN/REMEDIAL ACTION WORK PLAN**  
**REMEDIAL ACTION AT IR SITE 25**  
**FORMER NAS MOFFETT FIELD**  
**MOFFETT FIELD, CALIFORNIA**  
**MARCH 2011**

No.	Page	Section	Para- graph	Comment	Navy Response
				<p>NASA ARC as identified by the NASA ARC biologist.” Due to the potential for WPTs to be present at the EDM and the difficulty in observing and catching by hand or net all WPTs that may be present in the EDM, DFG-OSPR recommends that WPTs be trapped for a period of 3 weeks prior to the start of remedial activities. The Navy should coordinate with DFG-OSPR during this time period in the event a large number of WPTs are being trapped. This would indicate there is a large population of WPTs present in the EDM and trapping may need to continue beyond the 3-week period or the Navy may need to implement other avoidance and minimization measures to prevent impacts to WPTs. In addition to trapping, the Navy may try to disturb the work area prior to the start remedial activities to try and drive the turtles from the area. This measure would need to be coordinated with DFG-OSPR to ensure no take occurred during the action. The Navy should follow the trapping methods outlined in the WPT Habitat Management Plan (HMP) (Attachment 2, RAWP [TtEC 2006a]). DFG-OSPR recommends the following avoidance, minimization, and mitigation measures be implemented in addition to or in place of corresponding measures listed in the WPT HMP (Attachment 2, RAWP [TtEC 2006a]) for protection of the turtles at Site 25:</p> <p>(1) Site activities should be conducted outside of WPT breeding and nesting season (April through August, as stated in WPT HMP) to the greatest extent possible.</p> <p>(2) Exclusionary fencing for the WPT should be installed around the work site, staging, and laydown areas as soon as possible to prevent WPT from entering the work site and nesting. The exclusionary fencing shall be erected immediately after driving the turtles from the work site and prior to trapping and relocating any turtles present within the work site. The exclusionary fencing should consist of 2-3 foot high particle board, metal flashing, or silt fence buried 6 inches below ground to reduce the potential for</p>	<p>Regarding (b)(1) through (b)(7), and (b)(9) through (b)(11), the Navy is aware that no WPTs have been observed in the areas to be excavated (in 1998 one WPT was sighted at the settling basin), and the conditions at IR Site 25 are regarded as marginal WPT habitat, at best. NASA conducted bio surveys of the EDM around 2003. No turtles were observed in this survey. No WPTs have been observed in any recent surveys conducted by the Navy.</p> <p>The EDM has no hydrological connection to the Stevens Creek system or NASA's east side stormwater drainage ditches, where turtles are known to be. The EDM does not have very good habitat (deep water) for WPTs.</p> <p>The Navy will install silt fences along temporary access roads for the purpose of excluding wildlife (please see Section 8.4).</p> <p>The comment and subsequent email on 23 June 2011 on WPT trapping is noted. Upon a recent site visit and further discussions with the team biologists and the NASA wildlife biologist, WPT trapping does not appear to be warranted or feasible at this time. The EDM is a thicket of cattails, both standing and decaying on the ground. The water depths at the EDM are typically limited (i.e., less than 6 inches as of late June 2011 and now dry in most places). The dense vegetation and the lack of water at the EDM prevent the deployment of the two standard devices used to trap WPT (i.e., hoop traps and basking traps).</p> <p>In preparing for the RA site work, the biologist will include WPT in the resource education program to be given to each site worker.</p> <p>During the RA, the biologist(s) will inspect the area around each piece of heavy equipment and truck prior to it being moved and will inspect each site planned for excavation prior to daily activities. Also, active excavation operations will be continuously</p>

**NAVY RESPONSES TO COMMENTS (REVISED)**  
**DRAFT REMEDIAL DESIGN/REMEDIAL ACTION WORK PLAN**  
**REMEDIAL ACTION AT IR SITE 25**  
**FORMER NAS MOFFETT FIELD**  
**MOFFETT FIELD, CALIFORNIA**  
**MARCH 2011**

No.	Page	Section	Para-graph	Comment	Navy Response
				<p>turtles to dig under the fence and enter the work site.</p> <p>(3) WPT within the entire work site, including staging and laydown areas, shall be trapped and relocated to a temporary holding site approved by DFG before site activities begin (such as staging and storage of equipment and vegetation removal). A qualified biologist with experience working with WPTs and approved by DFG would determine the temporary holding site, in consultation with DFG. A map should be provided to DFG showing the location of the temporary holding site. It is highly recommended that the temporary holding site is hydrologically connected to the site from which the turtles are being removed. The temporary holding site should provide an inundated area with both shallow and deep water, hiding and basking sites, and suitable upland habitat protected from predators for gravid turtles if relocation is conducted during breeding/nesting season. The temporary holding site should also be thoroughly analyzed by the qualified biologist to ensure that the new site could support the additional turtles, there is an adequate food supply for the duration of the relocation, and there are no pathogens, predators, or invasive species such as quagga mussels, etc. that may impact the turtles or the restored site. The turtles should be kept in the temporary holding site for the least amount of time necessary. If the turtles need to be kept in the temporary holding site past October 2011, DFG should be consulted.</p> <p>The temporary holding site shall be isolated and monitored during work activities according to the WPT HMP (Attachment 2, RAWP [TiEC 2006a]). The chain link or post and beam fence around the temporary holding site should be lined with particle board, metal flashing, or silt fence that is buried 6 inches underground to reduce the potential for turtles to climb or dig out of the enclosure.</p> <p>(4) Turtles shall be trapped by a qualified biologist. The</p>	<p>observed by the biologist (or multiple biologists if work is progressing in multiple areas) who will have authority to shut down the activity should a WPT or other listed species becomes present.</p> <p>The comment and subsequent e-mail on 23 June 2011 on silt fences is noted. Silt fences will be installed along access roads (adjacent to vegetation/pickleweed) leading to excavations, to prevent wildlife interference with vehicles and equipment. A biologist (or multiple biologists if work is progressing in multiple areas) will observe vehicles as they move through the access roads. The Navy is committed to preservation of all species including the WPT and will take appropriate measures to mitigate any possible negative impacts. The Navy encourages CDFG staff and all team members and stakeholders to attend a site visit to assess conditions first-hand.</p>

**NAVY RESPONSES TO COMMENTS (REVISED)**  
**DRAFT REMEDIAL DESIGN/REMEDIAL ACTION WORK PLAN**  
**REMEDIAL ACTION AT IR SITE 25**  
**FORMER NAS MOFFETT FIELD**  
**MOFFETT FIELD, CALIFORNIA**  
**MARCH 2011**

No.	Page	Section	Para-graph	Comment	Navy Response
				<p>qualified biologist should capture WPT using hoop traps baited with fresh or frozen fish (i.e., sardines, squid). Traps should be checked once a day and fitted with fresh bait. An air space in the traps shall be provided so the turtles can breathe. At least 1 trap every 150 feet should be set within the EDM where turtles are most likely to be found. Trapping should begin at least three weeks before site activities start and continue until site activities begin.</p> <p>At the time of capture of the WPTs, the plastron can be marked with a non-toxic marker or paint pen for identification purposes. DFG recommends that the biologist photo document the turtles captured (i.e., views of the carapace and the plastron), in addition to recording sex, weight and other basic measurements as stated in the WPT HMP (Attachment 2, RAWP [TtEC 2006a]). Female WPT should be palpated to see if they are gravid. California Natural Diversity Database data sheets should be submitted to DFG to document the locations of the captured WPT.</p> <p>While processing WPT (or empty traps), please include the following information on the WPT survey/trapping forms:</p> <ul style="list-style-type: none"> <li>(a) Site</li> <li>(b) Location (GPS)</li> <li>(c) Date</li> <li>(d) Recorder &amp; observers</li> <li>(e) # Traps used/type</li> <li>(f) Total # turtles captured</li> <li>(g) Date/time traps set</li> <li>(h) Date/time traps checked</li> </ul>	

**NAVY RESPONSES TO COMMENTS (REVISED)**  
**DRAFT REMEDIAL DESIGN/REMEDIAL ACTION WORK PLAN**  
**REMEDIAL ACTION AT IR SITE 25**  
**FORMER NAS MOFFETT FIELD**  
**MOFFETT FIELD, CALIFORNIA**  
**MARCH 2011**

No.	Page	Section	Para-graph	Comment	Navy Response
				<ul style="list-style-type: none"> <li>(i) Trap Day #</li> <li>(j) Visual survey - # turtles observed</li> <li>(k) Conditions: <ul style="list-style-type: none"> <li>• Starting air temperature 2cm above water level</li> <li>• Stop air temperature 2cm above water level</li> <li>• Starting water temperature 2cm below water surface in water &gt;20cm deep</li> <li>• Stop water temperature 2cm below water surface in water &gt;20cm deep</li> <li>• % Cloud Cover/weather</li> </ul> </li> <li>(l) Basic Measurements: <ul style="list-style-type: none"> <li>• Turtle ID #</li> <li>• Weight (grams)</li> <li>• Sex/status (M, F [gravid], unknown)</li> <li>• Age/class</li> <li>• CL (carapace length max, mm)</li> <li>• CW (carapace width max, mm)</li> <li>• HS (height of shell max, mm)</li> <li>• PL (plastron length max, mm)</li> <li>• MPL (median PL, down center, mm)</li> <li>• Photo #s</li> <li>• Notes (any injuries, previous markings, etc.)</li> </ul> </li> </ul>	

**NAVY RESPONSES TO COMMENTS (REVISED)**  
**DRAFT REMEDIAL DESIGN/REMEDIAL ACTION WORK PLAN**  
**REMEDIAL ACTION AT IR SITE 25**  
**FORMER NAS MOFFETT FIELD**  
**MOFFETT FIELD, CALIFORNIA**  
**MARCH 2011**

No.	Page	Section	Para-graph	Comment	Navy Response
				<p>Please submit copies of the survey/trapping forms with weekly reports, at the end of each work week, summarizing trapping and visual surveys results, and construction monitoring to DFG-OSPR.</p> <p>Non-native species incidentally captured in WPT traps (i.e., bullfrogs, red-eared sliders, etc.) shall not be released back into the wild.</p> <p>(5) After trapping is completed, the mud in the bed of the EDM where remedial activities will occur should be physically checked for buried turtles by the qualified biologist walking through and examining the mud to a depth of at least 6-8 inches. Any turtles encountered should be processed and relocated out of the construction area into the approved temporary holding site. Undercut areas along the banks as well as dense cattail stands should be thoroughly searched for buried WPTs.</p> <p>(6) Upland areas should be thoroughly searched by the qualified biologist for WPT nests and aestivating turtles. If aestivating turtles or eggs are found in nest sites, work shall stop and shall not start again until the qualified biologist has consulted DFG-OSPR on how to avoid impacts to the WPTs or eggs. Aestivating turtles and nest sites should not be disturbed without prior approval from DFG-OSPR. Eggs shall not be removed from the nest site and captive incubated.</p> <p>(7) A qualified biologist familiar with the life histories of special-status species that may potentially be in or near the work area is required to be on-site during all work activities to monitor for the presence of WPTs or other sensitive species. If active turtles are encountered during site work, work shall halt immediately until the qualified biologist can transport the turtles to the approved temporary holding site.</p>	

**NAVY RESPONSES TO COMMENTS (REVISED)**  
**DRAFT REMEDIAL DESIGN/REMEDIAL ACTION WORK PLAN**  
**REMEDIAL ACTION AT IR SITE 25**  
**FORMER NAS MOFFETT FIELD**  
**MOFFETT FIELD, CALIFORNIA**  
**MARCH 2011**

No.	Page	Section	Para-graph	Comment	Navy Response
				<p>(8) The Navy shall restore the remediation site to promote WPT habitat. Please follow the general guidelines in the Biological Mitigation and Restoration Measures Plan (TtEC, 2006b), and the Western Pond Turtle Habitat Management Plan (Attachment 2, RAWP [TtEC 2006a]). Please note that native California plant species appropriate for the habitat being restored and from the same watershed where the restoration is occurring should be used. Restoration of WPT habitat should include elements such as refugia for turtles to hide from predators and basking structures. Basking structures should be located in open water areas. Please include a site-specific restoration plan in the IR Site 25 RD/RAWP for review.</p> <p>(9) Upon completion of site restoration, release temporarily relocated WPTs back to original location at EDM. If WPTs are temporarily relocated to a site that is hydrologically connected to the area from which the turtles are being removed, the turtles can be allowed to self-relocate. The WPT fence enclosure around the temporary relocation site can be lifted to allow the turtles to self relocate as long as there are no potential hazards (i.e, roads) that may impact WPTs during self relocation. If WPTs are temporarily relocated to a pond on the golf course, the WPTs are not allowed to self-relocate. The WPTs at this relocation site must be captured and relocated back to their original location at EDM.</p> <p>(10). Please conduct visual surveys according to the following methodology:</p> <p>Ideally, visual surveys are conducted during the time of year and time of day when turtles are expected to be aerially basking. Visual surveys should also be conducted each day prior to conducting capture surveys. Visually search the water and shoreline for a minimum of 15 to 30</p>	<p>Regarding (b)(8), comment noted. Native California plant species appropriate for the habitat being restored and from the same watershed where the restoration is occurring will be used to the greatest extent possible. The Navy has developed a salt marsh habitat restoration plan (Appendix H to Revision 2: Draft RD/RAWP).</p>

**NAVY RESPONSES TO COMMENTS (REVISED)**  
**DRAFT REMEDIAL DESIGN/REMEDIAL ACTION WORK PLAN**  
**REMEDIAL ACTION AT IR SITE 25**  
**FORMER NAS MOFFETT FIELD**  
**MOFFETT FIELD, CALIFORNIA**  
**MARCH 2011**

No.	Page	Section	Para-graph	Comment	Navy Response
				<p>minutes using binoculars or a spotting scope. Results of these visual surveys are noted on the WPT survey/trapping forms. Please note that melanistic red-eared sliders may resemble WPTs during visual surveys. Record only confirmed sightings of WPTs on the survey forms.</p> <p>(11). At the end of each trapping session, or when moving to another body of water, all equipment shall be disinfected to prevent the spread of disease. Methods described by the Declining Amphibian Task Force Fieldwork Code of Practice shall be used to disinfect all equipment and gear  <a href="http://www.fws.gov/ventura/speciesinfo/protocols_guidelines/docs/DAFTA.pdf">http://www.fws.gov/ventura/speciesinfo/protocols_guidelines/docs/DAFTA.pdf</a></p> <p>c. The Navy states, “If any active burrowing owl burrows are detected, the NASA ARC biologist will be consulted to determine the appropriate method of avoiding or mitigating impacts.” Please add to the text that DFG-OSPR will also be consulted to determine appropriate avoidance, minimization, and mitigation measures.</p> <p>d. Please include the following avoidance and minimization measures in the text:</p> <p>(1) During the nesting season (February 1 - September 15), a focused survey for nesting birds shall be conducted by a qualified biologist for all staging and storage areas, transportation routes, work areas, soil stockpile areas, and borrow areas within 14 days prior to commencement of any project activities. If work is stopped for more than 14 days during the nesting season, staging and storage areas, work areas, and soil stockpile areas shall be resurveyed before returning to work activities. The qualified biologist must survey the work area and all natural habitats occurring within 500 feet of the work area to identify active nests. If no active</p>	<p>Regarding (c), the comment is noted. The text (now Section 8.4) has been modified to add the following: “Should burrowing owls or active burrows be encountered during site work, the on-site biologist will shut down operations to assess the situation in consultation with the NASA ARC biologist, to determine the appropriate method of avoiding or mitigating impacts, and appropriate federal and state agencies will be notified for further coordination.”</p> <p>Regarding (d)(1), the Navy concurs. The text has been modified to reflect comment. (NOTE: Based on earlier comment, section 5.7 has been repositioned as Section 8.4.)</p>

**NAVY RESPONSES TO COMMENTS (REVISED)**  
**DRAFT REMEDIAL DESIGN/REMEDIAL ACTION WORK PLAN**  
**REMEDIAL ACTION AT IR SITE 25**  
**FORMER NAS MOFFETT FIELD**  
**MOFFETT FIELD, CALIFORNIA**  
**MARCH 2011**

No.	Page	Section	Para-graph	Comment	Navy Response
				<p> nests are found, no further mitigation is required.</p> <p>(2). If nesting birds are found during focused surveys, DFG and USFWS shall be notified, the locations shall be identified on a map, and no project activity shall occur within 700 feet for listed species (per the IR Site 25 BA), 250 feet for raptors, and 100 feet for other non-listed birds of an identified active nest until the young have fledged (as determined by a qualified biologist) or until the project proponent receives authorization from DFG and USFWS to proceed. If a qualified biologist and DFG determine the project activity would not be likely to adversely affect the nest, DFG may authorize the project proponent to proceed. The qualified biologist shall remain on site to monitor the activity of the nesting birds (including rails) during work activities. If the birds behave normally, the biologist shall monitor them twice per week to ensure the status has not change. If the birds change their behavior as a result of work activities, the biologist shall continue to monitor the birds as work is moved a greater distance from the nest until the birds act normally. The biologist shall then monitor the birds twice per week to ensure the status has not changed. Through consultation with DFG and USFWS measures will be developed to minimize impacts to birds. Vegetation containing nests that must be removed as a result of project implementation shall be removed during the non-nesting season (September - January).</p> <p>(3) Prior to the initiation of work each day, the qualified biologist shall thoroughly inspect the work area and adjacent habitat areas to determine if SMHM, California Clapper Rails, California Black Rails, or other special-status species are present in these areas. The qualified biologist shall remain on-site throughout these days while work activities are</p>	<p>Regarding (d)(2), the text has been modified to reflect the following: DFG and USFWS will be notified if nesting birds are found and work in the vicinity of nesting birds will be at the discretion of the on-site biologist and based on the recommended buffer zones. Work activities will be allowed as long as there are no resulting impacts to the normal behavior of nesting birds.</p> <p>Regarding (d)(3) through (d)(6), the Navy concurs. The text has been modified to reflect the comments.</p>

**NAVY RESPONSES TO COMMENTS (REVISED)**  
**DRAFT REMEDIAL DESIGN/REMEDIAL ACTION WORK PLAN**  
**REMEDIAL ACTION AT IR SITE 25**  
**FORMER NAS MOFFETT FIELD**  
**MOFFETT FIELD, CALIFORNIA**  
**MARCH 2011**

No.	Page	Section	Para-graph	Comment	Navy Response
				<p>occurring.</p> <p>(4) Equipment and vehicles shall be confined to the access routes, designated staging areas, and designated excavation areas.</p> <p>(5) The equipment decontamination area shall be located in the designated upland staging area away from wetland habitat.</p> <p>(6) Upland routes covered with pavement, bare ground, or non-native vegetation shall be utilized as access routes to the designated staging areas and excavation areas, to the greatest extent possible.</p>	
6	26	6.5	-	<p><i>Site Restoration</i></p> <p>a. The Navy states, “The botanist will recommend what areas require placement of imported fill to attain a restored condition.” Please note in the text that the imported fill will need to be graded to match the existing grade, in order to maintain the pre-excavation hydrologic conditions.</p> <p>b. The Navy states, “Where appropriate, disturbed areas will be revegetated with the dominant native plant species observed prior to excavation.” Please note in the text that plant stock from within the same watershed where the restoration occurs will be used when feasible. Use of local species will preserve the local genetic stock and prevent hybridization of local plant populations with distant populations that may not be as well adapted to local environmental conditions.</p>	Concur. The text has been modified to reflect the comments.
7	30	7.3	-	<p><i>Vegetative Matter</i></p> <p>a. Please clarify the proposed location of the laydown area for the grub material (i.e., vegetative matter and associated sediment material), and how long the grub material will remain in the area before being disposed of off-site.</p> <p>b. Please ensure all stockpiled grub material is disposed of off-site</p>	Comments noted. Laydown of vegetative matter will be within the confines of IR Site 25 and will depend upon conditions at the time of clearing. A desirable location for the vegetative waste from the EDM would be the clear area east of the SWSB (adjacent to the ITSI field trailer shown on Work Plan Figure 3. Specific locations of laydown areas will be presented to stakeholders at the planned teleconferences that will update

**NAVY RESPONSES TO COMMENTS (REVISED)**  
**DRAFT REMEDIAL DESIGN/REMEDIAL ACTION WORK PLAN**  
**REMEDIAL ACTION AT IR SITE 25**  
**FORMER NAS MOFFETT FIELD**  
**MOFFETT FIELD, CALIFORNIA**  
**MARCH 2011**

No.	Page	Section	Para-graph	Comment	Navy Response
				and there is no residual contamination.	progress at the site. The text has been modified to indicate that materials to be disposed of off site will be inspected to assure that contaminated sediment is not included in the waste stream.
8	30	7.6	-	<p><i>Wastewater Disposal</i></p> <p>The text states “Liquid wastes generated during the project will be collected and stored on site using roll-off tanks or other transportable tanks. Water will be tested for contaminants and, if clean, be either recycled through WATS or disposed of on site after consultation with the Navy, NASA ARC, and regulatory oversight agencies.”</p> <p>a. Please clarify what contaminants will be tested.</p> <p>b. The method detection limits for each analyte should be added to Worksheet #15 – Reference Limits and Evaluation Table (See Specific Comment 12d).</p>	<p>Comments noted.</p> <p>Regarding 8(a), the text has been modified to add the COECs as analytes for wastewater monitoring.</p> <p>Regarding 8(b), wastewater monitoring is not directly related to the RGs and will not be included in the SAP, which focuses on chemical results that pertain directly to the cleanup aspects of the remedy.</p>
<b>Comments from DFG on Appendix A, Quality Control Plan</b>					
9	8	4.5		<p><i>DFOW 5: Sediment Handling</i> - The text states, “... sediment may either be direct-loaded onto trucks for off-site transport and disposal (T&amp;D) at licensed waste facilities, or stockpiled at a laydown area.”</p> <p>a. Please confirm if there will only be one laydown area for the overall project and that it is the one depicted as “soil laydown area” in Appendix D, Figure C-2, Traffic Control and Trail Closure Plan.</p> <p>b. Please describe how the Navy plans to ensure that all contaminated sediments are removed from the laydown areas.</p> <p>c. Please also describe the maximum duration for the excavated stockpiles to remain on site before they are hauled off-site.</p>	<p>Comments noted. The volume of soil to be stockpiled and the laydown areas will be assessed based on waste characterization sampling scheduled for February-March 2012, and the site conditions (e.g., degree of saturation in sediment to be excavated). These factors will affect the volume of soil to be stockpiled, and the size and location of laydown areas. Stockpiles may be placed on areas slated for excavation, with confirmation sampling conducted after removal of the stockpile and the sediment to verify clean conditions have been attained. All areas will be located within IR Site 25. The maximum duration of on-site storage is anticipated to be less than 4 months.</p>

**NAVY RESPONSES TO COMMENTS (REVISED)**  
**DRAFT REMEDIAL DESIGN/REMEDIAL ACTION WORK PLAN**  
**REMEDIAL ACTION AT IR SITE 25**  
**FORMER NAS MOFFETT FIELD**  
**MOFFETT FIELD, CALIFORNIA**  
**MARCH 2011**

No.	Page	Section	Para-graph	Comment	Navy Response
<b>Comments from DFG on Appendix B, Sampling and Analysis Plan</b>					
10	23, 26	WS#10	-	<p>a. Page 23. The text states, “samples of the import material will be collected and analyzed for chemicals listed in the Information Advisory Clean Imported Fill Material (DTSC, 2001) based on the source of the material.” Please ensure that the imported material also meets the Water Board’s wetland cover criteria and include a table that lists their values. For chemicals without wetland cover criteria, please identify other benchmarks based on ecological no adverse effect thresholds that will be used. In addition, the number of samples by volume that will be required for fill material should be enumerated.</p> <p>b. Page 26. The text states, “If chemical concentrations in the import material do not exceed site-specific action levels, then the material will be used to backfill the excavation.” As stated previously, the text should distinguish between the site-wide average and the do-not-exceed remediation goals. Therefore, the text should be revised to state, “If chemical concentrations in the import material do not exceed site-wide average remediation goals (see Worksheet #15) or other ecological no adverse effect levels, then the material can be used to backfill the excavation [highlighted and underlined text indicates suggested edits].”</p>	<p>Comments noted. Regarding (a), WS#17 has been revised to indicate that the sampling frequency for on-site borrow material (replacing the import fill) will be one sample per 500 cubic yards (CY). WS#10 and WS#18 have been edited to indicate that borrow material will meet the do-not-exceed (upper bound) RGs and will also be used in the calculation to attain the side-wide average (lower bound) RGs.</p> <p>Regarding (b), page 26, 2<sup>nd</sup> para. of the text has been edited as follows:</p> <p>“If chemical concentrations in the import material do not exceed the do-not-exceed remediation goals, then the material will be used to backfill the excavation. The import material samples will also be used in the calculation to attain the site-wide average RGs.”</p>
11	-	WS#11	-	<p>The text states “If the concentrations of COECs in the imported material are lower than the do-not-exceed remediation goals, and any additional contaminants deemed relevant based on DTSC guidance (see Attachment 4) are below RWQCB environmental screening levels (see Attachment 5), then the material will be considered suitable for use as backfill material in areas where backfill is required...”</p> <p>a. See Specific Comment 10 above regarding appropriate chemical concentration criteria for imported fill.</p> <p>b. RWQCB environmental screening levels as presented in</p>	<p>Regarding (a) and (b), comments noted. Please see response to Water Board general comment no. 2 above.</p>

**NAVY RESPONSES TO COMMENTS (REVISED)**  
**DRAFT REMEDIAL DESIGN/REMEDIAL ACTION WORK PLAN**  
**REMEDIAL ACTION AT IR SITE 25**  
**FORMER NAS MOFFETT FIELD**  
**MOFFETT FIELD, CALIFORNIA**  
**MARCH 2011**

No.	Page	Section	Para-graph	Comment	Navy Response
				<p>Attachment 5 are based on human health protection under residential and industrial scenarios. Please justify why these screening values are also protective of salt marsh ecological receptors or propose alternative criteria.</p> <p>c. Please clarify under what conditions would backfill be required. See Specific Comment 6.</p>	<p>Regarding (c), comment noted. As previously mentioned, the Navy has developed a salt marsh habitat restoration plan (Appendix H to the RD/RAWP), designating what areas are to be backfilled.</p>
12	-	WS#15		<p>a. The Project Action Limit Reference must be changed from “Do-Not-Exceed Remediation Goal” to “Site-Wide Average Remediation Goal.” Please rectify all other numeric reference so that it is consistent to the site-wide average remediation goal (e.g., project action limit and project quantitation limit). This comment applies to both the sediment and imported fill material matrices.</p> <p>b. Although laboratory-specific quantitation limit (QL) and method detection limit (MDL) can be stated as “To Be Determined”, it should be clarified that the QLs and MDLs must be less than the Project Quantitative Limit Goal. This comment applies to both the sediment and imported fill material matrices.</p> <p>c. The Project Quantitative Limit Goal for DDT and its isomers (DDE, DDD, and DDT) must be revised to 0.016 mg/kg (Navy 2010). This comment applies to both the sediment and imported fill material matrices.</p> <p>d. This worksheet should include project action reference limits for chemicals in wastewater. DFG-OSPR suggests the Surface Water Screening Levels for Estuary Habitats (Table F-2c; RWQCB, 2008) be used as project action reference limits.</p>	<p>Comments noted. Regarding (a), for confirmation sampling, the use of the do-not-exceed (upper bound) RGs as the acceptance criteria for closure of an excavation site is consistent with the description of the selected remedy for the site, as described on Page 29 of the Final IR Site 25 ROD (Navy, November 2009). For acceptance of fill material, tests for the site-specific COECs will be conducted and results will be compared to the do-not-exceed (upper bound) RGs on an individual basis, to attain the site-wide average (lower bound) RGs, as defined in the IR Site 25 ROD (Navy, 2010). The tables for sediment and fill material have been edited appropriately.</p> <p>Regarding (b), the PLs and MDLs have been added, based on the recently selected testing laboratory.</p> <p>Regarding(c), the lower bound RGs will be used in setting Project Quantitative Limit Goals for confirmation sampling and testing of borrow material. The tables for sediment and fill material have been edited to reflect this change.</p> <p>Regarding (d), The SAP does not address waste characteristics but focuses on the chemistry requirements related to decisions directly concerning the cleanup at IR Site 25. The MDLs to be used in monitoring surface water within SWRP at IR Site 25 are indicated in Table 3 of Revision 02 to the RD/RAWP.</p>

**NAVY RESPONSES TO COMMENTS (REVISED)**  
**DRAFT REMEDIAL DESIGN/REMEDIAL ACTION WORK PLAN**  
**REMEDIAL ACTION AT IR SITE 25**  
**FORMER NAS MOFFETT FIELD**  
**MOFFETT FIELD, CALIFORNIA**  
**MARCH 2011**

No.	Page	Section	Para-graph	Comment	Navy Response
13	-	Attachment 3, ITSI SOPs	-	The Standard Operating Procedure (SOP) for XRF in the subject document is not relevant since that method is not proposed for use in the RD/RAWP process. Please clarify how this information is relevant or remove it.	Comment noted. The SOP would support XRF testing that could possibly be conducted as a field screening method to assist in the potential overexcavation effort, should confirmation sampling indicate that the do-not-exceed remediation goal has not been attained. ITSI typically uses Model Alpha 400 by InnoveX, but at this point, there is no specific plan for XRF testing. Please note that all formal confirmation samples will be tested in a certified stationary laboratory.
14	-	Attachment 3, ITSI SOPs	-	This SOP describes methods for collecting soil samples, and does not appear relevant to test pit sampling. Please clarify how this information is relevant or remove it.	Comment noted. The SOP addresses how to conduct soil sampling and will be helpful in conducting the sediment sampling at IR Site 25.
<b>Comments from DFG on Appendix E, Biological Assessment</b>					
15	1	I	-	DFG-OSPR requests that surveys for the California Clapper Rail, the California Black Rail, and rare plants be sent to both USFWS and DFG-OSPR concurrently.	Concur. The reports have been included as Appendix G to Revision 2: Draft RD/RAWP.
16	6-7	II.a.2	-	The Navy states, "The areas where direct effects could occur are depicted in Figure 1 as being within 100 feet of any of the polygons to be excavated." Please revise Figure 1 to include the borrow area as a Direct Effects Action Area, given ground disturbance, vegetation clearing, and surface modification would occur there. Please note, the biological avoidance, minimization, and mitigation measures will also apply to the borrow area.	Concur. The BA has been updated to indicate the borrow areas as Direct Effect Action Areas.
17	7-10	II.b		Measures Proposed to Avoid, Minimize, and Compensate for Effects to Listed (and/or Proposed) Species and Critical Habitat to be Incorporated into the Proposed Action.  a. 1st bulleted measure. The Navy states, "A qualified biologist will be present on site during all work activities to monitor for federally-listed species during topographic and bathymetric surveys and sediment sampling." Please revise the text to state, "A qualified biologist approved by USFWS and DFG will be present on site during all work activities in habitat	Comments noted. The Navy developed the BA as a submittal to USFWS for review and comment. The Navy is committed to working with California DFG, will consider all comments offered, and will communicate and coordinate with California DFG during field activities.

**NAVY RESPONSES TO COMMENTS (REVISED)**  
**DRAFT REMEDIAL DESIGN/REMEDIAL ACTION WORK PLAN**  
**REMEDIAL ACTION AT IR SITE 25**  
**FORMER NAS MOFFETT FIELD**  
**MOFFETT FIELD, CALIFORNIA**  
**MARCH 2011**

No.	Page	Section	Para-graph	Comment	Navy Response
				<p>areas to monitor for all sensitive species.”</p> <p>b. 2nd, 3rd, and 4th bulleted measures. Please add the following avoidance and minimization measure to these sections. If an individual of a special status species (i.e., California Clapper Rail, California Black Rail, Western Snowy Plover, California Least Tern, SMHM, etc.) does not leave the work area on its own volition, then no work shall commence until UFWS and DFG has made a determination on how to proceed.</p> <p>c. 3rd bulleted measure. If California Clapper Rails and California Black Rails are present within 700 feet of the proposed project, the Navy states, “The project applicant will then coordinate with USFWS in regards to appropriate measures to avoid or minimize adverse effects to the species.” Since the California Clapper Rail is also a State endangered species and the California Black Rail is a State threatened species and both are State fully protected species, please revise the text to state that the project applicant will coordinate with both USFWS and DFG.</p> <p>d. 4th bulleted measure. The Navy states, “If a mouse of any species is observed within the areas being cleared of pickleweed or within 50 feet of pickleweed, the USFWS will be notified. Unless otherwise approved by the USFWS, the mouse will be allowed to leave on its own volition. Removal of pickleweed and vegetation within 50 feet of pickleweed may begin when no mice are observed, or with USFWS approval...” Since the SMHM is also a State endangered species and State fully protected species, please revise the text to include DFG in the notifications and approvals.</p> <p>e. 4th bulleted measure. Please add the following avoidance and minimization measures to this section for the SMHM.</p> <p>(1) Equipment and personnel shall be limited to the areas</p>	<p>Regarding (b) and (c), text edits have been made in the RD/RAWP to include DFG on the list of agencies to be notified.</p> <p>Regarding (d), text edits have been made in the RD/RAWP to include DFG on the list of agencies to be notified.</p> <p>Regarding (e)(1), the Navy concurs. Text has been added to</p>

**NAVY RESPONSES TO COMMENTS (REVISED)**  
**DRAFT REMEDIAL DESIGN/REMEDIAL ACTION WORK PLAN**  
**REMEDIAL ACTION AT IR SITE 25**  
**FORMER NAS MOFFETT FIELD**  
**MOFFETT FIELD, CALIFORNIA**  
**MARCH 2011**

No.	Page	Section	Para-graph	Comment	Navy Response
				<p>where the vegetation has been cut.</p> <p>(2) Visqueen fencing shall be installed between areas of SMHM habitat and work sites immediately following vegetation removal and before excavation activities begin to prevent entry of SMHM into cleared areas. The fencing shall be trenched into the ground and backfilled to prevent SMHM from moving underneath the fencing. Fence stakes shall face towards the work site, away from the habitat. The final design and proposed location of the fencing shall be reviewed and approved by USFWS and DFG prior to placement. The qualified biologist will have the ability to make field adjustments to the location of the fencing depending on site-specific habitat conditions.</p> <p>(3) A qualified biologist or site manager shall monitor site fencing to ensure that the fencing remains an effective barrier to prevent entry of SMHM into work areas. Monitoring of the fencing is required: a) periodically throughout each work day during work within 300 feet of the fence; b) at least twice per week during clear weather; and c) within 24 hours after every storm or one-quarter inch of precipitation (on the San Rafael gauge at <a href="http://cdec.water.ca.gov/precip_maps/">http://cdec.water.ca.gov/precip_maps/</a>) or more within a 24 hour period, or winds greater than 20 miles per hour. Maintenance of the fencing shall be conducted as needed throughout the work period. Any necessary repairs to the fencing shall be completed within 24 hours of the initial observance of the damage. Work shall not continue within 300 feet of the damaged fencing until the fences are repaired and the site is surveyed by a qualified biologist to ensure that SMHM have not entered the work area.</p>	<p>reflect comment.</p> <p>Regarding (e)(2), the Navy will install silt fences along temporary access roads in vegetated areas to keep wildlife from entering the roads. Also, a biologist(s) will inspect each piece of heavy equipment and each truck prior to moving. A biologist(s) will also inspect the ground and each piece of equipment as it moves through sensitive habitat. Text has been added to Revision 2: RD/RAWP accordingly. Resumes of biologists will be included in the Draft-Final RD/RAWP.</p> <p>Regarding (e)(3), silt fences along access roads will be monitored at a minimum frequency of once during each working day. Text was added to Section 8.4 to reflect this approach.</p>
18	9	-	-	<p>The text states, "After sediment excavation activities, excavated areas will be restored to resemble their pre-RA condition." See Specific Comment 1a(3) above.</p>	<p>Comment noted. As previously discussed, the Navy developed a salt marsh habitat restoration plan as Appendix H to Revision 2: RD/RAWP that provides details on site restoration and monitoring.</p>

**NAVY RESPONSES TO COMMENTS (REVISED)**  
**REVISED DRAFT REMEDIAL DESIGN/REMEDIAL ACTION WORK PLAN**  
**REMEDIAL ACTION AT IR SITE 25**  
**FORMER NAS MOFFETT FIELD**  
**MOFFETT FIELD, CALIFORNIA**  
**MAY 2011**

No.	Page	Section	Para-graph	Comment	Navy Response
<i>Comments from Elizabeth Wells, California Regional Water Quality Control Board, San Francisco Bay Region, dated 07 June 2011</i>					
1	-	4.2.1	-	Confirm with NASA that its east-side stormwater management system can handle the additional volume of water proposed. Diverting the WATS effluent water will add 50 gallons per minute (gpm) to the stormwater system.	Concur. NASA ARC (M. Hightower) has been apprised of the proposal to divert WATS effluent and has approved the approach. Text has been clarified to note this approval. This activity was also included in the application for the NASA construction permit.
2	-	4.2.2	-	<p>a. Discuss how bottom/levee scour and fish kill will be prevented during pumping of water from the stormwater retention pond to U.S. Fish and Wildlife Alviso Pond A2E. The Navy proposes to pump 1,000 gpm, which is a high flow rate; depending on how the pump discharge is placed, disturbance and damage to the receiving pond could result.</p> <p>b. Provide more details on how “The pump intake will be configured in a way to prevent uptake of sediment.” No design information is given to support this statement.</p> <p>c. Water Board staff concur with the Navy’s proposal to conduct baseline sampling of the receiving water (Alviso Pond A2E) and the standing stormwater. Because of the sensitivity of the receiving water (presence of fish and ducks, discharges to San Francisco Bay), Water Board staff request baseline water samples be analyzed for salinity, total dissolved solids, and total suspended solids in addition to the Site 25 chemicals of concern (COCs).</p> <p>d. Provide justification for compositing the water samples prior to analytical testing.</p> <p>e. Water Board staff disagree with the sampling program proposed for during pumping. The objective of the sampling is to demonstrate that COCs are not being transferred from Site 25 to Alviso Pond A2E. Therefore, confirmation that COCs are not present at concentrations greater than agreed-upon limitations</p>	<p>Comment noted. Regarding 2(a) and 2(b), the text in Section 4.2.2, SWRP Water Diversion, has been edited to include that the volume of water to be pumped is now estimated to be 100,000,000 gallons. To allow the sediment removal activities to commence in August 2012, the pumping scheme will be to conduct two phases of pumping, each with a flow rate of 3,500 gpm. During both phases, the pump(s) will draw from a submerged intake manifold sitting on the bottom of the source water body aligned with perforations pointing upward. The pump discharge will use both water cannons (large irrigation heads) and submerged discharge manifolds sitting on the bottom of the receiving water body with perforations pointing upward.</p> <p>A form has been developed to record daily inspections of the SWRP dewatering pump systems. The pump intakes and discharge outfalls will be visually inspected to check the status and the turbidity at the intake location and at the discharge point. Water samples will be periodically collected at the pump discharge and measured for turbidity.</p> <p>Regarding 2(c), the Navy will sample for COECs, salinity, TDS, and will conduct field monitoring for turbidity. Table 3, <i>Sampling for SWRP Water Diversion</i>, has been revised to reflect these monitoring and sampling activities.</p> <p>Regarding 2(d), the Navy concurs. No compositing will be done.</p> <p>Regarding 2(e), the Navy will conduct sampling to assess water</p>

**NAVY RESPONSES TO COMMENTS (REVISED)**  
**REVISED DRAFT REMEDIAL DESIGN/REMEDIAL ACTION WORK PLAN**  
**REMEDIAL ACTION AT IR SITE 25**  
**FORMER NAS MOFFETT FIELD**  
**MOFFETT FIELD, CALIFORNIA**  
**MAY 2011**

No.	Page	Section	Para-graph	Comment	Navy Response
				should be conducted prior to discharge.	quality within IR Site 25. Alviso Pond A2E will NOT be used as a receiving water body.
3	-	6.5.1	-	<p>a. Provide justification for why on-site material for backfilling and revegetation will be beneficial for rapid re-vegetation.</p> <p>b. Discuss why leaving the borrow area unfilled will not affect the stormwater pond in the future. A large area (approximately 600 feet by 600 feet by 1 foot deep) will be excavated to obtain soil for placement in excavated cells, but is not proposed for backfilling.</p>	<p>Comments noted.</p> <p>Regarding 3(a), observations at the site indicate that sensitive habitat flora such as pickleweed flourish in the sediment. The chances of successful re-establishment of pickleweed in placed sediment derived from another location at the site are therefore considered enhanced when compared to re-establishment in imported fill from a quarry and upland location; the imported fill would have significantly different characteristics from on-site sediment.</p> <p>Regarding 3(b), the borrow areas are routinely inundated and non-vegetated; shallow (less than 2-foot) excavations will not significantly change the hydraulic conditions of IR Site 25, will increase the capacity of the SWRP for storm events, and will over time fill back in due to natural siltation processes. The Navy has discussed this approach with NASA and they concur.</p>
4	-	Table 3	-	Revise the proposed sampling schedule so that the sampling frequency increases as the water level in the stormwater pond decreases. As the water level decreases, the pump is more likely to pick up and transport sediment, thereby increasing the chance of transferring COC-laden sediment to Alviso Pond A2E.	Comment noted. By keeping water diversion activities within the confines of IR Site 25, the risk of transferring COECs offsite is negligible. The Navy will conduct sampling activities to monitor water quality within the SWRP.
<i>Specific Comments from Lenny Siegel, Executive Director, Center for Public Environmental Oversight, dated 16 June 2011</i>					
				We endorse the June 7, 2011 comments submitted by the Bay Region of the California Regional Water Quality Control Board as well as the June 7, 2011 memo from the California Department of Fish and Game (DFG).	Comment noted. Please see Navy responses to Water Board comments above and Navy responses to DFG comments in the RTC table for the draft RD/RAWP.
2	-	-	-	We believe that an Ecological Restoration Plan should be included in the RD document	Comment noted. A salt marsh habitat restoration plan is now included as Appendix H to Rev 02 of the RD/RAWP.

**NAVY RESPONSES TO COMMENTS (REVISED)**  
**REVISED DRAFT REMEDIAL DESIGN/REMEDIAL ACTION WORK PLAN**  
**REMEDIAL ACTION AT IR SITE 25**  
**FORMER NAS MOFFETT FIELD**  
**MOFFETT FIELD, CALIFORNIA**  
**MAY 2011**

No.	Page	Section	Para-graph	Comment	Navy Response
3	-	-	-	Please confirm that Western pond turtle habitat will be protected not only in the Eastern Diked Marsh, as proposed, but also in the Northern Channel due to the diversion of Westside Aquifers Treatment System effluent. We do not expect that this will have an effect, but there is no analysis in the document to support this. We also agree with DFG's comments urging additional measures to protect the Western Pond Turtle in the Eastern Diked Marsh.	<p>Comment noted. As stated in the responses to DFG's comments, the Navy is not aware of any WPTs being observed in the areas to be excavated (in 1998, one WPT was sighted at the settling basin), and conditions at IR Site 25 are regarded as marginal WPT habitat, at best. NASA conducted biological surveys of the EDM around 2003. No turtles were observed in this survey. No WPTs have been observed in any recent surveys conducted by the Navy.</p> <p>The EDM has no hydrological connection to the Stevens Creek system or NASA's east side storm water drainage ditches that lead to the North Channel, where turtles are known to be. Diverting WATS effluent to the Northern Channel will not increase the body burden of contaminants to WPTs, as the WATS effluent is highly treated and sampled groundwater that is devoid of contaminants.</p> <p>Regarding other comments from DFG concerning WPTs, WPT trapping does not appear to be warranted at this time. During the RA, the biologist(s) will inspect each site planned for excavation prior to daily activities. Also, active excavation operations will be continuously observed by the biologist (or multiple biologists if work is being conducted in multiple areas) who will have authority to shut down the activity should a WPT or other listed species be observed. Silt fencing will be installed along access roads leading to excavations, to prevent wildlife interference with vehicles and equipment. The Navy is committed to preservation of all species, including the WPT, and will take appropriate measures to mitigate any possible negative impacts.</p>
4	-	3.4	-	This section is too general. The frequency of inspections of replanted vegetation should be provided, rather than saying it will be inspected "periodically." Also, please specify how you will decide when and where irrigation is required, and provide a more detailed explanation of long-term ecological monitoring. Merely stating that long-term ecological monitoring will be done is not	Comment noted. As stated above, a salt marsh habitat restoration plan, including descriptions of operation and maintenance activities, is now included as Appendix H to Revision 2: RD/RAWP.

**NAVY RESPONSES TO COMMENTS (REVISED)**  
**REVISED DRAFT REMEDIAL DESIGN/REMEDIAL ACTION WORK PLAN**  
**REMEDIAL ACTION AT IR SITE 25**  
**FORMER NAS MOFFETT FIELD**  
**MOFFETT FIELD, CALIFORNIA**  
**MAY 2011**

No.	Page	Section	Para-graph	Comment	Navy Response
				sufficient in a Design document. Also, please specify who is responsible for this activity, as well as what regulatory oversight is expected.	
5	-		-	The Sampling and Analysis Plan (SAP) states that confirmation sampling is geared towards the size of the area removed, roughly collecting one sample from the excavated bottom in every 100'x100' excavated area. Within each excavation area the Navy should also take at least two samples (more if the area adjacent to it has relatively high concentrations) from unexcavated sediments on the perimeter of the excavated footprint. These samples should be taken from locations that are in the direction of the higher concentration polygons.	Comment noted. The intent of the confirmation testing program is to verify that contamination in the vertical profile has been removed to meet Remediation Goals (RGs). The areal extents of the contaminated polygons, with some minor changes based on additional testing conducted in fall-winter 2010 (Pre-design Investigation of Sediment), were published in the Record of Decision and were derived based on a long-agreed to process of investigating the site (Thiessen Polygon method), as described in the previous documents for IR Site 25 published by the Navy over the years. The Navy has discussed this with the regulatory agencies and has agreement to the current confirmation sample strategy, which does not include lateral sampling.
6	-	-	-	We also ask that the confirmatory sampling plan make an effort to confirm the accuracy of the Thiessen Polygon method for determining areas of high concentration. Many of the polygons covering large areas do not require excavation at all, and since sampling equipment will be on site it would be prudent to confirm that they are accurate. (See DFG General Comment 5.)	Comment noted. Please see response to Specific Comment 5 above. The SAP will be edited to add confirmation samples at large polygons, as described in the response to USEPA Specific Comment 6 on the Draft RD/RAWP.
7	-	-	-	Please state how the Navy will proceed if any of the confirmatory samples test positive, above the remedial objective, for any of the contaminants of concern. Specify how much additional material will be removed, and describe how you propose to conduct a second round of confirmatory sampling.	Comment noted. Text has been added to Section 6.4 of the RD/RAWP, to describe the approach to possible overexcavation in 0.5-ft increments (based on results of confirmation sampling) followed by another round of confirmation sampling.