

Arc Ecology

Environment, Economy, Society, & Peace

Mr. Thomas Macchiarella
BRAC Environmental Coordinator
Department of the Navy, Southwest Division
Naval Facilities Engineering Command
1220 Pacific Highway
San Diego, CA 92132-5190

July 15, 2004

RE: Draft Site Management Plan for Fiscal Year 2005, Alameda Point, Alameda, California

Dear Mr. Macchiarella,

Thank you for providing Arc Ecology with the opportunity to review the *Draft Site Management Plan for Fiscal Year 2005, Alameda Point*. We agree that public review of annual updates to the site management plan is an important part of the cleanup process. Soliciting public comment on the site management plan (SMP) and the priorities for the upcoming year fosters an essential environment of teamwork between the Navy, regulators, and the community that is necessary in achieving a cleanup acceptable to all players. We have the following comments and suggestions to offer:

Funding Shortfalls

At the July meeting of the Restoration Advisory Board (RAB), we learned that due to funding shortages, remediation work at many sites would be delayed substantially. As you might imagine, we are incredibly disappointed to hear that an already slow cleanup will be even slower over the next couple of years. Investigation and remediation work at Alameda Point has been on going since 1993 yet most sites are still in the Remedial Investigation/Feasibility Study stage. Five new sites were added to the cleanup just last year. The City of Alameda and its residents should not be burdened with further delays in the cleanup and reuse of this property. A funding shortfall is an unacceptable excuse for delaying the SMP.

Priorities

We were pleased to hear at the July RAB meeting that priority will be given to residential and school sites. This, however, is not entirely reflected in the site management plan. The feasibility study (FS) for soil at OU-5 Site 25 (also known as Coast Guard Housing) has been delayed twelve months “primarily to respond to significant comments to the original draft FS.” Comments on the OU-5 soil FS were submitted 8 months ago. This would seem like a sufficient amount of time to respond to “significant comments.” Does the 12-month delay include the past 8 months or is it in addition to these 8 months? The need for an additional delay is unclear. We

urge you to shorten this delay and to work more aggressively towards a final remedy for this area.

While we agree that residential and school sites should be the priority, there are other sites that we believe should be given greater attention whose schedules are now being delayed. Most notably is OU-2B. The groundwater beneath OU-2B is contaminated by a plume of TCE and other solvents that extends nearly a quarter of a mile in length, eventually dumping into the Seaplane Lagoon. The potential human health and ecological risks posed by this site are significant. Several of the buildings above the plume are currently being used by businesses yet the indoor air has not been tested to determine the inhalation risk from the volatile organic compounds found in the groundwater.

Despite all of this, the new SMP proposes a 16-month delay in the FS and subsequent activities. This, according to the summary of scheduled changes distributed on July 6, 2004, would allow funding originally assigned to OU-2B to be used for a site with higher priority. What site, specifically, does the Navy believe is of higher priority and why was that site not adequately funded? Once again, a lack of funding is an unacceptable excuse for the delay in cleanup. We urge the Navy to give higher priority to OU-2B.

The same could be said for Sites 1 (OU-3) and 14 (OU-1). In both of these areas, groundwater plumes are approaching the Bay. At Site 1, there are documented discharges of contaminated groundwater reaching the Bay. A higher priority should be given to these sites and more funding should be appropriated to them to avoid further delays in remediation.

Wasted Funds

Much of the work that remains at Alameda Point may have already been completed if the initial remedial investigation (RI) reports had been of better quality. For the majority of operable units at Alameda Point, second and third iterations of the initial draft document have been required due to the poor quality of the initial draft. This waste of taxpayer money is appalling and continues to occur. For example, as noted in the changes to the SMP, there will be a delay in the schedule for the OU-1, OU-2A, and OU-2B RIs due to extensive regulator comments. Indeed, EPA's toxicologist has requested that the risk assessments be completely redone. This type of delay could have easily been avoided had the initial reports been more thoughtfully prepared. We can only hope that with the expected decrease in quantity of documents in FY 2005 there will be an increase in quality.

Community Relations Plan

During the last revision of the Community Relations Plan (CRP), the Navy assured the community that updates would be made annually. There is no mention of an update to the CRP in the SMP for fiscal year 2005. Please revise the schedule to include an update to the CRP.

Arc Ecology appreciates the opportunity to provide input on the SMP for fiscal year 2005. It is our sincere hope that the Navy will consider these comments and will work with the RAB and BCT to find solutions to the problems posed by the funding shortfall.

Regards,



Lea Loizos

Staff Scientist

Cc: Anna-Marie Cooke, US EPA
Judy Huang, Regional Water Quality Control Board
Jean Sweeney, Restoration Advisory Board Community Co-Chair
Marsha Liao, DTSC
Peter Russell, Northgate Environmental Management, Inc.
Senator Barbara Boxer
Senator Dianne Feinstein
Congressman Pete Stark