



## Golden Gate Audubon Society

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Americans Committed to Conservation • A Chapter of the National Audubon Society

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September 6, 2001

Ms. Anna-Marie Cook  
U.S. EPA  
75 Hawthorne Street, (SFD-8-3)  
San Francisco, CA 94105

RE: Comments on the Federal Facilities Agreement (FFA) and Site Management Plan (SMP) for the former Naval Air Station Alameda

Dear Ms. Cook:

I submit these comments on the above-referenced documents on behalf of the Golden Gate Audubon Society. Our comments focus on the proposed workplan for IR Site 2, in Operable Unit 4A, commonly known as the West Beach Landfill and Wetlands, which will become part of the Alameda National Wildlife Refuge.

On September 12, 2000 we wrote to Captain Greg Buchanan, then Commanding Officer of EFA West of Naval Facilities Engineering Command. GGAS expressed its concern over the Navy's failure to sign a FFA with the U.S. EPA. While we are pleased that the FFA has finally been signed, we wish to express our displeasure that it has taken much longer than anticipated. We hope that future efforts to complete the remediation of toxic contaminants at Alameda Point will proceed in a much more expeditious manner.

Now I would like to offer specific comment on Appendix A, the Site Management Plan, specifically, the schedule for Operable Unit 4A. **The schedule outlined is unacceptable to the Golden Gate Audubon Society. Under the schedule, a revised Draft Remedial Investigation (RI) would not be completed until March 2005. This would be five years after the Navy initially committed to completed it. Not only will the proposed schedule delay the development of an important national wildlife refuge; it also poses a potential danger to public safety.** The Hunters Point Shipyard fire at a toxic landfill similar to the West Beach Landfill in Alameda underscores the urgency with which toxic contaminants must be characterized and remediated; an urgency the Navy does not seem to share with the general public. The situation at the landfill may in fact qualify as an "emergency removal action" as defined in Section 20 of the FFA and require immediate attention.

You will recall that the Navy hired Neptune and Company to complete the original draft

RI. Audubon consultants, including Dr. Michael Johnson of the University of California at Davis, an acknowledged expert in the field of ecological risk assessment, found the Neptune draft RI to be riddled with errors, unsubstantiated conclusions, and unscientific study methods. The RWQCB and the EPA also were severely critical of the Neptune Draft RI and joined Audubon in insisting that it be redone. **We are disturbed to see portions of the Neptune draft RI used in the Site Management Plan as if they were credible conclusions.** To its credit, the Navy has already agreed to redo the Neptune draft RI and to collect additional soil samples in the landfill, using a different contractor.

The Revised Draft RI, then, is a repeat first step in the process of assessing and remediating the West Beach Landfill. There is no question that the Navy indiscriminately dumped toxic contaminants into the landfill over twenty years, or that toxic contaminants remain in the landfill. The Revised Draft RI will hopefully identify the location of the contaminants and their type. The proper characterization of the landfill can lead to informed decisions about the remediation strategy.

The future of the West Beach Landfill and the adjacent West Wetlands are critical to the success of the redevelopment of Alameda Point. In a federal-to-federal agency transfer, these lands and wetlands are slated to become part of the Alameda National Wildlife Refuge. On the refuge, the wildlife values of this 110-acre area on the edge of San Francisco Bay are surpassed only by the nesting colony of endangered California Least Terns on the former airfield.

Wildlife habitat is virtually non-existent in the stretch of the San Francisco Bay Shore where the West Beach Landfill is located. Although the area is surrounded by urban development, with active conservation management it will be an oasis of incredible natural resource values and high public use. This cannot happen without thorough and timely cleanup of the toxins which the Navy has left at Alameda Point.

We urge you to modify the SMP milestones for Operable Unit 4A, and to insist that the Navy reallocate the necessary resources to produce the Revised Draft RI for IR Site 2 within the next 12 months.

Thank you for considering our comments. We wish to express our continuing interest in the Alameda FFA and SMP and request copies of any proposed amendments to these documents and timely notification of public comment opportunities.

Sincerely,



Dana Kokubun, Program Director

Comments on the Federal Facilities Agreement (FFA) and Site Management Plan (SMP)  
for the former Naval Air Station Alameda, 9/6/01  
page 3

cc: Senator Dianne Feinstein  
Senator Barbara Boxer  
Representative Barbara Lee  
Representative Nancy Pelosi  
Michael McClelland