

Arc Ecology

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January 16, 2002

Richard Mach
Department of the Navy
Southwest Division
Naval Facilities Engineering Command
1220 Pacific Highway
San Diego, CA 92123-5190

Dear Mr. Mach:

I have reviewed the Pre-final Explanation of Significant Differences for Parcel B, Hunters Point Shipyard, dated December 14, 2001. I have a few suggestions and comments:

- A. I suggest that the document remain open for public comment until at least February 1, 2002, longer if possible. I make this suggestion for two reasons:
1. This ESD was not available to read at the Anna E. Waden library during the most of comment period.
 2. RAB voted on 10/23/01 to approve a TAPP proposal to hire an expert to assist community with ESD review. This expert has yet to be made available to the RAB. Public comment deadline needs to be extended until this expert is contracted and has met with the RAB.
- B. Comments on Shoreline Remedy
1. page 2, section 3.1: Navy claims that shoreline protection remedy is needed "due to significantly different site conditions at the Parcel B shoreline." Significantly different than what? Suggest removing this phrase.
 2. Shoreline protection remedy needs to be described in more detail for me to make an informed assessment. What are the chemicals of concern are to be encapsulated? What are their concentrations? How long would such a remedy last? Who would be responsible for maintaining it, or replacing it if necessary? Would monitoring be required to ensure its long-term effectiveness? More detail about anticipated costs, including costs to monitor, are needed.
 3. Navy claims in Section 5.0 (page 7), "The shoreline protection remedy likely will be accepted by the community, because short-term disturbances are minimal and long-term effectiveness is adequate for the protection of human health and the environment." Navy should wait for the community to comment before making this assessment.
 4. On what basis did the Navy determine that this remedy is "adequate?"

C. Comments Soil Vapor Extraction (SVE) System

1. How did the Navy determine that SVE will take 2 years to complete? It seems to me that this can't be known unless the Navy has estimated the size and concentration of the source area. Where is this assessment documented?
2. Navy should offer more of the design details in the ESD, not exclusively in the RD amendment. There are issues that the community needs to discuss, evaluate, and propose mitigations for. These include noise, fugitive emissions, and duration of operations.
3. Even though Navy evaluated SVE in the original Feasibility Study, Navy should reprint "nine criteria" analysis in this ESD. This will facilitate community review.

D. Groundwater Point of Compliance

1. Navy should specify how they intend to define (find) the inland border of the tidal mixing zone. Exactly what parameters will be measured and why? What will they be compared to? Navy should prepare a technical memorandum and then specify the inland boundary of the tidal mixing zone in the ESD, rather than shunt it to the RAMP. This is because the RODs is a public document and more easily available to the public than the RAMP ever will be.

E. Unresolved issues

1. Navy should resolve IR-7 issues before finalizing the ESD. I am uncomfortable with the prospect of yet another ESD later this year to resolve the IR-7 issues. How many ESDs equal a ROD amendment? I think it is inappropriate that the public should have to defend the ROD against changes made by numerous ESDs.
2. I believe that shoreline encapsulation is a fundamental change and ought to be handled with a ROD amendment so that public comment may be officially recorded. If the Navy anticipates that a ROD amendment will be necessary for IR-7, then the Navy should wait to evaluate the shoreline protection remedy in a ROD amendment.

Thank you for giving us the opportunity to comment on this document. Please feel free to call me with any questions.

Sincerely,



Christine Shirley
Staff Scientist

Cc: (list attached)

CARBON COPY LIST

COMMENTS ON THE PRE-FINAL EXPLANATION OF SIGNIFICANT DIFFERENCES

THE ABOVE IDENTIFIED LIST IS NOT AVAILABLE.

EXTENSIVE RESEARCH WAS PERFORMED BY
SOUTHWEST DIVISION TO LOCATE THIS LIST.

THIS PAGE HAS BEEN INSERTED AS A
PLACEHOLDER AND WILL BE REPLACED
SHOULD THE MISSING ITEM BE LOCATED.

QUESTIONS MAY BE DIRECTED TO:

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