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Petaluma, California 94954

DEPARTMENT OF THE NAVY
Base Realignment and Closure
Program Management Office West
1455 Frazee Road, Suite 900
San Diego, CA 92108-4310

July 5, 2007

RE: Comments on Draft Wetlands Mitigation & Monitoring Plan. Metal Debris Reef & Metal Slag Areas Parcels E and E-2.

Draft Remediation Investigation/Feasibility Study. Hunters Point Shipyard.

Dear Ms. Kito,

Thank you for the opportunity to comment on the Draft Wetlands Mitigation and Monitoring Plan (Metal Debris Reef & Metal Slag Areas Parcels E and E-2), and the Draft Remediation Investigation/Feasibility Study (Hunters Point Shipyard).

Candlestick Point State Recreation Area (SRA) is located in the southeast part of the city and county of San Francisco. Being the first state park purposely acquired to bring the State Park System into an urban setting, Candlestick is readily accessible to over four million citizens. The park offers beautiful views of the San Francisco Bay, with picnic areas, fishing (including two fishing piers), and hiking trails (including a fitness course for seniors and a bike trail).

In 1987, the State Parks System approved the Candlestick Point State Recreation Area General Plan after much public participation and feedback. The Plan identified the restoration of natural areas within the Yosemite Slough as a high priority. In 2003, a total of 34-acres, including the Yosemite Slough, was assessed for restoration potential in a feasibility study funded by the California State Parks Foundation. The study showed that restoration of this area is possible and would be extremely beneficial for the entire Bay.

As a result, the Yosemite Slough Restoration plan was developed in accordance to the General Plan. It offers the most comprehensive recreational, educational and clean up opportunities for this area. The restoration of the Yosemite Slough will create the largest contiguous wetland area in the County of San Francisco. The project will help restore essential wildlife habitat, improve water quality, and prevent erosion along the shoreline of the City of San Francisco—an area of the Bay where tidal wetlands have been most impacted and suffered the greatest loss due to urbanization. The Yosemite Slough

Restoration project will also be accessible to visitors and will serve Bayview Hunters Point, a community that has been impacted by environmental degradation.

Goals and objectives of the Yosemite Slough Restoration Project include the following:

- 1) Increase the area subject to tidal influence by excavating three areas that were formerly part of San Francisco Bay
- 2) Restore habitat diversity by adding 12 acres of tidally-influenced wetlands and marsh area and remove chemically-impacted soils from upland areas to improve the quality of existing habitat
- 3) Improve habitat for special status species (e.g. western snowy plover and double-crested cormorants) by creating two nesting islands
- 4) Improve quality of life for the surrounding community by creating a clean, beautiful local park for viewing wildlife habitat
- 5) Create an environmental area that local schools can use for field trips
- 6) Connect to the Blue Greenway, an important effort to build 13-miles of Bay Trail along the southern waterfront of the San Francisco Bay Trail

Currently, State Parks in partnership with the California State Park Foundation, is in the process of completing the final design, construction estimates and permitting phase of the restoration component. Cleanup of chemically-impacted soils near the Bay's shoreline, restoration of the wetlands and construction of new facilities are expected to begin in January 2008 (note attached Yosemite Slough Restoration Figure).

In reviewing the Navy's Draft Wetlands Mitigation & Monitoring Plan (Metal Debris Reef & Metal Slag Areas Parcels E and E-2), staff recommends that the Navy review the State Park Foundation Yosemite Slough Restoration Plan. Actual plan sheets may be available for your review by contacting me. Since parcels E and E-2 are in close proximity to the Yosemite Slough project area, State Parks strongly encourages that Navy wetland design engineers review the Yosemite Slough design sheets. State Park staff may also be open to facilitating a meeting between Navy and State Park design teams to review plans, share design ideas, and to brain storm ways in which the Navy's wetland site can meet its objectives while reflecting a design that provides ecological continuity between Yosemite Slough and the Navy's E and E-2 parcels.

Although Section 1.5 of the Navy Wetlands Mitigation and Monitoring Plan makes reference to the wetlands as occurring, "... in an area with known hazardous substances and therefore have diminished social or biological value", and furthermore states that, "...the assessed capability of these tidal wetlands to perform functions based on their physical, chemical, or biological characteristic is low", State Parks urges the Navy to look at restoration and remediation alternatives that provide the maximum optimal level of hazardous waste removal to maximize tidal wetland biological value. State Park staff encourages the Navy to explore and develop design options that provide a tidal wetland system that is physically, structurally, functionally, and chemically functional. To achieve this goal of providing a biologically significant system that is ecologically functional, State Park staff believes the Yosemite Slough restoration plans can provide the Navy with a sound design template. Also, if a similar design were

to occur on the Navy E and E-2 sites and if the project could be implemented during Phase II Yosemite Slough construction scheduling, cost savings may be realized by the Navy.

With regard to the Draft Remediation Investigation/Feasibility Study Report, State Park staff encourages the Navy to implement a blend of its identified remediation alternatives in such a way that places emphasis on full clean up of hazardous wastes from identified shoreline area "hot spots" that may in the future become prime high intensity public use areas. Full clean up within the shoreline areas seems to be the most viable alternative when considering human and environmental health and safety. The upland areas could include a mixture of retainment and capping on site to partial or full cleanup and removal of hazardous waste. Considering the extent and magnitude of public recreation that will occur within the shoreline and adjacent upland areas, State Park staff would strongly endorse plans that seek to remove underlying hazardous waste from proposed wetland and shoreline areas. While retainment of hazardous waste on site has been identified as a preferred alternative, State Park staff encourages the Navy to develop remediation plans that seek to remove identified hazardous waste hot spots, particularly from areas that will be within high public use areas (shoreline, wetlands and adjacent shoreline upland areas).

The Draft Remediation Investigation/Feasibility Study Report refers to the possibility of instituting land use controls to prevent human contact with contaminants in waste material, groundwater, landfill gas, etc. It is the hopes and wishes of State Parks that the Navy will realize the full potential of the shoreline and adjacent upland areas as prime areas for future human recreational access (bay trail, picnic tables, viewing trailside benches, promenades, viewing platforms, piers, shoreline access, etc), and that these areas in particular should not carry restrictions preventing human access. In turn it is these shoreline and adjacent upland areas that should warrant full cleanup and removal of hazardous waste. State Parks operates Candlestick Point SRA and experience tells us on a daily basis that local citizens and park visitors cherish and expect shoreline access.

Other concerns include the longevity of the geomembrane cap as part of a retainment and cap on site alternative. This alternative fails to account for ground settling, rodent activity, seismic events, and deterioration over time as a function of age and/or contact with hazardous wastes. While this solution may be appropriate in some cases, State Parks recommends that the Navy explore means of developing a hybrid of the "cap" and retain on site and full removal of hazardous waste alternatives in a manner which protects the long term health of humans and the environment, while limiting the amount of future land use restrictions.

Once restoration is complete, shoreline areas within the Yosemite Slough and Hunters Point areas will become prime locations for the much awaited "Bay Trail". In concept, this area could become one of the most popular recreational destination points in San Francisco Bay. State parks is confident, and very optimistic, that once redevelopment of the Hunters Point area is complete it will become a key destination point for millions of visitors to enjoy bay views, open space, picnicking, wildlife viewing, wind surfing, kayaking, hiking, biking, public events, environmental learning, and maybe even overnight camping!

The recreational value of the shoreline area becomes critical when addressing the E and E-2 wetland restoration design. State Park staff strongly urges that Navy design

teams meet with State Park design staff to look at design alternatives that promote a wetland restoration design that provides seamless ecological transition and continuity between Hunters Point and Yosemite Slough. The Navy's current wetland design falls somewhat short of this objective in that the extent of shoreline hardening with rip rap is rather extensive and the wetland itself is discontinuous with the bay. More specifically, State Parks is concerned about the extent of rip rap armoring the wetland area. In effect, the extent and magnitude of riprap isolates the wetland from the shoreline. A wetland design should be developed that provides direct continuity to the bay and to Yosemite Slough. While we understand the need to protect the shoreline from erosion during long duration high intensity storm events, we also believe a design can be developed which protects the shoreline while also providing additional wetland and tidal marsh habitat that has a more direct connectivity to the bay.

Although State Parks understands how limited resources and funding can influence project design, we urge the Navy to consider ways of possibly creating larger areas of shoreline wetlands including fore-bays, narrow slough inlets similar to the adjacent Yosemite Slough, backwater marshes, offshore break-waters, habitat islands, etc. Hazardous waste hot spots, if fully removed, could be incorporated into back-bay, fore-bay, and or inlet wetland design plans.

Thank you for the opportunity to comment on the Draft Wetlands Mitigation and Monitoring Plan (Metal Debris Reef & Metal Slag Areas Parcels E and E-2), and the Draft Remediation Investigation/Feasibility Study (Hunters Point Shipyard). If you have any questions please contact me anytime.

Sincerely,

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cc: Don Monahan, Diablo Vista District Superintendent
Craig Mattson, Bay Sector Superintendent
Marla Hastings, Environmental Scientist