



August 10, 2007
Project 4850.005.3

Mr. James B. Sullivan
Mr. Charles Perry
Department of the Navy
Base Realignment and Closure
Program Management Office West
1455 Frazee Road, Suite 900
San Diego, CA 92108-4310

Subject: Comments on June 22, 2007 Draft Site Management Plan
Naval Station Treasure Island
San Francisco, California

Dear Mr. Sullivan and Mr. Perry:

On behalf of the Treasure Island Development Authority (TIDA), Geomatrix Consultants, Inc. (Geomatrix) has reviewed the June 22, 2007 Draft Site Management Plan, Naval Station Treasure Island, San Francisco, California (Draft SMP). The document is an annual update to a document formerly called Environmental Closeout Strategy/Schedules and it presents a brief summary of environmental conditions and the Navy's anticipated schedule for completing the various environmental programs. This letter presents a specific concern regarding the schedule for the non-time critical removal action for Bigelow and Halyburton Courts in Site 12 and one technical comment.

SCHEDULE FOR NON-TIME CRITICAL REMOVAL ACTION AT BIGELOW AND HALYBURTON COURTS

We note that the schedule for conducting the non-time critical removal action for Bigelow and Halyburton Courts in Site 12 has been pushed back to 2012. Based on information communicated in Base Realignment and Closure (BRAC) Cleanup Team (BCT) meetings, we understand that this work has been delayed due to budget constraints. It is likely that this area will remain fenced and the buildings will remain unoccupied until the removal action is conducted. TIDA has a number of concerns regarding this situation as outlined below.

1. The fenced areas and unoccupied buildings present an ongoing property management liability for TIDA. It is difficult to maintain the fences to ensure that unauthorized entry does not occur. As a result, unoccupied buildings are frequently vandalized and they sometimes attract squatters. This situation is particularly worrisome within an occupied residential area.
2. Delays in completing the removal action will preclude TIDA's ability to lease the existing housing in Bigelow and Halyburton Courts for several years.
3. Delays in completing the removal action could also delay implementation of the redevelopment plans for Treasure Island.



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TIDA believes that this situation is a good example of why an early transfer of the Navy's remaining environmental cleanup obligations would be in the best interests of both the Navy and TIDA.

TECHNICAL COMMENT

The description for Site 24 (Page A-19) notes that former installation restoration (IR) Sites 5 and 17 have been incorporated into Site 24 for further investigation. The text should also discuss past historical use and chemical impacts at these two sites.

We appreciate the opportunity to review the Draft SMP. Feel free to contact me if you have any questions.

Sincerely yours,
GEOMATRIX CONSULTANTS, INC.

Gary R. Foote, P.G. #5044
Principal Geologist

GRF/jd
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Attachments

cc: Mr. Jack Sylvan, TIDA
Ms. Mirian Saez, TIDA
Mr. Henry Wong, Cal EPA Department of Toxic Substances Control
Mr. Christine Katin, U.S. Environmental Protection Agency
Ms. Agnes Farres, Cal EPA Regional Water Quality Control Board