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June 28, 2011

James Sullivan  
Department of the Navy  
BRAC Program Management Office West  
1455 Frazee Road, Suite 900  
San Diego, California 92108-4310

Re: Comments on June 2011 Proposed Plan/Draft Remedial Action Plan (PP/Draft RAP),  
Installation Restoration Site 27 (IR Site 27), Naval Station Treasure Island,  
San Francisco, California

Dear Mr. Sullivan:

On behalf of Treasure Island Enterprises (TIE), Anchor QEA, L.P., respectfully submits the following comments on the subject notice. Our comments on the PP/Draft RAP for IR Site 27 are provided below.

TIE appreciates the Navy's ongoing willingness in attempting to acknowledge future marina development and operation in the plan (e.g., the Feasibility Study). As you know, TIE feels that the current and historic use of the marina, as well as the planned expanded future use of the marina as approved in the Joint Environmental Impact Statement/Environmental Impact Report for the Disposal and Proposed Reuse of Naval Station Treasure Island, is also a location specific Applicable or Relevant and Appropriate Requirement (ARAR). As such, TIE continues to request that the Navy adjust the final design for the remedial action to accommodate the continued operation of the current and historic use of the marina, as well as construction and operation of the marina as planned. Since the reuse plan includes the marina expansion, the needs of the marina expansion must be considered during final design of the remedial action. TIE is concerned that the placement of 1-foot diameter armor stone in the "nearshore band" of IR Site 27 will interfere with maintenance and operation of the

existing marina and preclude (or significantly increase the cost and complexity of) construction of the expanded marina. TIE notes that, based on our analysis, additional dredging to provide adequate constructability of the proposed "cap" when considering base and armor layers, overdepth, etc., is likely required, regardless.

TIE continues to recommend that the final design takes into account the current and future maintenance dredging needs, prop wash and other scouring forces acting on the proposed cap due to current hydrodynamic conditions and operation of both the current/ historic marina and the proposed expanded facility, and the long-term effectiveness of the proposed "cap" in the marina environment. The final remedial design must ensure that the dredging and backfill is compatible with current, historic, and future uses of the marina.

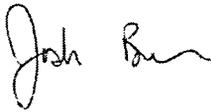
Implementation of Institutional Controls that are designed to protect the "cap" but which diminish the viability of the current/historic marina, and potentially the future marina, would not be acceptable and would not be in compliance with the requirement to consider the expanded marina as part of the site baseline. The long-term effectiveness (e.g., adequacy and reliability of the "cap") is dependent on a meaningful consideration of current, historic, and future site uses, not just controls during construction which are more applicable to short-term effectiveness.

TIE is also concerned that the Navy has made numerous assumptions regarding potential offsite disposal options without initiating realistic measures to develop and analyze the feasibility of these endpoints. Currently, the Navy is intending to dispose of the dredged material from IR Site 27 at an upland landfill location or at a beneficial reuse site. While the Navy does not classify the IR Site 27 material as hazardous waste and has assumed that the dredged material will be acceptable for non-hazardous waste landfill disposal or placement at a beneficial reuse site, the Navy has not, to our knowledge, officially received approval for a given location, and has assumed dewatering would not be required. Based on our observations and studies of sediment at the site, dewatering would be required to transport material to a landfill (the material is extremely fine), and may be too fine for beneficial reuse at Montezuma. Additionally, the Navy would need to coordinate with the San Francisco DMMO on the potential use of the Montezuma Wetlands Upland Disposal Site. The assumptions have a potential significant impact on the Navy's cost analysis.

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TIE appreciates the Navy's offer to include TIE in the final design process to ensure that the needs of the current, historic, and future marina are met. We appreciate the opportunity to review the subject document and look forward to our continuing coordination on this project. Please feel free to contact me if you have any questions at (949) 347-2780 or via email at [jburnam@anchorqea.com](mailto:jburnam@anchorqea.com).

Sincerely,

A handwritten signature in cursive script that reads "Josh Burnam".

Joshua Burnam, MPH, D.Env.  
Anchor QEA, L.P.

Cc: Mr. Randy Short, TIE  
Mr. Jay Wallace, Jay Wallace Associates

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