5/29/07 – 01669

Landin, Paul/VBO

From: Hirsh.Steven@epamail.epa.gov
Sent: Tuesday, May 29, 2007 2:19 PM
To: winoma.johnson@navy.mil
Cc: Francisco, Ben/VBO; ejsalopek@deq.virginia.gov; Rosnick, Holly/WDC; Rosnick, Holly/WDC; jforan1@maine.rr.com; Landin, Paul/VBO
Subject: Bousch Creek EECA Comments

Attachments: EPA_comments_EECA_Bousch Creek.doc

EPA_comments_EE
CA_Bousch Creek...

Hi Winoma,

Attached is a comment memo from BTAG on the "Draft Engineering Evaluation / Cost Analysis (EE/CA) for Upper Reaches of Bousch Creek".
EPA will not have any additional comments on the Draft document.

In the first comment BTAG suggests the use of coarse sand instead of pavers or matting in the channel post excavation.

EPA believes Alternative #3 provides an adequate reduction of risk with minimal loss of aquatic habitat.

Please contact me, or have your eco risk folks contact Bruce Pluta if further discussion is necessary.

Steven Hirsh
US EPA Region III

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(See attached file: EPA_comments_EECA_Bousch Creek.doc)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

May 22, 2007

SUBJECT: Draft Engineering Evaluation / Cost Analysis (EE/CA) for Upper Reaches of Bousch Creek; Naval Station Norfolk; Norfolk, Virginia; April 2007

FROM: Bruce R. Pluta, Coordinator
Biological Technical Assistance Group

TO: Joshua Barber (3HS11)
NPL/BRAC Federal Facilities Branch

In response to your request, representatives of the BTAG have completed the review of the subject document and offer the comments presented below. We appreciate this opportunity to provide input prior to the selection of the final removal alternative.

1. It is unclear why concrete matting or pavers are necessary for the channel following removal of contaminated sediment in Alternative #3. This creek is a low gradient system that should not experience flows or storm surges sufficient to erode the stream bottom. Bousch Creek is likely depositional over most of its length. A much cheaper alternative would be to backfill with course sand which should provide sufficient stability, and is unlikely to be transported during tidal fluctuations. This material would also be easier to use as backfill and provide a good substrate for benthic invertebrates.

2. The implementation of Alternatives #2 or #3 may result in the removal of significant areas of riparian vegetation (trees and shrubs along the bank). Where riparian buffers are disturbed or removed, these areas should be restored following completion of removal activities, including seeding with native riparian species, and planting native trees and shrubs. BTAG can provide a list of appropriate native riparian species.

3. Section 4.1.2 indicates that Alternative #2 will impact "nominal wetlands" and that these wetland impacts would be coordinated appropriately and minimized to the extent practicable. It is assumed that these impacts would also occur for alternative #3. The anticipated impacts should be described, as well as the anticipated mitigation actions.

4. The BTAG recommends the selection of Alternative #2. This alternative would address all areas of ecological risk while eliminating the costs associated with the channel lining proposed in Alternatives #3A or #3B is not necessary and would result in a reduction of available habitat.

Thank you for the opportunity to provide continuing support on this project. Please contact me at x2380 if you have any questions.

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(See attached file: Draft BouschCreekEECA RTCs 06-20-07.pdf)