

Alameda Reuse and Redevelopment Authority

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Governing Body

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Mayor, City of Alameda
City of Alameda

February 1, 2005

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Improvement Commissioner
City of Alameda

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Councilmember/Community
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Dear Thomas:

Doug deHaan
Councilmember/Community
Improvement Commissioner
City of Alameda

This letter provides comments of the Alameda Reuse and Redevelopment Authority (ARRA) to the Navy's November 29, 2004 *Draft Feasibility Study Report, Seaplane Lagoon, Alameda Point, California (Draft SPL FS)*.

1. The Draft *SPL FS* is well written and organized and recognizes the planned reuse of the site as a commercial marina with adjacent open space. However, the alternatives are not analyzed at a sufficient level of detail to determine how the proposed remediation would affect the economic feasibility of a large commercial marina.
2. Soil and debris fills occur along the northern perimeter of the SPL, as is evident in the later aerial photographs in Appendix A. Otherwise, the *Draft SPL FS* contains no discussion of these deposits. This material should be discussed as part of the site history in Section 2.1. Because this material has never been sampled, it should be investigated as part of remedial design. The *Draft SPL FS* should provide suitable remedial alternatives for management of these deposits.
3. The text should acknowledge that activities associated with future marina use would also be dominant processes controlling sediment resuspension in the SPL. (Section 2.2.2, partial paragraph at top of p. 7)
4. Although other valid reasons may exist, "age" is not a good reason not to use data from 1985, 1990, and 1992 field efforts in the FS. (Section 2.3.1, 1st paragraph, last sentence, p. 12)
5. More discussion would be helpful about plans to isolate all potential residual sources of contamination from the lagoon. Sections 2.4.1 and 3.5.1

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state that remediation at SPL will not be undertaken until this has been accomplished. (p. 19, last paragraph of Section 2.4.1; p. 52 last paragraph of Section 3.5.1) Other *Draft SPL FS* sections suggest that this has already occurred. (e.g., Section 4.3.3.2, bottom paragraph on p. 79; Section 5.2.5.4, 7th paragraph, p. 127; Section 5.2.6.4, 7th paragraph, p. 133) Please clarify what additional isolation is planned. Would such isolation activities delay SPL remediation? What is the probable schedule for any such additional isolation activities?

6. The final FS should await incorporation of the results from radionuclides analysis of sediment samples from the BEREC 2002 cores, because remedial costs to manage radionuclides could significantly increase. (Section 2.4.2.1, 8th paragraph, p. 21; Section 5.2.5.4, 6th paragraph; p. 127; Section 5.2.6.4, 6th paragraph, p. 133; Section 5.2.6.4, 11th paragraph, p. 134)
7. Why were PRGs for radionuclides not developed? Without PRGs, the BEREC investigation data cannot be evaluated easily. (Section 2.5.2, 3rd paragraph, p. 24)
8. On Figure 3-2, it is unclear why the remediation footprint boundary immediately south of BEREC16 and BEREC17 is not located farther to the south, perhaps half way between BEREC16 and BEREC4. (Section 3.5.3, 3rd paragraph, p. 55)
9. In Section 4.3.1, the *Draft SPL FS* states “costs can be incurred in the loss of commercial and/or recreational use of restricted areas” These costs appear not to have been included in the cost calculations in Appendix C. These costs cannot be incorporated in cost comparisons among alternatives, if they were ignored in the FS. This issue also arises elsewhere in the FS. (bottom partial paragraph on p. 76; Section 4.3.3.2, 6th paragraph, p. 81; Section 5.2.2.3, 1st full paragraph on p. 116; Section 5.2.3.3, 7th paragraph, p. 119; Section 5.2.4.3, 10th paragraph, p. 123; and Section 5.3.2.7, p. 156)
10. The FS should not assume that the creation of shallow or emergent habitat in the corners of the SPL, because of capping, would be compatible with layout of the future marina’s docks. The sizes of the contaminated areas in the lagoon corners are so large as to probably be an obstacle to optimal marina design. The consequential costs of a scaled-down marina should be included in the alternative’s costs. (Section 5.2.3.1, 5th paragraph, p. 117; Section 5.3.2, top paragraph of p. 152)
11. The FS describes institutional controls (page 118, last paragraph; page 122 third paragraph) in a general way, such as “limit the size of boats”, that is not informative. The City’s proposed marina requires a high percentage (70%) of slips to accommodate boats in the 40 to 60-foot range.
12. If the thickness and top elevation of the Merritt Sand are known, why is its bottom elevation listed “Unknown”? (Tables 2-1 and 2-2, p. 7)

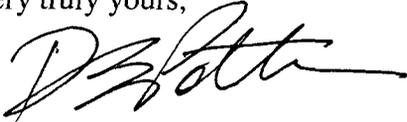
13. According to Figure 2-3, the thickest accumulations of recent sediment are found along the western and eastern sides, not “on the western side and in the northeast corner”. (Section 2.2.3, 3rd paragraph, 5th sentence, p. 7)
14. To which BEREC investigation locations does Table 2-3 refer? In addition, the Void Ratio column on Table 2-3 has a formatting problem. (p. 10)
15. Section 2.2.4 should also discuss whether groundwater elevations are influenced by tidal fluctuations to the east of SPL. (p. 10)
16. Sediment sampling stations SEA11 and SEA12 do not appear on Figure 2-5. (Section 2.3.3, partial paragraph at top of p. 16)
17. Outfall I does not appear on Figure 2-8. (Section 2.4.1, 1st full paragraph on p. 19)
18. The rationale for not evaluating health risks to children needs additional support, perhaps by referencing the RI. For example, it is unclear that the lower fish ingestion rates of children are not offset by their lower body masses. In addition, it is unclear that “fewer consumers in this age group eat local seafood” – fewer than what? (Section 2.5.2, 2nd paragraph, p. 24)
19. It is unclear why the “Controlling ARAR Contaminant Level” for cadmium is 9.3 μL . The National Recommended Water Quality Criterion (criteria continuous concentration) for cadmium is 8.8 μL . Please explain. (Table 3-1, p. 31)
20. The legend entry for the yellow triangle symbol on Figures 3-3, 3-6, and 3-9 through 3-12 is “Maximum Depth Where PCB, DDx, or DDT Exceed PRGs”. This entry is misleading because each of these figures indicates at least one boring at which at least one PRG is exceeded in the deepest sample collected. (p. 58, 61, and 64 through 67)
21. The document “U.S. EPA, 2000” does not appear in the references section. (Section 5.1.1, 5th paragraph, p. 110; and Appendix C throughout)
22. In the northwest corner of SPL, a PRG was exceeded at the deepest sample interval of SP06, in addition to at the locations listed. (Section 5.2.5.1, 3rd paragraph, p. 124; Section 5.2.6.1, 3rd paragraph, p. 130; and Section 5.2.7.1, 2nd paragraph, p. 135)
23. Please clarify whether confirmation sampling would occur throughout the dredged footprint, not just near the sample locations for which a PRG was exceeded at the deepest sample interval. (Section 5.2.5.1, 4th paragraph, p. 124; Section 5.2.5.2, 2nd paragraph, p. 125; Section 5.2.6.1, 4th paragraph, p. 130)
24. Why would additional dredging to address contamination detected through confirmation sampling not exceed two additional dredge passes for focused dredging (Alternative 6)? No such limitation is stated for fixed-depth dredging (Alternative 5). Elsewhere the *Draft*

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SPL FS states that no residual contamination would be left in SPL above PRGs. (Section 5.3.3.3, 1st paragraph, p. 168; Section 5.3.4, 5th full paragraph of p. 180; Section 5.3.4.3, 1st paragraph, p. 182)

If you have any questions or need additional information, please call me or Dr. Peter Russell, ARRA's environmental consultant, at (415)492-0540.

Very truly yours,



Debbie Potter
Base Reuse and Redevelopment Manager

cc: Elizabeth Johnson, City of Alameda
Peter Russell, PhD
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