



July 27, 2006

Mr. Thomas L. Macchiarella
BRAC Environmental Coordinator
Navy BRAC Program Management Office
1455 Frazee Road, Suite 900
San Diego, CA 92108-4310

Re: Comments on May 15, 2006 *Draft Proposed Plan for IR Site 1, 1943-1956 Disposal Area, Former NAS Alameda*

Thomas
Dear Mr. Macchiarella:

Thank you for the opportunity to comment on the Navy's May 15, 2006 *Draft Proposed Plan for IR Site 1, 1943-1956 Disposal Area, Former NAS Alameda (PP)*. Although the original comment period for this draft document has passed, the Alameda Reuse and Redevelopment Authority (ARRA) understands that the Navy has yet to finalize the *PP* due to its continuing discussions with environmental regulators. The ARRA offers the following comments.

GENERAL COMMENTS

1. The *PP* should disclose that the Navy has not conducted sampling and analysis to characterize subsurface soil in IR Site 1, including the landfill contents. The Navy's IR Site 1 investigation strategy contrasts with its approach in other IR Site remedial investigations at Alameda Point. Without such disclosure, the public likely will assume the Navy has formulated and selected the remedial alternatives based on thorough knowledge of subsurface conditions. Public comments might urge a more conservative remedial alternative for Area 1 (the landfill proper), if the public were aware of the uncertainty surrounding subsurface conditions.

In contrast, the lack of subsurface characterization deprives decisionmakers and public commenters of a basis for deciding whether subsurface remediation, including institutional controls, is appropriate in areas other than Area 1. Currently, there is no documentation of

subsurface soil contamination in these areas. None of the soil samples from deeper than two feet bgs (below ground surface) in IR Site 1 (other than in Area 1) exceed any USEPA PRGs (Preliminary Remediation Goals). Potentially overly protective institutional controls should not be a substitute for a thorough remedial investigation. Remedial Alternatives S2-3 (a preferred alternative), S2-4, S3-4 (a preferred alternative), S5-4 (a preferred alternative), S5-5, and S5-6 are examples of this issue. These alternatives generally require institutional controls restricting contact with subsurface soils, even after the Navy remediates the surface soil, despite the absence of documentation that subsurface soils are contaminated. Imposing the burden of institution controls on land that does not require remediation would not be a cost-effective remedy.

2. The *PP* should more accurately state the implications of IR Site 1's Tidelands Trust status. IR Site 1 is entirely within the Tidelands Trust, which is administered by the State Lands Commission (SLC). Tidelands Trust status restricts land uses to those that are water-related—for example, water-related commerce, navigation, fishing, habitat conservation, bathing, swimming, boating, general recreational purposes, and visitor-serving facilities, such as restaurants, hotels, shops, and parking areas. The SLC requires remediation of IR Site 1 to support Tidelands Trust uses. The SLC likely will look to the DTSC for guidance about whether the level of remediation at IR Site 1, including institutional controls, is appropriate for such uses.
3. As stated in ARRA's comments on earlier IR Site 1 documents, the ARRA believes the Navy should install an engineered cap, rather than a soil cover, over the landfilled waste. This conclusion derives from the uncertainty that a soil cover will be effective into the future, coupled with the severe disruption of golf course operations that would occur if the Navy installs an engineered cap due to remedy failure after Alameda builds the golf course.

SPECIFIC COMMENTS

1. Remedial Investigation and Prior Feasibility Studies and Removal Action Summary (p. 3) The text should disclose that the Navy has not characterized subsurface conditions in the landfill footprint through

sampling and analysis, except for Area 1b. The Navy has collected and analyzed eight soil samples from Area 3 from below 2 feet bgs and three soil samples from Area 5. Although the Navy analyzed these samples for a wide suite of analytes, none of the results exceeds the USEPA PRGs. No soil samples from deeper than 2 feet bgs were analyzed from Areas 2 or 4.

2. Remedial Action Objectives (p. 6, left column, middle) The text states: "IR Site 1 is within the boundary of the public trust land at Alameda Point, which may not be used for general purpose industrial, retail, or commercial space; offices; or housing." It is ambiguous whether "general purpose" refers to retail and commercial space as well as industrial space. Further, offices would be an allowed use, provided they support water-related activities. A more accurate wording of this sentence would be "IR Site 1 is within the boundary of the public trust land at Alameda Point, which must be used for activities that are water-related—for example, water-related commerce, navigation, fishing, habitat conservation, bathing, swimming, boating, general recreational purposes, and visitor-serving facilities, such as restaurants, hotels, shops, and parking areas." (changed portions are emphasized)

3. Preferred Alternatives, Alternative S1-4a for Soil Area 1 (p. 15, right column, middle). The text should not overstate the certainty of long-term effectiveness of this remedial alternative for Area 1 (the landfill proper). The text states the following is a key point upon which the Navy bases its preference for this alternative: "Permanently removes some contamination and prevents further migration of remaining contamination." Because the Navy has not characterized subsurface conditions in Area 1a, it is uncertain that the remaining wastes, which may include buried drums, will not migrate in the future. A more accurate way of formulating this sentence might be: "Permanently removes some contamination and helps prevent further migration of remaining contamination." (changed portion is emphasized)

Thank you for considering the ARRA's comments. If you have any questions or need additional information, please contact me or Peter Russell at (415) 492-0540.

Sincerely,



Debbie Potter

Base Reuse and Community Development Manager

Mr. Thomas L. Macchiarella

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cc: Mark Ripperda, USEPA
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