AGENDA

Special Meeting of the Governing Body of the Alameda Reuse and Redevelopment Authority

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Alameda City Hall
Council Chamber, Room 390
2263 Santa Clara Avenue
Alameda, CA 94501

Wednesday, September 10, 2008
Meeting will begin at 7:00 p.m.

1. ROLL CALL

2. CONSENT CALENDAR

Consent Calendar items are considered routine and will be enacted, approved or adopted by one motion unless a request for removal for discussion or explanation is received from the Board or a member of the public.

2-A. Approve the minutes of the Special Joint Meeting of the City Council, ARRA, and CIC of August 19, 2008.

3. REGULAR AGENDA ITEMS

3-A. Authorize PM Realty Group to Enter into a Contract with St. Francis Electric for Pier 2 Electrical Upgrades at Alameda Point for a contract not to exceed $1,344,744.

3-B. Alameda Point Update – Presentation of the Draft Development Concept.

4. ORAL REPORTS

4-A. Oral report from Member Matarrese, Restoration Advisory Board (RAB) representative.
- RAB Comment Letter Regarding Installation Remediation Site 1

5. ORAL COMMUNICATIONS, NON-AGENDA (PUBLIC COMMENT)
(Any person may address the governing body in regard to any matter over which the governing body has jurisdiction that is not on the agenda.)

6. COMMUNICATIONS FROM THE GOVERNING BODY

7. ADJOURNMENT

This meeting will be cablecast live on channel 15.

Notes:

- Sign language interpreters will be available on request. Please contact the ARRA Secretary at 749-5800 at least 72 hours before the meeting to request an interpreter.
- Accessible seating for persons with disabilities (including those using wheelchairs) is available.
- Minutes of the meeting are available in enlarged print.
- Audio tapes of the meeting are available for review at the ARRA offices upon request.

UNAPPROVED
MINUTES OF THE SPECIAL JOINT MEETING OF THE CITY COUNCIL, ALAMEDA REUSE AND REDEVELOPMENT AUTHORITY (ARRA) AND COMMUNITY IMPROVEMENT COMMISSION (CIC)

Tuesday, August 19, 2008

2-A

The meeting convened at 8:01 p.m. with Chair Johnson presiding.

1. ROLL CALL

Present: Chair Beverly Johnson
Boardmember Doug deHaan
Boardmember Frank Matarrese
Boardmember Marie Gilmore
Vice Chair Lena Tam

2. CONSENT CALENDAR

2-A. Approve the minutes of the Special Meeting of July 1, 2008 and the Special Joint City Council and Community Improvement Commission Meeting held on August 5, 2008.

2-B. Authorize Negotiation and Execution of a Sublease for RockWall Wine Company, Inc. at Alameda Point.

2-C. Authorize Negotiation and Execution of a Sublease for Auctions by the Bay, Inc. at Alameda Point.

2-D. Authorize the Executive Director to Enter a Contract, through PM Realty Group, with General Construction Company to Dredge the Alameda Point Channel and Turning Basin in an Amount Not to Exceed $2,586,675.

Approval of the Consent Calendar was motioned by Member Tam, seconded by Member deHaan and passed by the following voice votes: Ayes: 5, Noes: 0, Abstentions: 0. Member Gilmore abstained from approving the minutes of the Special Joint City Council and Community Improvement Commission Meeting held on August 5, 2008.

3. REGULAR AGENDA ITEMS

3-A. Recommendation to concur with the Non-Binding Summary of Terms and Conditions for a transfer of the Exclusive Negotiation Agreement with SCC Alameda Point LLC to a New Entity with D.E. Shaw or transfer of an Ownership Interest in the SCC Alameda Point LLC to D.E. Shaw; and

Recommendation to authorize the City Manager/Executive Director to negotiate a Second Amendment to the Exclusive Negotiation Agreement with SCC Alameda Point LLC.

Debbie Potter, Base Reuse and Community Development Manager, discussed Suncal's request for authorization to secure a financial partner to complete it's obligations under the ENA. Approval to secure a financial partner is in Alameda's sole discretion, and authorization must be granted by the CC, ARRA, and CIC. This request was originally scheduled for consideration in June. At that time, staff had prepared a report that identified a number of key provisions that should be part of any partnership agreement, including that SunCal should retain day-to-day

management responsibilities, continue to have equity stake in the project, and no removal of SunCal as a partner except for cause; and that there should be a commitment of funds sufficient to fund the ENA obligations and activities. Another key provision is that SunCal , as master developer and managing investor, should retain key decision-making authority. Lastly, there is a key provision prohibiting cross-collateralization and cross-default, essentially protecting Alameda Point from being put at risk based on the activity or performance of other SunCal properties.

The executed term sheet between SunCal and D.E. Shaw provides for some, but not all, of core provisions: D.E. Shaw cannot remove Suncal as the managing investor for one year, SunCal must maintain a $1.5 million stake in the pooled fund, and D.E. Shaw expects to invest $10 million in the ENA entitlement process. However, D.E. Shaw remains the ultimate decision-maker over the project budget, business plan and other major decisions. In addition, SunCal can be removed for cause or no cause after one year as the term sheet is presently drafted. Given the changed nature of the project and that the term sheet does not include all core provisions, staff recommends that Alameda consider directing the City Manager to negotiate a second amendment to the ENA that would allow us to manage some of the risk the City might be exposed to by our inability to retain some of these core provisions in the term sheet. Amending the ENA in several areas should include: requiring that the completion of the conveyance term sheet with the Navy, that is now part of special legislation, be a mandatory milestone; and secondly, that we tighten up and revise some of the timeframes that are currently contained in the ENA that don't reflect the project going to a ballot, most likely in the land plan that SunCal's pursuing, and that we look at an outside expiration date of the term sheet so that we have an ability to evaluate where we are one year from now and see how the project has changed and the progress that has been made. The recommendation is that Alameda concur with the provisions of the term sheet and that the operating agreement come back to the City, ARRA, and CIC in closed session for final approval of the assignment and transfer, and that the ENA be amended and returned to the ARRA Board at the same time for approval.

There were several speakers including Michael Kruger, who spoke in support of SunCal and its aggressive plans to address the climate protection issues. Richard Banger spoke about his main concern regarding the 2nd amendment and the decision making powers of D.E. Shaw. He stated the importance of, once a 2nd amendment is drafted, that a well-publicized community meeting take place for the public to offer comments. Helen Sause, of HOMES executive board, spoke on behalf of SunCal, urging the City to make it possible for them to continue their work and expressed HOMES support of SunCal, stating that the City is best serviced if the Navy doesn't auction the land. Doug Biggs of APC also supports the efforts of SunCal, expressing how very innovative, engaging and open they are when negotiating with APC. Elizabeth Krase asked why the term sheet is not public record, and expressed concerns regarding the possibility of the construction of buildings 12 to 20 stories high (as discussed at the Aug. 7th Community Workshop on the USS Hornet) and that there was no solution for transportation or traffic discussed and it is not realistic.

Chair Johnson thanked the speakers and clarified that the Alameda Point redevelopment Project, itself, was not before the ARRA tonight, and that the request by SunCal for authorization to secure a financial partner was the item before the Board.

Vice Chair Tam asked the City Attorney or staff to respond to Ms. Krase question regarding the term sheet being public. Terri Highsmith, City Attorney, explained that the term sheet is a confidential real property document. It is not finalized and still being negotiated, so it is appropriate to be viewed in closed session. Once the project is completed and every action has been taken to finalize it, any real property document discussed in closed session will become public record.

Vice Chair Tam continued to discuss assurance that Suncal and D.E. Shaw are committed to each other with regard to the ENA and would like to see the agreement reflected in the ENA with regard to the financial plan. Chair Tam described an analogy about finding a different mortgage company to re-finance your home, that they are looking at the fine print. She supports directing staff to ensure the ENA reflects the commitment to have SunCal as master developer and that the timeline comports with timelines that are expected.

Member deHaan was concerned and asked whether SunCal would be willing to continue, or had a fall-back plan, in the event a non-Measure A compliant plan did not pass. Pat Keliher, SunCal's Alameda Point Project manager, replied that indeed they have a fall-back plan and have discussed Measure A compliant plans internally. He stressed that SunCal would not just walk away from the project and would continue in the process for the long term

Member Gilmore thanked SunCal and D.E. Shaw for their transparency and honesty with their public presentations and comments to the Board in closed session. She expressed that the Board will be looking very closely at the operating agreement. Maintaining Suncal as the master developer during the ENA process is important because that is the expectation of the community, and that SunCal remain the master developer until it is mutually decided the project doesn't work or is not feasible. We made a commitment to SunCal, not to a third party. Member Gilmore stated that SunCal has been straightforward and that the desire is to move forward together with the appropriate protection in place for the community.

Member Matarrese discussed bringing the ENA back to the Board, as its purpose is to drive us to a Development Agreement. He stressed that the 2nd amendment to the ENA should include provisions that protect the city. He motioned for the following amendments: 1) that we can terminate the ENA for reasons other than for cause, either illegal activity or other malfeasance; 2) the timeline should be capped to remove the current flexibility which was termed as an "automatic extension" and should be adjusted to meet current progress; and 3) insulate Alameda Point from cross-default. The 2nd amendment should be brought back to the ARRA for review with the public and then finalization.

Member deHaan asked for clarification on the relationship between D.E. Shaw and Lehman Brothers. Debbie Potter explained that SunCal had anticipated they would self-finance, but had initially identified Lehman Bros. as a possible financial partner. SunCal will continue to self – fund until Alameda approves the operating agreement and 2nd amendment to the ENA. Member deHaan wanted to know where D.E. Shaw was receiving its funds. Ms. Potter explained that D.E. Shaw is a typical hedge fund with various investors and $40–$50 billion in funds available. David Brandt, Deputy Executive Director, further explained that D.E. Shaw is a privately held hedge fund, and that the identities of their investors is confidential, we know the volumes, but we don't know individual investors.

Member Gilmore expressed a main concern about cross default, urging that we make sure that in the event something was to happen to another of Suncal's project, the ripple effect stops before it reaches Alameda.

Member Matarrese summarized and reiterated his motion stated earlier. Member Tam seconded the motion and it was passed by the following voice votes: Ayes – 5, Noes – 0, Abstentions – 0.

3-B. Oral report from Member Matarrese, Restoration Advisory Board (RAB) representative.

Member Matarrese did not attend the RAB meeting, as it conflicted with the Community Meeting, which he attended. He made one comment regarding an 8/13 front-page Chronicle article about the US Army giving the Fort Ord reuse authority 3300 acres and providing $100 million for remediation. He asked if this was true. David Brandt affirmed it is true. Member Matarrese stated that we should talk to our elected officials on federal level and ask them why we can't get far less acreage and the money for clean-up. Chair Johnson questioned whether $100 million was enough for the clean up. Mr. Brandt responded that the Environmental Protection Agency (EPA) and the Department of Toxic Substances Control (DTSC) believe that it is sufficient, and that the Army is still liable for that waste. Member deHaan confirmed that once that land is transferred to the Fort Ord reuse – it was their plan to be dissolved. Chair Johnson discussed that this privatized clean up was what the Navy had proposed at one point, except that we're paying for it, and that the Army operates differently than Navy.

7. ADJOURNMENT

Meeting was adjourned at 8:43 p.m. by Chair Johnson.

Respectfully submitted,

Irma Glidden

Irma Glidden
ARRA Secretary

Alameda Reuse and Redevelopment Authority
Interoffice Memorandum

3-A

September 10, 2008

TO: Honorable Chair and Members of the Alameda Reuse and Redevelopment Authority

FROM: Debra Kurita, Executive Director

SUBJ: Authorize PM Realty Group to Enter into a Contract with St. Francis Electric for Pier 2 Electrical Upgrades at Alameda Point for a Contract Not to Exceed $1,344,744

BACKGROUND

In April 2006, the Alameda Reuse and Redevelopment Authority (ARRA) approved a 20-year sublease with the Maritime Administration (MARAD). As part of the technical requirements in support of the lease, the ARRA is obligated to deliver reliable electrical service to the ships. The electrical system on pier 2 is old, unreliable and does not comply with the current standard provided throughout Alameda. In January 2007, the ARRA approved the design work for the electrical upgrade project in order to be ready to proceed once the Alameda Power and Telecom-supplied transformers arrived. In July 2007, staff brought the $1.7 million project to the ARRA Governing Board for approval. The ARRA directed staff to revise the project in order to reduce the total costs.

DISCUSSION

Staff worked closely with Alameda Power and Telecom (AP&T) to understand the condition of the pier electrical system to determine if the existing system could be maintained for the remainder of the lease or if there were other strategies that could be implemented to provide power and reduce the project cost. AP&T confirmed that the system needed to be upgraded and moved above ground to prevent water infiltration. However, AP&T also informed staff that market changes had recently resulted in a lower cost for a similar AP&T project and suggested that ARRA re-bid the project to see if the cost could be lowered through that process.

The project was re-bid and advertised in the Alameda Journal for two weeks. Four companies attended the bidders conference, and three bids were received:

Clyde G. Steagall, Inc.	$1,290,131
St. Francis Electric	$1,278,760
Edward W. Scott Electric	$1,590,000

With 5% contingency, and an add-on alternate for concrete x-ray, and an independent testing agency for structural scope, the contract amount is not to exceed $1,344,774. The new project cost is approximately $400,000 less than the original cost. The project construction period is estimated at 200 days.

BUDGET CONSIDERATION/FINANCIAL IMPACT

The FY2008-09 approved ARRA budget included $1,700,000 for the Pier 2 electrical upgrade. There is no impact to the General Fund.

RECOMMENDATION

Authorize PM Realty Group to enter into a contract with St. Francis Electric for Pier 2 electrical upgrades at Alameda Point for a contract not to exceed $1,344,774.

Respectfully submitted,

Leslie Little
Development Services Director

By: Nanette Banks
Finance & Administration Manager

City of Alameda
Alameda Reuse and Redevelopment Authority

3-B

September 10, 2008

TO: Honorable Chair and Members of the
Alameda Reuse and Redevelopment Authority

FROM: Debra Kurita
Executive Director

RE: Alameda Point Update – Presentation of the Draft Development Concept

BACKGROUND

On July 18, 2007, the Alameda Reuse and Redevelopment Authority (ARRA), Community Improvement Commission (CIC) and City Council approved an Exclusive Negotiation Agreement (ENA) with SunCal Alameda Point LLC (SunCal) for the redevelopment of Alameda Point. The 24-month ENA established key performance milestones, provided for reimbursement of ARRA staff and third party costs, identified activities to be completed by third party entities, and specified key personnel assigned to the project.

The ENA was amended in March 2008 to provide more time to complete two tasks: preparation of the Development Concept and related documents, and preparation of the draft master plan. In addition, SunCal was required to deposit $350,000 a quarter, and spend $117,000 a month, for consultant costs to ensure progress on developing the required documents.

The Development Concept and related documents, including a business plan, infrastructure plan, draft update of the Sports Complex Master Plan, and draft project pro forma, are due on September 19. The draft master plan is due on November 19, 2008. SunCal will present the draft Development Concept to the ARRA Board on September 10.

DISCUSSION

During the initial 14-month term of the ENA, SunCal has held four community meetings and conducted numerous meetings with stakeholders ranging from the Alameda Point Collaborative and business owners located at Alameda Point to members of the Alameda Architectural Preservation Society and Friends of the Alameda Wildlife Refuge. SunCal has made presentations to a variety of community organizations including the Chamber of Commerce and Rotary.

SunCal has also continued its due diligence work to better understand and plan for all the site's constraints and challenges. This due diligence work includes meeting with environmental regulators, the United States Fish and Wildlife Service, the United States Veterans' Affairs

Department, and the United States Navy as well as continuing to work with its consultants on traffic and transportation issues, geotechnical and civil engineering challenges, and historic preservation and land planning concerns. These efforts will culminate with a Development Concept and the related documents to be submitted to the City on September 19.

The process began with a community meeting in October 2007 that introduced SunCal to the community and presented the key site constraints. At a meeting in December 2007, SunCal presented two land plans to the community. Based on feedback received at that meeting, SunCal held a community meeting in early August 2008 to present its draft land plan for Alameda Point. At a City-sponsored Alameda Point Task Force meeting on August 27, SunCal presented its revised land plan, and members of the Task Force and the public had an opportunity to comment on the plan. Written comments received after the August 27 meeting are attached to this staff report. The September 10 presentation to the ARRA Board is another opportunity for the public, as well as the ARRA Board, to comment on the plan prior to SunCal finalizing the Development Concept.

Following submittal of the Development Concept, SunCal anticipates holding several community meetings on specific topics including historic preservation. These more focused meetings will help SunCal continue to refine its Development Concept and transition it to the required draft master plan due on November 19. In addition, staff will distribute the Development Concept to City Boards and Commissions with a request that they review and comment on the Development Concept prior to the November 19 due date for the draft master plan.

BUDGET CONSIDERATION/FINANCIAL IMPACT

This staff report is for information only and no action is required. Therefore, there is no financial impact on the ARRA and General Fund budgets.

RECOMMENDATION

Receive public comment and provide feedback on SunCal's draft Development Concept.

Respectfully submitted,

Leslie Little
Development Services Director

By: Debbie Potter
Base Reuse and Community Development Manager

Attachments:

1. Comments from AP Task Force meeting, submitted by John Knox White
2. Letter from Joan Konrad
3. Letter from David Howard

The Alameda Point Task Force meeting was held Wednesday night, 8/27 and was organized in a way that allowed for rambling comments to dominate the meeting, which lead to a number of community members being unable to give their input and a reduction of the agendized "Task Force Discussion" from 30 minutes to about 8.

With this reduced time, I found myself spouting quick comments that didn't require explanation and therefore, I am choosing to pass on those comments here. These are all based on the notes I took during the meetings discussion.

There was a lot of discussion about Suburban vs. Urban development representing a good swath of views. Clearly some portion of Alameda residents consider Alameda a suburb, and therefore recoil at the idea that suburbs might not be the highest planning use. But Alameda, both historically and currently, is not truly suburban anymore than Berkeley or Albany are. The discussion of Suburban Growth vs. Urban Growth should be clear in this distinction. Alameda is a city of 75,000 people and it is this fact that gives it its small town feel. Nobody brags about about Small Suburban feel, because there's a difference.

In the end, the development of Alameda Point sits in the middle of two areas of influence the city of Alameda and the Bay Area region. And we should be working to meet our obligations for both. Whatever is developed at Alameda Point must have benefits for existing residents. But also, we can't pretend that we don't live in a larger area and that our decisions have zero effect on regional growth patterns. To become myopic is to continue a problem with sprawl that has been occurring and speeding up for 50 years.

Crime came up twice during the discussion, loosely defined and never attributed, the intimation was that building 5 story condos with stores in them will bring crime (and in the end hurt property values). But the data on this assertion doesn't back it up. Reviews of the FBI's crime data show no relationship between density and crime, and in fact that surburban building patterns tend to have higher crime rates than more dense urban areas with their street activity and eyes on the street.

Historic Preservation was a theme from a couple of speakers. However it's time for the discussion to move beyond "Save every building plus a couple of others" and on to a discussion of what Alameda Point is going to be and how historical preservation can enhance it. I am concerned, as one of the speakers Wednesday night mentioned, that the current discussion focuses too much on maintaining a military base, rather than a vibrant neighborhood that reflects its past. We need to decide, and I'd suggest that never 15 years of public process already has, whether we want to create a WWII "Historic Williamsburg" without the reenactors, something that could very well become a big drag on city finances and is probably financially infeasible due to the infrastructure and clean-up costs. Or are we aiming to create a neighborhood that reflects and complements our existing city with it's mix of historical and new buildings and that contributes to the both the financial, the amnenities and the character of our city.

If there was one dissappointment in the discussion on Wednesday, and one that should have been addressed during the meeting was the thrice mentioned idea that "the

developer" was disrespecting the community by not bringing forth a measure A compliant plan. This was spoken, at a meeting with 15 speakers, by folks who were apparently not at the first SunCal/Alameda Point meeting where such a plan was presented and overwhelmingly rejected. Results that mirror the conversations at APCP's meetings on Alameda Point as well. I'm not suggesting that bringing up Measure A Compliancy should be off the table, but the disrespectful manner in which some community members presented the issue was disappointing at best. And I want to acknowledge for the sake of clarity that one speaker raised her concerns about the issue while avoiding the "evil developer" speak, it clearly is something that the community should continue to discuss civilly.

Lastly, I think there needs to be a recognition of all the planning that has gone into this process, from the BRAC onward, and that through this public process we have finally arrived at two proposals that meet the goals of the General Plan Amendment for Alameda Point, itself a document nearly a decade in the making. The community has seen two different PDC/Measure A compliant plans and in both of them they have made their displeasure known (not that they are not dense, but that the design of these plans does not reflect the principles that the community has outlined as important).

It's easy to take plans and start tweaking them to meet the specific desires of each small group, but at the end, we need to be careful that we don't end up with plans that pay homage to our guiding principles while actively working against those very same principles. One speaker said on Wednesday, "what happens if we do it wrong." And that's always something to be midful of, however, we also can't bury our heads in the sand and hope that by doing nothing, or by following 50 years of failing land-use planning that have brought us higher transportation cost, more congestion, less farmland and open space and a strained public infratructure, just because we might not do everything perfectly. We have to be careful not to allow our real, and understandable concerns, to force us into bad decisions. Doing nothing, or doing "the same" which in the past 30 years has brought more traffic, not less, shouldn't be our map forward.

Lastly, I wanted to say again that while I made comments at the meeting about parts of the project I'd like to see reexamined, and I'm not suggesting that the plan is 100% perfect, SunCal has adapted their plans to what the community has said after every meeting and Wednesday night was no different. After two years of planning with our past developer and watching plans come forth that did not reflect many of the comments from the meeting before, I think it should at least be recognized that Peter Calthorpe and SunCal are at least responding.

Respectfully submitted as comments from the task force meeting,

John Knox White

ATTACHMENT 2

Joan Konrad
42 Invincible Court
Alameda, California 94501
510-522-3789
E-mail: joankonrad@comcast.net

August 28, 2008

SunCal
909 Marina Village Parkway
Alameda, CA 94501-9928

Subject: Concerns about Alameda Point Proposed Plan

Gentlemen:

Your proposed goals for plan B, to have a mixed use, sustainable development focused on walking and public transit are commendable. As the plan was presented on August 7, I have concerns about it achieving those goals in a manner consistent with the City's General Plan. The City of Alameda General Plan, Chapter 9 puts forth seven challenges and issues considered necessary for successful redevelopment of Alameda Point. Will your plan meet these challenges?

1. *Seamless integration of Alameda Point with the rest of the City* - How will the seamless integrate be accomplished? The plan seems not to address this issue. How will the relationship with the Estuary and businesses at the northeast section be handled? Will the cyclone fence along Main Street be removed? Will the entrance gate structure at the end of Ralph Appezatto Memorial Parkway be retained? How will connections at Tinker Avenue, Ralph Appezatto Memorial Parkway and Pacific Avenue address the integration? One thought, a neighborhood retail node at Market Street and Tinker Avenue would permit an interaction of Alameda Point and Bay Port neighborhoods.

2. *Fostering a vibrant new neighborhood* - The General Plan wants ". . . to create new and energetic areas, encompassing a variety of uses." Even though the plan presented was preliminary, it seemed to lack the texture necessary for vibrant neighborhoods. The uses seemed too segregated to be considered mixed use. The layout of the neighborhoods seemed to lack the elements necessary to promote human interaction. Will the pedestrian environment be sufficiently pleasing and distances sufficiently short to encourage walking?

   Will building street fronts in the denser areas be too massive to create a scale compatible with the character of Alameda? I hope the building to street ratio such as is in the live/work neighborhood east of Jack London Square and the canyon like walls of the condominium buildings along Bay Street in Emeryville are not the types of streetscapes being considered.

3. *Maximizing waterfront accessibility* – Thought seems to have been given to access around the seaplane lagoon. I hope thought about access to the Estuary will also be seriously considered.

4. *De-emphasizing the automobile and making new development compatible with transportation capacity* – The plan B focuses on public transit. I hope future plans will incorporate the necessary pedestrian and bike circulation into the transportation plan.

   Also, to be successful, the transit plan needs to incorporate the whole island. I hope this is your intent. The elevated individual car transit system was fascinating, but such elevation isolates neighborhoods rather than brings them together. I wonder if it is appropriate for Alameda Point.

5. *Ensuring economic development* - Will effort be made to achieve a job/housing balance for the people living in the proposed range of housing types? Will densities be sufficient to make retail successful?

6. *Creating a mixed-use environment* – Will there be accommodations for a variety of uses – community support services, cultural, religious, civic and recreational within walking distances?

7. *Establish neighborhood centers* - The *NAS Alameda Community Reuse Plan* calls for three neighborhood centers, in the Civic Core, in the Main Street Neighborhood west of Main Street and in the Inner Harbor. I believe these centers were proposed with the idea of a high proportion of people being within ¼ mile of destinations, such as walking children to daycare, walking and biking to schools, shopping.

I hope you plan to adjust the development plans to address the conditions of the toxic cleanup. For instance, the Navy is proposing to put a 4 foot layer of soil to cover the contaminated soil at the northwest corner, which is part of the proposed golf course. It probably would be impossible to turn that area into wetlands without running into uncharacterized industrial waste. Some in the City had proposed removing the contaminated soil and replacing it with good soil, but apparently that is now unlikely.

Alameda Point is such a remarkable location. I wish you every success in tackling the complexities in developing this site. We in Alameda will certainly be the winners if you are successful.

Sincerely yours,

Joan Konrad
Copies: Frank Matarrese, Ann Cook, George Humphreys, Andrew Thomas

ATTACHMENT 3

David Howard
928 Taylor Ave
Alameda, CA 94501

City of Alameda
2263 Santa Clara Ave
Alameda, CA 94501
Attn: Alameda Point Task Force

Re: Objection to SunCal's proposals for Alameda Point

I am dissatisfied with, and stand in opposition to SunCal's proposal to build 6000 housing units at Alameda Point. Such a proposal would bring from 14,000 to 15,000 people to Alameda Point, at densities roughly twice that of the rest of Alameda, and at a density that closely approaches San Francisco. If SunCal has lower-density Measure A compliant proposals as they asserted before City Council earlier this month, they should bring them forward.

Geography	Population	Housing units	Area in square miles; Total area	Area in square miles; Water area	Area in square miles; Land area	Density per square mile of land area; Population	Density per square mile of land area; Housing units
Alameda city, Alameda County	72,259	31,644	22.97	12.17	10.8	6,693	2,931
San Francisco city, San Francisco County	776,733	346,527	231.92	185.22	46.69	16,634	7,421
Alameda Point - SunCal Proposal (770 acres)	14,280	6,000	1.20	0	1.20	11,869	4,987

I moved my family to Alameda to enjoy the benefits of a low to medium-density suburban community – safe neighborhoods, plenty of parks and open space and minimal congestion of people and automobiles. This is a perfectly legitimate way of life – one which many people in this country choose.

SunCal's proposals take Alameda in the direction of a high-density, congested urban center, something not in keeping with Alameda. SunCal's architect, Peter Calthorpe is known for his dislike of suburbia and his concomittant war on the automobile, even despite the advent of high-mileage low-emission hybrid automobiles and electric cars. Not everyone wants to, nor should be forced to live in a high-density urban environment.

I've also done some research on the pie-in-the-sky proposal for a personal rapid transit system for Alameda. Not one PRT system exists in production today to serve a community – save for the Morgantown Virginia system built over 30 years ago and which is widely considered not a true PRT system. PRT sounds like more false promises from a developer about mass transit solving congestion that they create with their development.

Thank you,

David Howard

Item 4-A

George B. Humphreys
25 Captains Drive
Alameda, CA 94502-6417
August 22, 2008

Mr. George Patrick Brooks,
Base Environmental Coordinator
Base Realignment and Closure
Program Management Office West
1455 Frazee Road, Suite 900
San Diego, CA 92108-4310

Subject: Installation Restoration Site 1: Analysis of Trenching Study and Deficiencies in Proposed Plan

Dear Mr. Brooks:

This will confirm that the above two documents were hand delivered to you at the August 14, 2008 meeting of the Restoration Advisory Board (RAB) at City Hall West in Alameda, California.

The undersigned members of the RAB have reviewed and concur with the information provided and the views set forth in those documents. We urge you to take immediate action to correct the deficiencies in the proposed plan. It is unacceptable that this site has for decades been releasing contaminants into the waters of the Bay, apparently with the acquiescence of the regulatory agencies. The proposed plan, if implemented, would leave uncharacterized industrial-type wastes in a condition vulnerable to future releases by seismic damage, shoreline erosion, site inundation and incursion by burrowing animals.

Sincerely,

George B Humphreys

George B. Humphreys, P. E.
Community Co-chair, Restoration Advisory Board

James D. Leach

Copies to: Anna-Marie Cook; EPA, John West, RWQCB; Dot Lofstrom, DTSC; Dr. Peter Russell, Frank Matarrese w/a; Wayne Nastri, EPA w/a; Charles Ridenhour, DTSC w/a; Marc Albert, Alameda Sun w/a; Community RAB members

Analysis of Trenching Report

Exploratory trenches were excavated within the waste cell area (Area 1a) of Site1. The stated objectives of the trenching were to:

a. Verify waste volume estimates.
b. Confirm the absence of intact drums

The final report[1] on the exploratory trenching was issued on May 16, 2008. The findings were as follows:

a. The total waste volume within the cells could be between 94,000 and 133,000 cubic yards (cy). This corresponds to a tonnage range of from 141,000 to 200,000 tons. This can be compared to a range of between 15,000 and 200,000 tons used in the Feasibility Study Report[2] .
b. No intact drums were found.
c. Although approximately 25 % of the waste volume had radiation levels above the Navy's criterion for removal (6,000 counts per minute), the study states "…. It should not be inferred that the distribution of radiological contamination in the excavations is consistent throughout the volume that was radiologically impacted, nor should it be inferred that this distribution would be consistent throughout the site". (Emphasis added)

It is also noteworthy that little or no evidence of municipal (household) wastes was found, only construction debris (concrete, bricks, pipes, glass, and wood) interspersed in the soil. This may account for the statement by Mr. Pat Brooks, the Navy's Base Environmental Coordinator, during the aborted tour of Site 1, that a lot of municipal wastes were excavated from Site 1 before construction of the runway. He said that he thinks the wastes went to Site 2. This raises questions about where the wastes from Site 1 were deposited in Site 2 and how municipal wastes could have been transferred without taking along interspersed toxics and radiological contamination. If the Navy excavated a substantial volume of wastes from Site1, and the Navy can document where this occurred (e.g. under the runway), then the cost of excavation and removal of the remaining wastes would be much less than estimated in the Proposed Plan ($92 million).

The Navy still has not adequately characterized the contents of the waste cells. According to the Spring 2007 Basewide Annual Groundwater Monitoring Report [3], IR Site 1 accepted all of the solid waste generated at Alameda Point between 1943 and 1956. Wastes included municipal garbage, construction debris, transformers, cleaning solvents, oil/lubricants, ordnance and explosive waste, and radiological materials such as radium dials and buttons. There was a golden opportunity to take samples and analyze them for toxics during the exploratory trenching. Unfortunately, the Navy was explicit that they were not going to characterize the wastes and that they were only trying to prove the absence of intact drums (a negative objective). Even though the Navy said they weren't

going to characterize the wastes, measurements of radioactivity were made during the trenching operations.

Figure 1-1 from the trenching report is attached and has been annotated by the writer. Note that five of the trenches were located relatively close to the walls separating the waste cells. These locations have been circled in the figure. If the locations of these trenches were off only slightly, the trenches may have been cut into the walls between the cells or into the sloping portions of the walls. Thus, it would not be surprising if little or no waste debris were found.

Of the eleven trenches, seven showed some excessive radioactive contamination (as indicated on the trenching logs for the respective trenches). Perhaps more significantly, six of the seven cells had some radioactively contaminated soil in the excavated soil.

Consider the carefully worded conclusion of the trenching report, i.e. that it should not be inferred that the radiological contamination is consistent throughout the waste volume. The word "consistent" can be taken as meaning uniform or at the same concentrations throughout. Certainly no one would expect that. What can be reasonably concluded is that radioactive contamination of the subsurface material is widely scattered throughout the waste cells (but not uniformly).

Another observation from Figure 1-1 is that the southernmost cell (in which trench T-6 was excavated) overlaps or abuts the shoreline. This indicates that either wastes from this cell are currently exposed to the Bay or that they could easily be exposed by minor shoreline erosion in the future. Note also the notation from the T-6 trench log that all the excavated soil from this cell was radioactively impacted. One would expect some radioactive contamination of the adjacent beach area.

It is also significant that little or no municipal (household) wastes were found and that Mr. Brooks stated that such wastes were moved to Site 2. The Navy early on relied on the presence of municipal rather than industrial wastes as justifying the "presumptive remedy" of source containment. It appears that the justification for the "presumptive remedy" has been substantially weakened.

From the report and accompanying photographs, it appears that trenching only went down 7 or 8 ft from the surface to the groundwater level. There could be wastes buried deeper. It is likely that groundwater and the depth of the bay mud aquitard do not coincide. If the wastes were used as fill, the wastes could extend down to the original level of the Bay's bottom (i.e. sand or mud). See the attached figure from a presentation by the Navy's former Remedial Project Manager, Mr. Rick Weissenborn, that shows the sea level 8 ft below the surface, but fill going down to about 25 ft below grade or 17 ft below sea level. One can reasonably assume that the groundwater level is approximately at, or slightly above, sea level. Aerial photos of the Site 1 waste cells (from the Feasibility Study) appear to show ponds in the bottom of at least two cells. This indicates that the excavations went substantially below the groundwater levels.

Conclusion

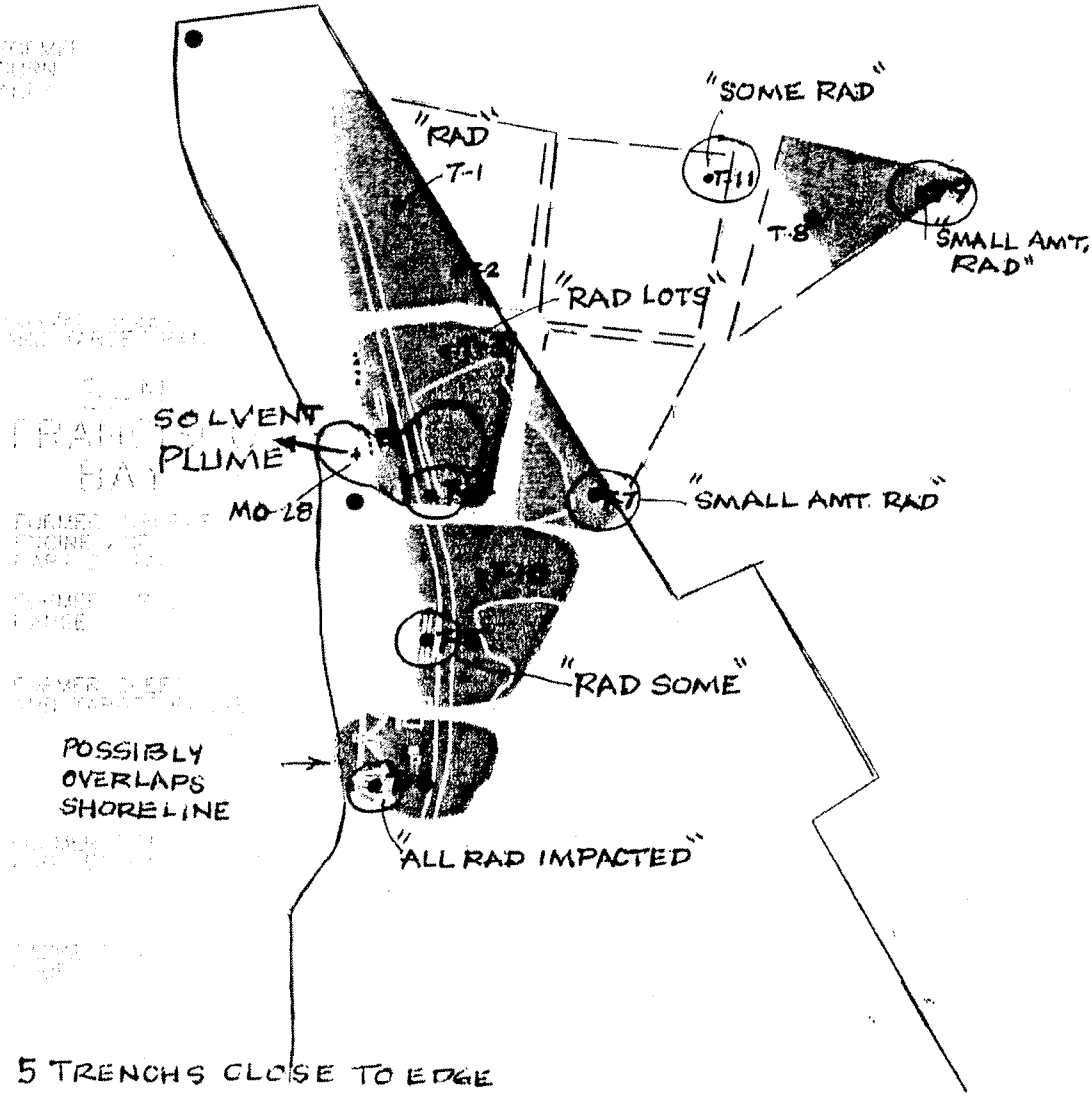
The trenching report demonstrates that a substantial fraction of the material buried in the waste cell area is radiologically impacted. Further, this radiologically-impacted material is widespread and randomly scattered. If this material finds its was to the surface in the future, it will have to be removed from the site because it is radiologically-impacted at levels (> 6,000 counts per minute) that are unacceptably high.

References:

(1) "Final Summary of Findings Exploratory Trenches, Revision 1, IR Site 1, Former Naval Air Station, Alameda, Alameda Point, Alameda, California", May 15, 2008, prepared by Tetra Tech EC, Inc. for BRAC Program Management Office West.

(2) "Draft-Final Feasibility Study Report IR Site 1, 1943-1956 Disposal Area, Alameda Point, Alameda, California", Jan. 2006, prepared by Bechtel Environmental, Inc. for the BRAC Program Management Office West.

(3) "Final Spring 2007, Alameda Basewide Annual Groundwater Monitoring Report, Alameda Point, Alameda, California", April 2008, prepared by Innovative Technical Solutions, Inc. for BRAC Program Management Office West.



5 TRENCHS CLOSE TO EDGE
OF 11 TRENCHS
7 HAD SOME RAD CONTAMINATION
4 W/O RAD CONTAMINATION
OF 7 CELLS,
6 HAD SOME RAD CONTAMINATION
225 CY TOTAL VOLUME EXCAVATED (PG. 3)
57 CY RAD-IMPACTED SOIL (> 6000 CPM)

LEGEND

- IR SITE 1 AND 32 BOUNDARIES
- DISPOSAL AREA BOUNDARY
- SEASONAL WETLAND BOUNDARY
- RMA BOUNDARY
- TRENCH LOCATIONS
- SEASONAL WETLAND AREA
- DISPOSAL CELL

N

300 150 0 300
SCALE IN FEET

Figure 1-1
TRENCH LOCATIONS

IR SITE 32 AND THE SHORELINES OF IR SITES 1 AND 2
ALAMEDA POINT – ALAMEDA, CA

TETRA TECH EC, INC.

DRAWN BY: MD	CHECKED BY: LB	APPROVED BY: KW	DCN: ECSD-2201-0015-0005.R1	DRAWING NO: 000411.DWG
DATE: 10/19/07	REVISION: 0		CTO: #0015	

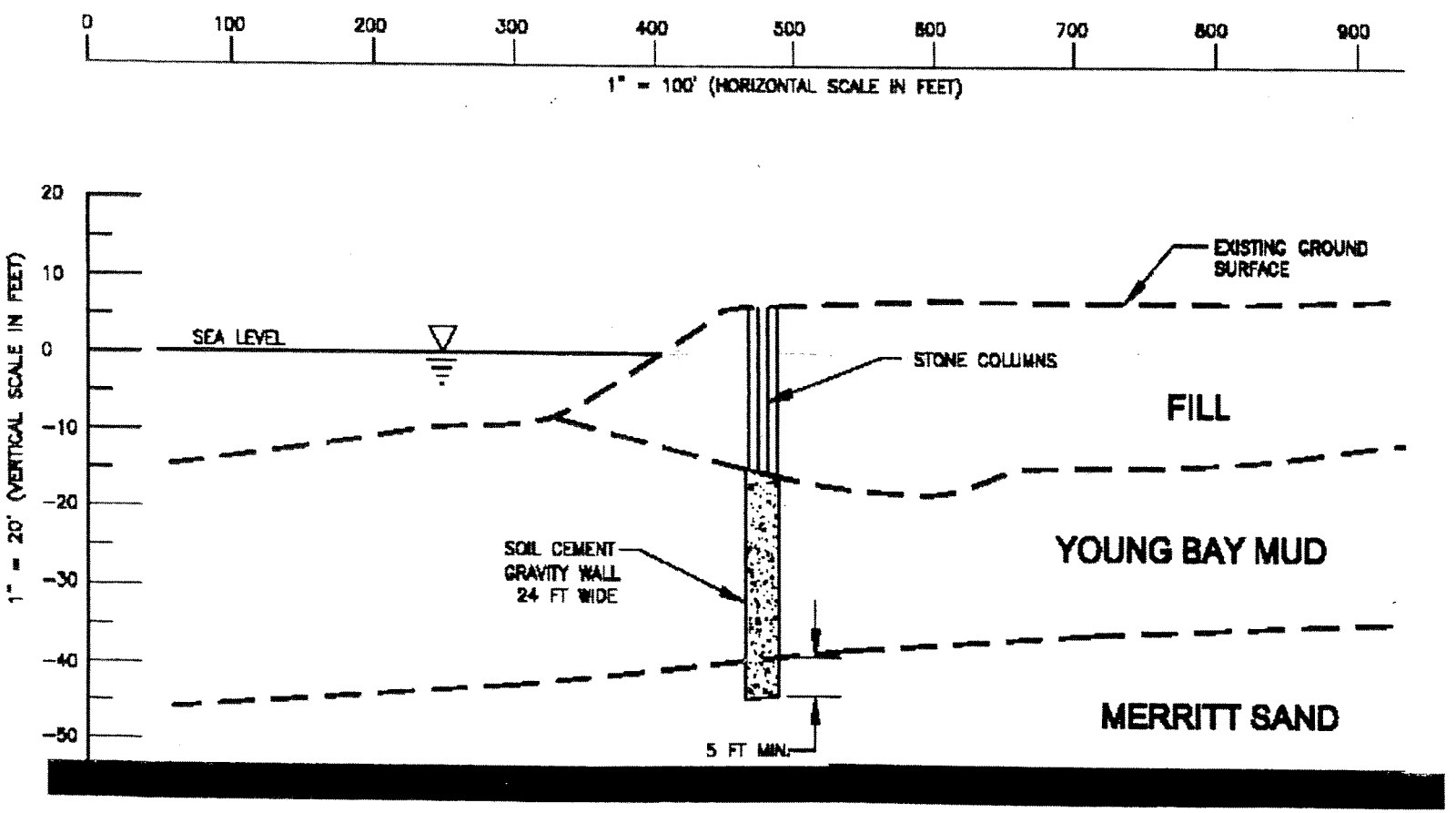
P:\3210-RAC IV\CTO-0015\DWG\0004\000411.DWG

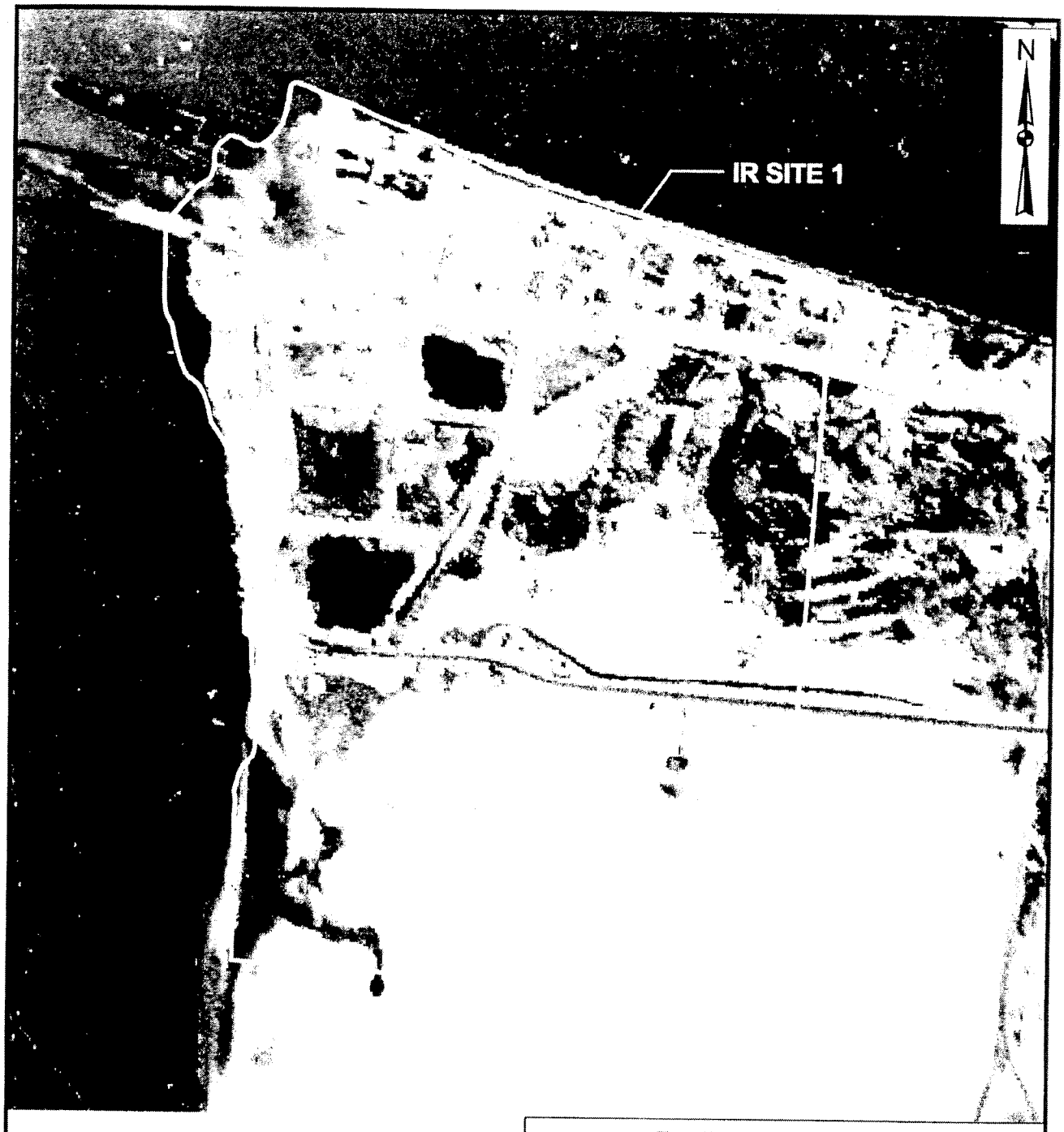
SOURCE: "OPERABLE UNIT 3 FE[illegible]IBITY STUDIES"
A PRESENTATION BY RICK WEISSENBORN,
REMEDIAL PROJECT MANAGER, JAN. 7, 2003

ALAMEDA POINT

ALAMEDA, CALIFORNIA

Recommended Geotechnical Alternative





400 0 400 Feet

SOURCE: PACIFIC AERIAL SURVEYS. 1947. SCALE 1:2,400.

Feasibility Study for IR Site 1

Figure 2-2

1947 Historical Aerial Photograph

Alameda, California

Bechtel Environmental, Inc.

CLEAN 3 Program

Date: 12/16/05
File No.: 068E13582
Job No.: 23818-068
Rev No.: B

Deficiencies in the Proposed Plan

The Navy's proposed plan for the waste cell (Area 1a) portion of Site 1 is 4 feet of soil cover and in-situ chemical oxidation for treatment of the volatile organics plume. In November 2006, the community RAB members took the position that excavation of the contaminated portion of the wastes is the appropriate remedy for Area 1a because the types of waste materials disposed of in the waste cells contained a larger proportion of industrial type (potentially hazardous wastes). The proximity to San Francisco Bay, nearby wetlands, and a high water table, favor excavation and off-site disposal rather than source containment as the preferable alternative. The City took the position in 2007 that they would not accept transfer of a site containing uncharacterized wastes with a soil cover. Nevertheless, the Navy is proceeding with plans to issue a Record-of-Decision based on the Proposed Plan.

An example of current best practices for military landfills [1] is the excavation and off-site disposal of contaminated material at the 5-acre former Connaught Military Landfill near Ottawa, Canada. The site contained mechanical debris from target maintenance, potential unexploded ordnance, paint cans with paint residue, hospital wastes, broken concrete and hydrocarbon impacted soil. Off-site disposal costs were reduced by sorting our inert waste materials (concrete, bricks, and steel) and disposing of them on-site. The site was considered environmentally sensitive because of its proximity to the Ottawa River, the City of Ottawa and a bird sanctuary (an analogous situation to that which exists at Sites 1 and 2).

Concerns about the Navy's proposed remedy include:

a. <u>The source containment, as proposed, is inadequate</u> because the sandy soil cover does not meet low-permeability standards for hazardous waste landfills and there is no lateral containment. The most southern waste cell apparently overlaps the shoreline and also contains radiologically impacted materials. The Navy has recently said that a rodent barrier and plastic sheet will be added to the top cover, but this has not yet been documented in writing and there aren't any design specifics. An example of an integrated containment system is the Mare Island landfill [2]. That application represents integrated source-containment. The RCRA Subtitle C cap includes a composite gas vent layer, a geocomposite clay layer, a 60-mil high-density polyethylene geomembrane, a geocomposite drainage layer and two feet of cover soil. The 72-acre landfill site was surrounded by a 7,300-ft long soil-bentonite slurry wall 25-ft deep and keyed into a naturally-occurring clay layer underlying the site.

b. <u>The integrity of the top cover may be compromised by liquefaction and sand boils [3] as a result of a large earthquake.</u> There is considerable doubt as to whether the Navy will be able to design the

top cap to resist damage during and/or following a large earthquake in the S. F. Bay area. There is nothing to show that four feet of cover will prevent radioactivity or other toxic materials from being brought to the surface by liquefaction as a result of a major earthquake. The Navy says that the seismic design of the cap will be addressed during the remedial design phase. However, there may be no practical, economic way of preventing such liquefaction. The Navy took the position during the May 2008 RAB meeting that geysers and sand boils will not occur at Site 1. However, there is ample scientific evidence that liquefaction has occurred in poorly consolidated sandy fill areas during both the 1906 earthquake and the 1989 Loma Prieta earthquake. During the Loma Prieta event, liquefaction occurred in the Marina District in San Francisco, at Treasure Island, and along the Cypress freeway in Oakland. Sand boils occurred on Treasure Island during the Loma Prieta seismic event [3] (see the attached photos showing these sand boils). Sand boils and/or geysers represent the conversion of kinetic energy from the seismic shaking into pore (or static) pressure. This pore pressure can cause liquefaction and/or sand boils. Whether or not sand boils or geysers result, of course, will depend on the violence and duration of the earth movement. The sand boils that happened on Treasure Island during the Loma Prieta event evidence the fact that this can occur. The photos indicate that holes 2 to 3 ft in diameter were created and that sand and subsurface water were ejected from the holes. The Feasibility Study for Site 1 [4], in fact, reported that evidence of liquefaction also was observed at IR Site 1 after the 1989 Loma Prieta earthquake. The Navy's seismic stability study showed 20 ft of lateral displacement of the shoreline and 1 ½ ft of vertical displacement in the cover material after a major seismic event.

It is important that the bayside stability of Site 1 be maintained both to prevent disposed waste materials from being directly released into S. F. Bay, and to maintain the shoreline integrity of the planned park and golf course. The earlier study proposed a rock column/soil cement barrier along the bayside of Site 1. The Navy has retreated from that recommendation and has said that the bayside stability would be achieved by a method to be determined during the remedial design phase. The writer asked, and was assured, that access would be provided to the Site 1 beach area during the July 16, 2008 site tour. However, that area had been fenced off and freshly placed rip rap made it impossible to determine whether shoreline erosion had occurred or whether waste material had been exposed to the bay. One possible solution to shoreline instability, that has been mentioned by the Navy, is the use of 'seismic vents". Such vents would consist of perforated pipes filled with gravel. They would allow pore pressure, which might cause liquefaction, to be vented to the surface during a

seismic event. Such venting could also cause toxic materials and radiologically contaminated soil to be released to the surface.

c. Ground squirrels, gophers and other burrowing animals may penetrate the cover and bayside perimeter. The four-foot cover thickness was selected to provide 2 ft of cover, plus 2 ft to protect against penetration by ground squirrels. The Navy cited a study in the Site 2 Remedial Investigation that ground squirrels do not dig holes deeper than 2 feet. The writer's personal observations are that ground squirrels often dig their burrows along banks. On Bay Farm Island, the squirrels have burrows at the top of the shoreline and have a labyrinth of burrows under the rip rap. These burrows appear to go parallel to the slope for 10 or 15 ft. Also, burrowing owls use the burrows abandoned by ground squirrels and jack rabbits. The owls enlarge and extend the burrows up to a depth of seven feet [5]. Gophers burrow as deep as 6 feet to create nest and food storage chambers [6].

d. The trenching study has shown that radiologically impacted soil is widely scattered within the waste cell area. Physical isolation by the top cover may be compromised by a major seismic event and/or penetration by burrowing animals. Maintenance personnel for the proposed shoreline park and golf course(or restored wetlands) will not be equipped with radiation detectors and likely will not be trained in radiological removal or recognize the danger presented by surface releases of soil contaminated by radioactive and toxic materials.

e. In-situ chemical oxidation (ISCO) may not be effective in treating the solvent plume because the injected oxidants may force the contaminants away from the injection points. Subsurface heterogeneities and preferential flow paths can cause uneven distribution of the oxidant, resulting in untreated pockets of contaminants [7]. Because the volatile plume is close to the shoreline, there is a danger that the injection of oxidants will displace the plume into the bay. Also, within the ISCO treatment zone, changes in the oxidation states and/or pH may result in the mobilization of radium and other toxic metals [7]. If you have high concentrations of contaminants in a well-defined plume, there is a good opportunity to remove a lot of mass by pumping and treating. Later, ISCO could be used for polishing.

f. The high concentrations (exceeding 100,000 μg/L) of volatile organic compounds (VOC's) in the groundwater plume indicate that dense non-aqueous phase liquids (DNAPL's) probably are present under the plume. The Proposed Plan [9] for Site 1 states that DNAPL's may be present. These DNAPL'S have a tendency to make the bay mud aquitard more permeable. Thus, it would be expected that pathways might open up for contaminants to flow into the second water-bearing zone.

g. The radium hazard is not whole body radiation, but rather, internal via inhalation and ingestion. Radium is a bone-seeker that can cause

bone cancer, leukemia, or lung cancer if it gets into the body. Direct contact with radiologically impacted soil and toxic materials brought to the surface in the future poses an inhalation and ingestion hazard to adults and children who might come into contact with such exposed materials. The 1,600-year half-life of radium brings into question the long-term containment integrity due to seismic activity, shoreline erosion, burrowing animals, and site inundation (global climate change and tsunamis). Note that even without the effects of man-made greenhouse gases, the bay water level has risen 25 to 30 ft over the last 3,500 years [8]. The Navy has said that it does not have to design for rising sea levels, but it is illogical to design for some physical phenomena and not others.

h. The presentation by SunCal on August 7, 2008 showed the western portion of the "northwest territories" being used for wetlands restoration, with return to Bay wetlands instead of a golf course. If it is planned to excavate portions of Site 1 to create permanent wetlands, this appears incompatible with leaving large quantities of uncharacterized wastes and radiologically impacted soil in place under a cap. In fact, the creation of an engineered cap in such a situation appears wasteful. There needs to be closer coordination between the Navy, the City of Alameda and the developers regarding cleanup, restoration, and development plans.

References

(1). Don Plenderlieth, Golder Associates, "Cleanup Duty", pg. 41, Mechanical Engineering, Feb. 2008.
(2). "Successful Public-Private Partnership at Former Mare Island Naval Shipyard", 2006, 4 pages, U. S. Department of the Navy.
(3). "Treasure Island Reuse Plan, Existing Conditions Report: Volume 2, Physical Characteristics, Building and Infrastructure Conditions, prepared by ROMA Design Group, Cerbatos & Associates Consulting Electrical Engineers, Cervantes Design Associates, Don Todd Associates, Manna Consultants, Moffat & Nichol Engineers, Olivia Chen Consultants, Inc., Takahashi Consulting Engineers, and Treadwell & Rollo, Inc., for The Office of Military Base Conversion, Planning Department, City & County of San Francisco, and the San Francisco Redevelopment Agency, August 1995, Second Edition.
(4). "Draft-Final Feasibility Study Report IR Site 1, 1943-1956 Disposal Area, Alameda Point, Alameda, California, Volume 1, Part A", page 2-28, Jan. 2006, prepared by Bechtel Environmental, Inc. for the BRAC Program Management Office West.
(5). "The Gull's Call", May/June 2008, article on page 7, "Burrowing Owls on Bay Farm Island" by Gerry Long.
(6). Alameda Journal, June 13, 2008, article by Nzong Xiong, "Going after Gophers; learn how to get rid of the uninvited lawn guests".

(7). "Draft Feasibility Study, IR Site 32, Alameda Point, Alameda, California", June 2007, prepared by Bechtel Environmental, Inc. for BRAC Program Management Office West.
(8). "Geologic Guidebook of the San Francisco Bay Counties", Bulletin 154, State of California, Division of Mines, 1951.
(9) September 2006, "Proposed Plan for IR Site 1, 1943-1942 Disposal Area, Former NAS Alameda", BRAC Program Management Office West.

Large sand boils near the western edge of Treasure Island.
Photo courtesy of David T. Schrier

TREASURE ISLAND REUSE PROJECT Treasure Island, California
LOMA PRIETA EARTHQUAKE PHOTOGRAPH
Project No. 1719.01 · Figure 7
Treadwell&Rollo

Large sand boils near the southwest corner of Treasure Island.
Photo courtesy of David T. Schrier

TREASURE ISLAND REUSE PROJECT Treasure Island, California	
LOMA PRIETA EARTHQUAKE PHOTOGRAPH	
Project No. 1719.01	Figure 8
Treadwell&Rollo	

Sand boils and ponded water at school yard on 12th Street, Treasure Island, on October 18, 1989.
Photo courtesy of David T. Schrier

TREASURE ISLAND REUSE PROJECT Treasure Island, California	
LOMA PRIETA EARTHQUAKE PHOTOGRAPH	
Project No. 1719.01	Figure 11
Treadwell&Rollo	

Questions

1. What were the volumes and locations of wastes moved from Site 1 to Site 2 during construction of the runway? Where in Site 1 did the wastes originate? Where in Site 2 were the wastes deposited?
2. During the TCRA, for each location in Site 1, Site 2, and Site 32 what were the volumes and depths of radiologically impacted soil excavated and removed? (Note that during the site tour, were told that there was very little waste and that it was only on the surface at the "radium disposal pit". This seems counterintuitive in view of the Navy's letter that stated that radiologically impacted soil in Areas 3a and 3b were deeper than expected.)
3. Where was radiologically impacted soil taken for disposal?
4. During the TCRA, for each location in Site 1 what were the volumes and depths of soil contaminated with PAH's that were excavated and removed? Was the burn area 1b the only location involved?
5. During the TCRA, what were the volumes of soil excavated from the firing range berm? What volume of lead-contaminated soil was disposed of offsite and where did it go? How far below grade did the excavation go? What was the volume of below-grade material that was excavated and removed? (A former Navy fighter pilot stationed at Alameda said that they took their Corvairs onto downward sloping ramps and test fired their 20-mm cannons into a below grade pit.) Was the soil removed from the firing range berm surveyed for radioactivity? (Note that the exploratory trench in the area showed "all rad contaminated".)
6. During the exploratory trenching, of the 57 cu yd of radiologically impacted soil removed, what volumes came from the respective trenches?
7. Why are groundwater-monitoring wells, sampled for groundwater monitoring reports, approximately 100 yd apart? At this spacing, contaminated plumes as large as the known plume could be entering the Bay between monitoring wells.
8. Will the barge(s) that protrude from the bank along the shoreline be removed before transfer of the site? This situation appears to present an attractive nuisance and danger to those (especially children) using the shoreline park and beach area.
9. Is excavation and removal of the most southern waste cell planned because of its proximity to the Bay, shoreline seismic weakness and the prevalence of radiologically impacted soil?

August 14, 2008

DEPARTMENT OF THE NAVY
BASE REALIGNMENT AND CLOSURE
PROGRAM MANAGEMENT OFFICE WEST
1455 FRAZEE RD, SUITE 900
SAN DIEGO, CA 92108-4310

Frank –
I think this is a significant curveball with regard to Site 1.
George

5090
Ser BPMOW.DR/0535
JUN 25 2008

Ms. Anna-Marie Cook
U.S. EPA
Region IX
75 Hawthorne Street
San Francisco, CA 94105-3901

Ms. Dot Lofstrom
Department of Toxic Substances Control
8800 California Center Drive
Sacramento, CA 95826-3200

Mr. John West
Regional Water Quality Control Board
1515 Clay Street, Suite 1400
Oakland, CA 94612

Dear Federal Facility Agreement Members:

Subj: PROPOSED CHANGES TO CLOSURE STRATEGIES FOR SITE 1 AND SITE 32, ALAMEDA POINT, ALAMEDA, CALIFORNIA

The Navy outlined a proposal to modify the closure strategy for Installation Restoration (IR) Site 1 at the April 15, 2008 and June 17, 2008 BRAC Cleanup Team (BCT) meetings. The proposed change in strategy is based upon the latest findings of the Sites 1, 2, and 32 Time-Critical Removal Action (TCRA) conducted from February 2007 through the present. The findings of the TCRA affect the Conceptual Site Models and the closure strategies for adjacent Sites 1 and 32 and for the area located east of Site 1 and south of Site 32. This letter proposes a change of closure strategy for these areas.

The Sites 1, 2, and 32 TCRA is now complete, with the exception of the final radiological status survey, some outstanding laboratory analyses, and report preparation. To accomplish the TCRA objectives for Sites 1 and 32 the Navy intended to: 1) determine the extent of surface radiological impacts; 2) Remove discrete radiological objects from surface soil (less than 2 feet below ground surface); and, 3) Obtain radiological free-release for these areas.

The TCRA included Site 1 Areas 3a, 3b, 5b, and Site 32, which are outside of the landfill footprint. The potential for radiological contamination in these areas was considered low, with potential radiological contamination possible in surface soil due to site grading, spillage during refuse shipment, and wind erosion. Preliminary findings of the TCRA are as follows:

- Radiological contamination is limited to radium-226, which was used in the manufacture of luminescent dials and gauges;
- Low levels of radium-226 were found in soil at Site 1 Areas 3a, 3b, 5b, and at Site 32; the vertical extent was not investigated below 2 feet below ground surface;

- The lateral extent of radium-226 in soil east of Site 1 and south of Site 32 was not completely determined; and
- The lateral and vertical extent of radium-226 in soil does not fit the current conceptual site model for Site 1 Areas 3a and 3b and Site 32, warranting a change in the model.

Conditions at Site 1 Areas 1a, 1b, 2a, 2b, 4, 5a, and groundwater were not investigated as part of this TCRA.

Prior to the TCRA, no action was considered appropriate for Site 32 soil and the following three remedial alternatives were considered for soil at Site 1, Area 3a and 3b:

1. No action;
2. Tier 2 ecological risk assessment, hot spot relocation, institutional controls, and a wetlands mitigation plan;
3. Tier 2 ecological risk assessment, hot spot removal and off-site disposal, institutional controls, and a wetlands mitigation plan.

While the low levels of radium-226 found at Site 1 can easily be identified in surface soil, deeper contamination may not be detected by radiological surveys. Given the deeper than expected contamination at Areas 3a and 3b, and more widespread contamination than expected east of Site 1, at Site 32 and south of Site 32, it would be appropriate to evaluate additional remedial alternatives for soil. Based upon the preliminary TCRA findings, the Navy is proposing to remove portions of Site 1 and include them in Site 32. Site 1 would include Areas 1a, 1b, 2b, 4, 5a, 5b, and groundwater as described in the Site 1 Proposed Plan. In addition to Site 32 soil and groundwater, Site 32 would be expanded to include Site 1 Areas 2a, 3a and 3b, and soil located east of Site 1 and south of Site 32 (actual extent to be determined by a radiological survey). The Navy would then prepare the following documents:

Site 1

- Includes Areas 1a, 1b, 2b, 4, 5a, 5b, and groundwater.
- The existing Site 1 Draft ROD will be used as a basis to issue a Draft-Final ROD describing the change in strategy and deletion of Areas 2a, 3a, and 3b from Site 1.
- No changes are proposed for the selected remedies in the remaining areas.
- During the planning stages of remedial action for Site 1, the Navy will conduct a radiological survey to determine the lateral extent of radium-226 at Site 32.

Site 32

- Includes soil at Site 1 Areas 2a, 3a and 3b, soil and groundwater at Site 32, and soil located east of Site 1 and south of Site 32 in an area yet to be determined.
- An RI/FS addendum that includes findings from the TCRA and explains the addition of Site 1 areas and the expanded soil areas.
- A Site 32 Proposed Plan and ROD will be issued after BCT concurrence with the FS amendment.

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The NCP at 40 CFR Section 300.430(f)(3)(ii) sets forth the requirements that apply when new information becomes available after a Proposed Plan has been released to the public that changes the proposed remedy with respect to scope, performance, or cost such that the remedy significantly differs from that described in the Proposed Plan. If the public could reasonably anticipate the change, then a revised Proposed Plan is generally not necessary; the change need only be described in the ROD.

For areas to be addressed in the Site 1 ROD, no significant changes are anticipated. Therefore, the Navy proposes to move forward on the Site 1 ROD without issuing a revised Proposed Plan or seeking additional public comment.

Site 32 will include a Proposed Plan and public comment period. This will ensure that the public is informed of, and involved with, the revised remedy selection process for Site 1 Areas 2a, 3a, and 3b, Site 32 soil, and for those areas that had their proposed remedy affected by the TCRA findings. This strategy minimizes delay with the selected remedies for Site 1, while allowing BCT input and public review and comment on soil and groundwater remedies for Site 32.

The Navy looks forward to discussing these proposed changes with the BCT. If you have any questions or comments, please call Mr. Derek J. Robinson at (619) 532-0951 or me at (619) 532-0907.

Sincerely,

George Patrick Brooks

GEORGE PATRICK BROOKS
BRAC Environmental Coordinator
By direction of the Director

Enclosures: (1) IR Site 1 Post-Remedial Excavation NaI Field Readings and Soil Sample Ra226 Analytical Results

(2) IR Site 32 Post-Remedial Excavation Soil Sample Ra226 Analytical Results

(3) Current and Proposed Areas of Installation Restoration Sites 1 and 32

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Copy to
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Russell Resource, Inc.
440 Nova Albion Way
San Rafael, CA 94903

Mr. George Humphreys
Community Co-chair
Restoration Advisory Board
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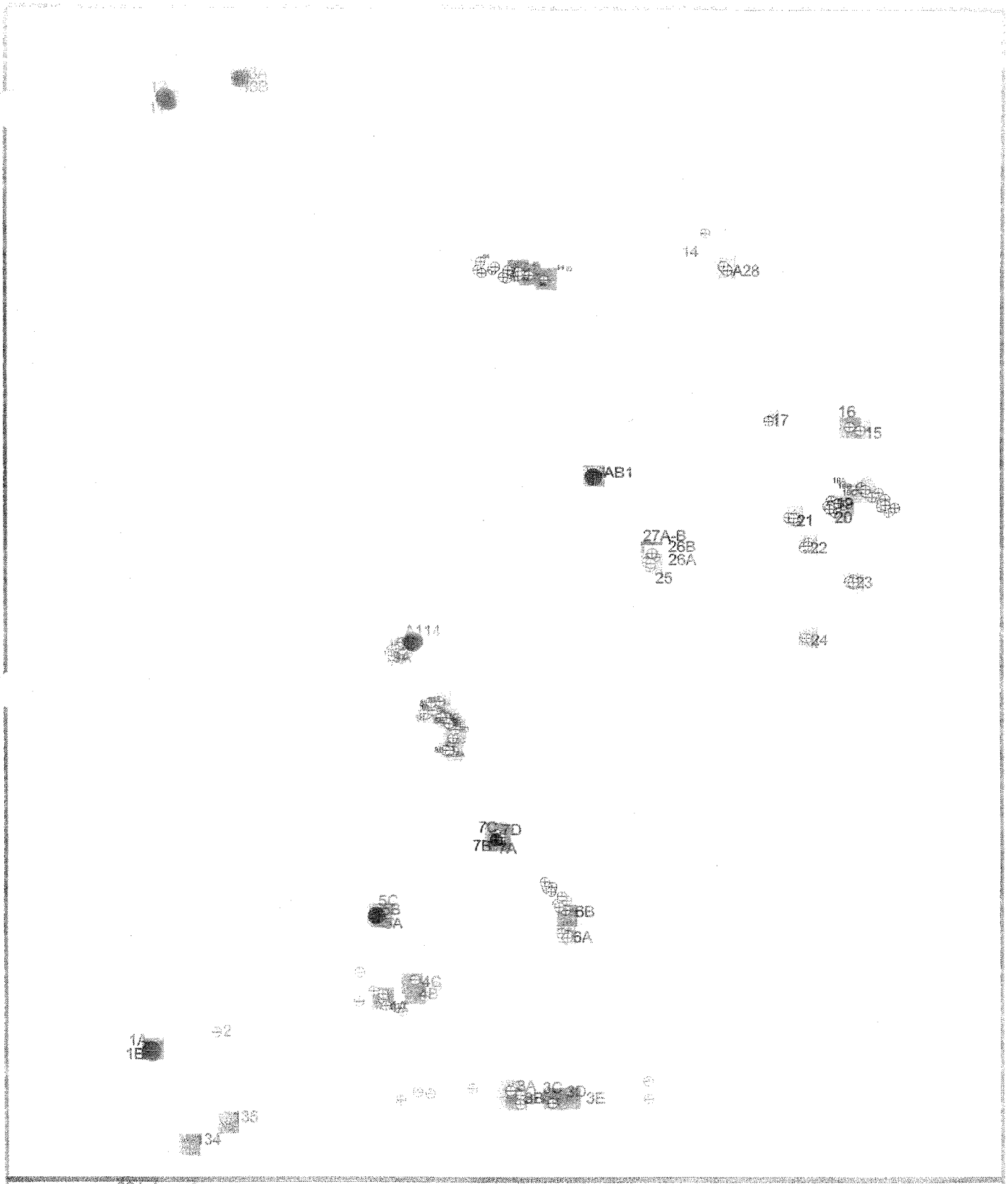
Alameda, CA 94502



Gross CPM	SS Lab (pCi/g)
< BL (<8k)	< 1
8k - 7k	1 - 2
7k - 10k	2 - 5
8k - 25K	5 - 10
> 25k	> 10

CTO-015(28) Alameda Point
IR Site 1 Post-Remedial Excavation
Nal Field Readings
and Soil Sample Ra226 Analytical Results

100 0 100 Feet

TETRA TECH

Soil Sample Lab Results
(Ra-226 pCi/g)

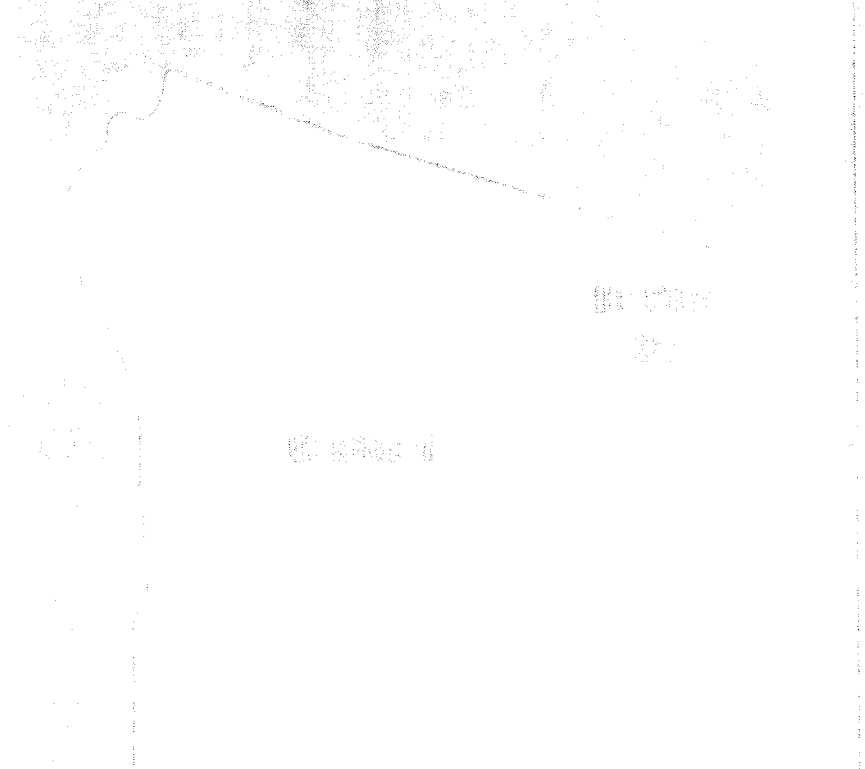
- < 1
- 1 - 2
- 2 - 3
- 3 - 5
- > 5

CTO-015(28) Alameda Point
IR Site 32 Post-Remedial Excavation
Soil Sample Ra226 Analytical Results

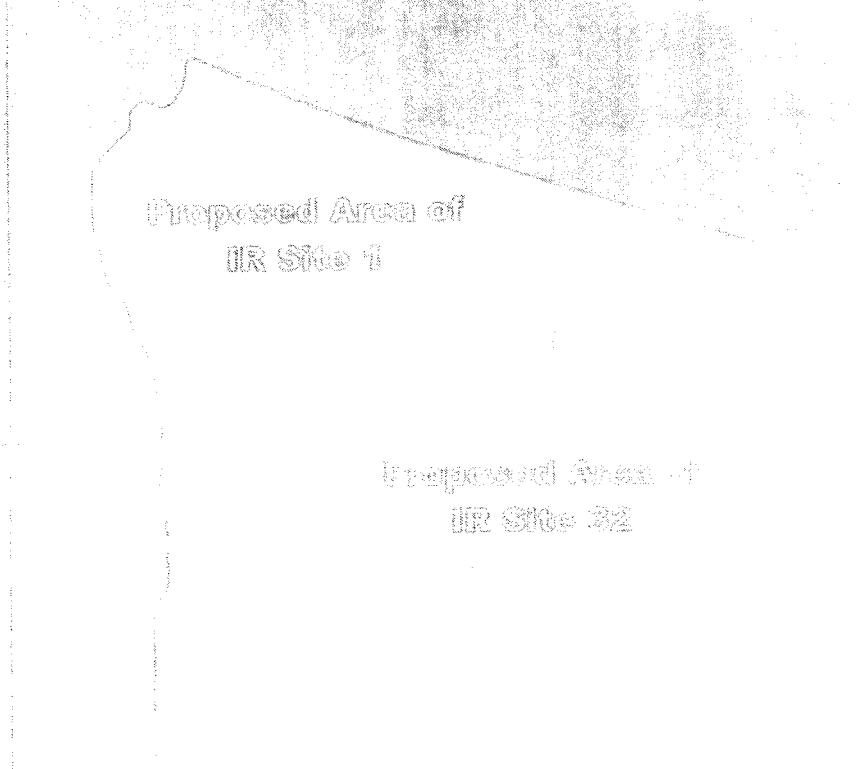
10 0 30 Feet

TETRA TECH

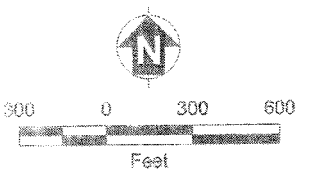
Current Areas of IR Sites



Proposed Areas of IR Sites



IR Site 1
IR Site 32
Area Yet To Be Defined
Building
Road or Runway
Building/Structure
Water



Note:
IR Installation Restoration

ChaduxTt JV

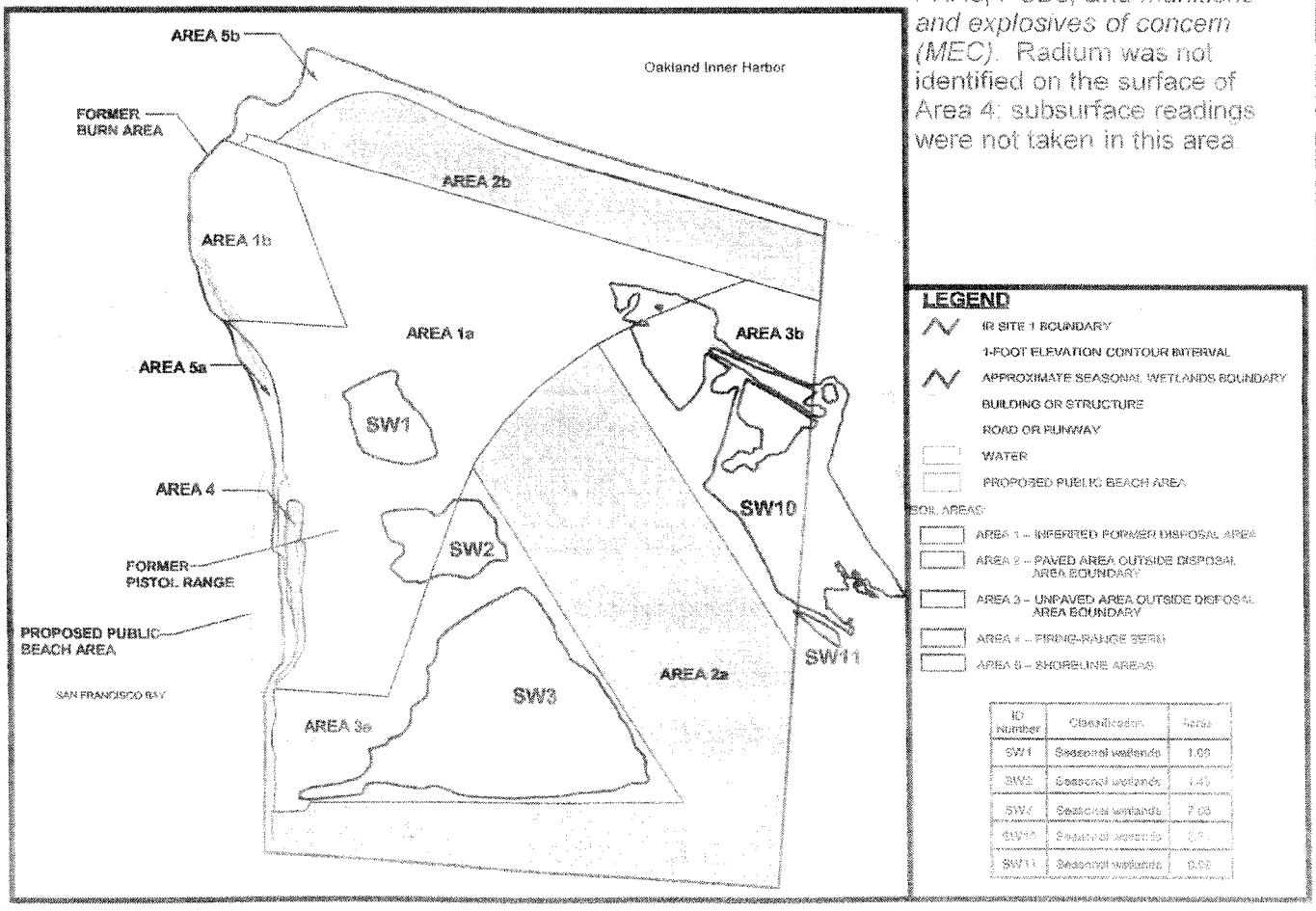
Alameda Point, Alameda, California
U.S. Department of the Navy, BRAC PMO West, San Diego, California

CURRENT AND PROPOSED AREAS OF INSTALLATION RESTORATION SITES 1 AND 32

From 1991 to 2004, the Navy conducted a series of soil and *groundwater* investigations at *IR* Site 1. Additionally, from 1998 to 1999, the Navy performed a pilot-scale demonstration of *in situ* (or in ground) treatment for the remediation of chlorinated solvents and petroleum hydrocarbons in *groundwater* at *IR* Site 1. The demonstration used a funnel-and-gate system to reduce concentrations of *VOCs* in *groundwater*. In 2003, a geotechnical and seismic study was conducted to examine the ability of the embankment that separated the area of solid waste from the shoreline to prevent releases of solid waste into San Francisco Bay.

Contaminants identified in soil included *total petroleum hydrocarbons* (*TPH*), *PAHs*, pesticides, *PCBs*, metals, and radium. For management purposes, the site was divided into the following five geographical areas for soil (see Figure 3), and site-wide radium-impacted waste in soil. *TPH* contamination is being addressed under a separate corrective action program and is not discussed further in this Proposed Plan.

- **Area 1** is the former waste disposal (Area 1a) and burn area (Area 1b), which includes a suspected radium-containing disposal trench (Area 1b). Surface soil in this area is contaminated with *PAHs*, pesticides, *PCBs*, and metals. In addition, elevated radium levels were measured in this area.
- **Area 2** consists of the paved areas (such as runways and taxiways) outside of the former disposal area. Radiological surveys were not conducted because paved surfaces shield radium levels from detectors. Area 2 is presumed to have elevated radium levels similar to those in Area 3 (see discussion below).
- **Area 3** consists of the unpaved areas outside of the former disposal area. Surface soil in this area is contaminated with *PAHs*, *PCBs*, and metals. In addition, elevated radium levels were measured in Area 3.
- **Area 4** consists of the former pistol range berm, and is located within the boundaries of Area 1. Surface soil in this area is contaminated with *PAHs*, *PCBs*, and *munitions and explosives of concern (MEC)*. Radium was not identified on the surface of Area 4; subsurface readings were not taken in this area.



ID Number	Classification	Acres
SW1	Seasonal wetlands	1.00
SW2	Seasonal wetlands	1.45
SW3	Seasonal wetlands	7.05
SW10	Seasonal wetlands	[illegible]
SW11	Seasonal wetlands	0.02

Figure 3. Layout of Soil Areas at Site 1