

UNITED STATES OF AMERICA
DEPARTMENT OF THE ARMY
BASE REALIGNMENT AND CLOSURE PROGRAM
CALIFORNIA DEPARTMENT OF TOXIC SUBSTANCES CONTROL
SAN FRANCISCO REGIONAL WATER QUALITY CONTROL BOARD
CALIFORNIA STATE COASTAL CONSERVANCY

)
HAMILTON ARMY AIRFIELD)
MAIN AIRFIELD PARCEL)
RECORD OF DECISION/)
REMEDIAL ACTION PLAN)
AND) No. _____
SUBSEQUENT ENVIRONMENTAL)
IMPACT REPORT)
_____)

Wednesday
July 9, 2003

Auditorium, Marin Humane Soc.
171 Bel Marin Keys Blvd.
Novato, California

The public hearing convened, pursuant to notice,
at 7:14 p.m.

BEFORE: DEAN AMUNDSON
Jones & Stokes
Moderator

ALSO PARTICIPATING:

TOM GANDESBERY, California Coastal Conservancy
LANCE McMAHAN, CE, DTSC, Remedial Project Manager
CURTIS SCOTT, Regional Water Quality Control Board
ED KELLER, PE, US Army, BRAC Coordinator
ERIC POLSON
ELENA BELSKY
BARBARA SALZMAN
GRANT DAVIS
MARUCIA BRITTO
ALAN BERSON
BILL McNICHOLAS

P R O C E E D I N G S

MR. AMUNDSON: Okay, if everybody=s ready, maybe we=ll get started.

I want to thank you all for coming tonight. This is the public hearing for the Hamilton Main Airfield Parcel, Record of Decision and Remedial Action Plan, and also for the Subsequent Environmental Impact Report for the ROD/RAP.

Can you all hear me okay, is this working?

Okay, good. My name is Dean Amundson. I=m with Jones & Stokes, and we=ve been retained by the Conservancy to assist them with the subsequent environmental document and I=ll be moderating and assisting this evening.

Again, the purpose of the meeting is to solicit public comments on two documents, and I want to emphasize that we=re here to review two separate documents, the ROD/RAP, the Record of Decision/Remedial Action Plan and the Subsequent Environmental Impact Report.

So there are a number of materials available as you come in. There=s an agenda for tonight=s meeting, there=s a sign-in sheet, so please make sure you=ve signed in. Also there=s some facts sheets for the ROD/RAP and the SEIR and I think some handouts from presentations that are

to follow. And there=s also an agenda, and so I=d like to go briefly through the agenda.

I will have a quick introduction, which I=m doing now. Then some explanation of the agency roles and responsibilities, and then an overview of the ROD/RAP, an overview of the Subsequent EIR, and then we=ll have an informal breakout session where we can answer any questions you might have before we move into the formal public comment period.

So I=d ask if possible please hold your questions until the breakout session, and please hold your comments until the formal public comment period. That=s the time in which we really will be trying to capture your comments.

We also have sign language and Spanish interpreters here tonight if you need them, if you request any.

VOICE: No response --

MR. AMUNDSON: Okay, wonderful, thank you.

And so that will bring us to the conclusion.

The ROD/RAP and the SEIR have been developed through a joint process with a lot of agencies that have been involved, and some of those agency representatives are here tonight. I=d like to briefly introduce some of the staff who=ll be here to answer questions.

Tom Gandesbery of the California Coastal Conservancy.

Lance McMahan, with the California Department of Toxic Substances Control.

And Curtis Scott, San Francisco Regional Water Quality Control Board.

And Ed Keller, who is with the army BRAC office here at Hamilton.

And if you guys, Tom, perhaps you could lead it off, just give a brief overview of what your responsibilities are with regard to the documents.

MR. GANDESBERY: Thank you, Dean.

I'm Tom Gandesbery, and project manager with the Coastal Conservancy. And we're involved as a nonfederal sponsor for the restoration project at Hamilton and potentially the Bel Marin Keys parcel to the north. And I can answer specific questions later about that restoration effort.

The -- we've been collaborating with the state regulatory agencies and the army for a couple of years now on getting the cleanup plan finalized and we are involved because they -- there was recognized a need for a CEQA -- or, an analysis of the cleanup plan pursuant to CEQA, which is the California Environmental Quality Act.

So that=s why we=re here tonight.

I hand it over to Ed -- or, to Lance. Lance is next, from Department of Toxic Substances.

MR. McMAHAN: Thanks, Tom.

We have competition going here for darkness.

Okay, my name is Lance McMahan. I=m the remedial project manager for DTSC, Department of Toxic Substances Control. We are the lead state agency at present overseeing the cleanup at Hamilton, and there=s information on how you can reach me and a copy of this whole thing, this three pages, is up at the table if you want it.

The document that everyone is reviewing is called a Record of Decision/Remedial Action Plan, and the Record of Decision part comes from the army side of things, a federal decision document, and the Remedial Action Plan comes from the state side of things. As the state lead agency on Hamilton, the California Health and Safety Code requires DTSC or the Regional Water Quality Control Board, and in this case both of us are doing this, to adopt a remedial action plan for Hamilton. And, of course, remedial action plan simply says what it is you=re going to do to remediate contamination of the site.

And that remedial action plan would need to be consistent with the Comprehensive Environmental Response

Compensation Liability Act, CERCLA, or federal Superfund. And the remedial action plan needs to be protective of human health and the environment, amongst other things. And so that=s why we=re here.

Under that same state law, when we have a remedial action plan we=re required to have a public meeting to come and explain to you folks what=s going on and to address the issues that concern the public. That=s why we=re here.

And this would include, according to the statute, an assessment of the degree of contamination, how widespread is it, what is it, the characteristics of the hazardous substances, are they soluble in water, do they glom onto clay, things like that; an estimate of the time required to complete the remediation, essentially a schedule; and a description of the proposed remedial actions. And that=ll be talked about after -- mostly by Ed Keller this evening, but we=ll all be able to answer questions on the topic.

And after the department finishes getting a RAP signed, we=ll be in transition to have the Regional Water Quality Control Board be the lead agency, mostly because a lot of what=s being done is being done through the implementation of the Hamilton wetland restoration project, for which they oversee the construction.

And with that, I think Curtis Scott from the water

board has a few words to say.

MR. SCOTT: Thank you, Lance.

I'm Curtis Scott. I'm a manager with the Regional Water Quality Control Board. I think many of you have probably met Naomi Feger, who is my staff person who's really the person doing most of the work for us.

I do want to point out at the bottom of this handout a website that you may want to write down, because many of the actions that we will be taking in the future, tentative orders and so forth, will be posted on that website, and you'll be able to access it very easily.

The regional board's role has been so far a supporting role. Our intent has been to ensure the water quality and ecological concerns have been adequately addressed in the Record of Decision/Remedial Action Plan and in the CEQA documentation. We're also a responsible agency for CEQA.

We also have been providing technical oversight, and one of our real goals is to promote the cleanup and the restoration of wetlands, and in this case it's a wetlands restoration project.

Upon transfer of the site, as Lance just mentioned, that we will be taking over the lead role for the restoration, the implementation, the state lead regulatory

agency, and part of that has to do with the laws that we are able to enforce and we're highly involved throughout the bay area. We're a local, one of nine regional boards, and we're local for the immediate nine bay area counties.

And I have right now four staff that are involved with the restoration of five sites, and all those sites are dealing with cleanup of one type or another.

In the not-too-distant future we will be issuing through our board -- we're an organization that has a board that makes decisions on important matters -- will be issuing site cleanup requirements, and what that is really is a state mechanism to ensure that the requirements specified in the ROD/RAP and the CEQA documentation are implemented and we have a mechanism to ensure. It also provides a handy guidance for us and in this case the army, the coastal conservancy and the corps of engineers to follow. So we're all sort of in agreement of where we're going.

Once the cleanup gets going and we actually get into the implementation of actually placing sediment to bring the wetlands up, we'll be issuing what's called waste discharge requirements and that will be the mechanism that has the long-term construction, monitoring and assurance that the wetlands project is functional.

And our authority, I just wanted to point out, is

the California Water Code; it's the Clean Water Act that we'll be utilizing in the waste discharge requirements, and as Lance mentioned, it's the Health and Safety Code.

I thank you.

MR. KELLER: Thank you, Curtis.

My name is Ed Keller. I'm the representative for the army here. I represent the Atlanta field office of the Department of Army base realignment and closure office out of the Pentagon. My main mission out here at Hamilton and role of responsibility out here is to manage the environmental restoration of the site to prepare it for transfer. In this case, we're working on an early transfer and some of the actions will be taken after the transfer; I'll continue to stay on to manage that effort.

My information, I have a handout back at the table, hopefully you picked one up. Contact information is on there. Our office is physically located on the south end of Hamilton. We do have an aerial photo up here, you're welcome to come up later, take a look at our office is down here on the south end of the runway area.

We have all of the documentation and those types of things that you see out here on the tables available in our office for review. They're also available in the public library and on line. And what I'm going to go over is the

overview of the Record of Decision/Remedial Action Plan document that=s out.

Go ahead.

The what we refer to as the ROD/RAP, that document that=s up for review right now, what I=m going to go through a little bit is the process which is the CERCLA process that Lance mentioned, the Comprehensive Environmental Response Compensation Liability Act of 1980, also known as Superfund.

I=ll also be going over a description of the main airfield parcel so you have an idea of what the document covers, some of the assumptions that were made in that document regarding the wetland and wetland restoration, and go over the document itself, how it=s put together, and finally, show you the implementation schedule for getting the cleanups done.

The process, and you have one of these in your handout, is a flow chart, and this is easier for some people to see the next slide you can flip to shows in verbal form the steps along the way. We go through a preliminary assessment and a site inspection phase where we go out and determine if there have been releases of materials at different locations around the property. We have many of the documents over here for the breakout session; you=re welcome to come over, take a look at those.

After that we go through a remedial investigation; for the sites where we have determined that there have been releases we go into more of an investigation phase, determine exactly what compounds are there, what concentrations, the areal extent, the depth of contamination, those types of things. Once we have that type of information, what we did at Hamilton was we undertook some interim removal actions.

The interim removal actions, we went out in 1998 and 1999 and actually removed soil from a lot of the different sites around Hamilton, hauled it offsite to appropriate landfills. After that point in time we collected samples from those excavations and used all of that data to develop a risk assessment.

After we had developed the risk assessment, we had some idea of what remaining risks were onsite. That=s when we developed not one but two feasibility studies. One is for the inboard area and I=ll get into the description of that in just a moment, and one is for the coastal saltmarsh area. I=ll show you the differences there, where we=re actually talking about on the site. So there=s actually two feasibility studies that were completed.

We have the recommendation and selection of the remedial actions, and that=s what occurs in the Record of

Decision/Remedial Action Plan. At this phase where it's going through public comment, we have recommended actions; once we receive public comment, finalize the document, those will become the chosen actions for the sites.

Once we have that document completed, we'll move into the remedial design, remedial action phase, which is implementation of those requirements. And finally hopefully we'll get to site closeout and there's a chance we may have some long-term monitoring requirements out into the future.

The main airfield parcel description, we have approximately 644 acres, and when you come up and take a look at this photo, it's outlined in red. That's the main airfield parcel that's got the main runway and some of the maintenance areas down in the southern end of it here. Along the boundary, the eastern boundary, over near San Pablo bay, there's a stretch of property that the army still owns, it's out on the coastal saltmarsh, it's about a hundred foot wide and that parallels the levee. And so when we talk about the inboard parcel or the inboard area, it's the levee itself and everything to the west of that in this main parcel. When we talk about the coastal saltmarsh, it's this hundred-foot-wide strip along the eastern boundary, and then beyond that out to San Pablo bay, there's some more coastal saltmarsh that's currently owned by the state lands

commission, about another 78 acres or so out there.

And so the document covers all of the sites on inboard area and the sites in the coastal saltmarsh, both on the army property and as they extend over onto the state lands commission property.

The types of sites that we have, we have army BRAC, and BRAC is the base realignment and closure again, army BRAC sites, sites on the property where we've identified releases and most, for most case, are scattered throughout this main area of the property. We have a lot of different revetment pads, different spoil piles and things of that nature out there. Besides those individual sites that have been identified, there's a couple of issues that were identified that are going to be taken on, the responsibility be taken on, by the Hamilton wetland restoration project and the army civil works program, and those include areawide DDTs and some PAHs which are a petroleum product that's adjacent to the runway on the southern end of the runway and the margins of the runway here.

The other items, there were a few other items that have been identified as army BRAC environmental issues and the document also covers those. so the ROD/RAP covers all the army BRAC issues, the issues that'll be handled by the

army civil works program and these additional environmental issues that have been found that still need some investigation.

You've got a -- the next slide in your handout shows you a map of the installation and there's also on the back table a fact sheet which also has a very similar map and some description along with that. This identifies the different sites around the property here that the document speaks to directly.

The wetland assumptions that were made during the development of the ROD/RAP, right now the inboard property is an upland-type habitat, grassland, native grasses. We assumed that the outboard marsh would remain to be outboard marsh in its future use. The inboard area through the wetland project will become a wetland, so that's going to be how we're looking at it in the future in this document. We assume that imported dredged material will be used to raise the elevation of the inboard area to facilitate that wetland development. Due to subsidence of some of the property, especially out near San Pablo bay out here on the northeastern area of Hamilton, some of the site soils are about seven to eight feet below sea level. And the marsh plain develops at about three feet above sea level, directly adjacent to it out here along the San Pablo bay.

And so there=s a great difference in the surface elevations. The inboard property needs to be brought up to a particular elevation before the channel is cut to reintroduce tidal action. That=s the plan, so that it basically jump-starts things, so mother nature does not need to deposit all of that material by coming in on the tide.

We assume that there will be a channel cut. That channel cut that we=ve looked at so far along with the preliminary design of the wetland is up in this northern corner of the property near the where the pump stations are at, the stormwater pump stations. We assume that that will go through that area to reintroduce tidal action, and we also assumed right now that the endangered species that are present out in the existing coastal saltmarsh will be present eventually on the inboard side once the habitat takes place or takes hold there.

The ROD/RAP document itself, the guidance, per -- the things we=ll go through, the guidance for that document, the purpose of the document, the site evaluations, how we did that, the alternatives that were developed in the document, and then these other army BRAC issues, and finally, a summary.

The guidance documents, Lance had mentioned the CERCLA of 1980; there=s also the National Oil and Hazardous

Substance Pollution Contingency Plan, known as the NCP, that implements the Superfund laws. There=s also a Superfund Amendments Reauthorization Act, SARA, of 1986, that is in effect, and the California Health and Safety Code.

Now we=re operating at Hamilton under both federal and state regulations. That=s why they=re listed here. And hence the name of the document being a ROD/RAP, on the federal side and on the state side of regulations.

The purpose of the ROD/RAP, it was jointly prepared by the army and DTSC and the water board to present the recommended remedial actions for the specific sites. It explains the factual and legal basis for choosing the alternatives that are there. The ROD/RAP also provides a mechanism for public comment on the remediation process at Hamilton. That=s what we=re going through right now, is it=s open for public comment, we have a public meeting, we=re interested in receiving all your comments and incorporating that into our process. It also outlines the actions that will be taken by either army BRAC or, and/or the army civil works programs.

The site evaluations that were accomplished, we did a screening of the sites through the feasibility study and the risk assessment phase. Those sites that had some chemicals of concern that would either pose a risk or were

above particular goals, those were identified and they're listed up here, the different types of compounds that were identified at sites. Some of the observations that were made through the risk assessment process, that we do not have any current or anticipated unacceptable human health risks and that there is no current significant risk to terrestrial receptors.

So the issues that really are coming through is for the future wetland receptors that we expect to inhabit the site. That's where the greatest concern is.

The chemicals that have been identified have limited solubilities and mobilities, particularly in a brackish wetland environment which is somewhat on the basic side and these types of contaminants normally would not be very soluble in that environment and would like to hold onto the clay and organic-type soils that they're in.

We developed and screened four different alternatives in the document. Those alternatives were developed and evaluated based on there's nine criteria through CERCLA that you're required to take into consideration. They are the overall; protection of human health and the environment, compliance with applicable and relevant and appropriate requirements, long- and short-term effectiveness, the reduction of toxicity mobility and volume

through treatment, the implementability, cost and regulatory acceptance.

Those are the first eight. The ninth one is public acceptance, and that'll be evaluated once the public comment period closes and we can evaluate all the comments that we do receive.

The alternatives in the document, the first one is a no-further-action alternative, and that's exactly what it means. no action would be taken and there would be no restrictions on that site. This is mostly for those sites that currently do not pose a problem. There's the chemicals are either at a concentration that does not pose a risk, or simply they're not there. Some of our sites that we've already cleaned up meet that requirement, where we do not have anything that's been detectable there again.

Second alternative, excavation and haul it offsite. That would be hauled off to an appropriate landfill facility. The -- this alternative is protective of human health and the environment by removing the material off the site and placing it in an appropriate landfill. It doesn't, however, do any reduction of toxicity mobility or volume through treatment, but it does reduce the potential for any potential exposure here at Hamilton.

The third alternative was assessed for the army

BRAC sites that I mentioned; it was not assessed for the wetland restoration project or the civil works issues. This alternative is a manage-in-situ or in-place with monitoring and maintenance for the army BRAC sites. It establishes a performance criteria of having at least three feet of cover over the top of these sites so that you basically are eliminating any exposure pathway to the residuals that are left behind.

This alternative was deemed to be appropriate at many of the sites inboard where the future use of the property is going to be burying it under many, many feet of fill anyway.

The fourth alternative is to manage onsite with monitoring and maintenance, and this was specifically looked at for the army civil works issues. It again establishes a performance criteria, three feet of fill or in equivalent measures where the residuals of those inboard areawide DDTs and PAHs adjacent to the runway exceed the action goals that are outlined in the document. So where we have contaminants at a particular level there would be a criteria of having a three-foot of fill cover on that, or the equivalent measures.

If you have an area where that does not, you cannot meet that criteria, those soils would be excavated

and moved somewhere else onsite where you could meet that criteria of placing them under three feet of fill or some other alternative measure.

In the alternative 3 scenario, one thing I failed to mention, you don't have that same option for onsite management. If, for some reason, it's in a location that the future wetland will not have three feet of fill, those soils must be excavated and hauled offsite. And so there's a little bit of a difference between alternative 3 and 4, in that 4 is allowed to be managed onsite; 3, if you cannot cover it, it's got to be excavated and hauled off to a landfill. So a slight difference there.

The other army BRAC issues that were identified, we had an archive search report that was conducted. It identified several sites, it came down through discussions with regulatory agencies that there's four sites that require some kind of an additional action. They've been identified in the ROD/RAP. The ROD/RAP recommends completing a study and investigation of those sites and using the same evaluation criteria that were outlined in the ROD/RAP to evaluate those sites. If it is determined that they require excavation, the excavation and offsite disposal would be an option for that. If the soils can be managed onsite, in situ, then alternative 3 could be applied to

those sites.

Alternative 4 would not be applied to these sites, since these are army BRAC sites. So these will either fall into, after the investigation, there=s nothing there and would be no further action; there is something there so you have to do either alternative 3 or 4 depending on where it=s located on the site. If it=s in an area that=s going to receive many feet of fill we would propose to leave it in place and fill over the top of it; if it=s not, then it=ll be removed.

The GSA or General Services Administration and BRAC stockpiled soil currently on the runway and it shows up nicely in a lot of the aerial photos. We have a lot of soil piles on the runway. The water board will determine what additional actions are required for the soils. They came primarily from petroleum sites, so the water board would be the lead on determining what the disposition of the soils are.

If, after reviewing all of the data and/or collection of additional data if necessary, it=s determined that the levels of contaminants are low enough that it can be used onsite, then the materials will be used onsite as construction materials for the wetland project.

Finally, the lead-based paint was the other issue

that was identified, and lead-based paint is a potential concern at any of the structure due to the age of structures. We have not gone out and done lead-based paint sampling; however, due to the structures being built well before 1978 we assume that there=s definitely a potential for lead-based paint there. So lead-based paint chips in the soil around the buildings would be an issue.

We have a memorandum of agreement with the Coastal Conservancy that the Hamilton wetland restoration project will provide three feet of cover over those building footprints and six feet beyond the building footprint, and if it=s in an area where they cannot do that, then they will go ahead and scrape six inches of soil from the building footprint and with out six feet from the buildings, take the top six inches of soil that would be managed somewhere else onsite where they can provide some cover.

In summary, out of the alternatives, we had 19 sites that were for no further action; 15 sites, alternative 2, for excavation and offsite disposal; 34 sites on alternative 3, manage them in place or in situ with monitoring and maintenance for the army BRAC sites; and we have the two issues, the inboard areawide DDTs and the PAHs near the runway that will be addressed by alternative 4 through the Hamilton wetland restoration project. We also

have the three additional environmental issues that are outlined.

So all of these are covered in the ROD/RAP document. There's a recommendation on all of those sites.

The last slide that I'd like to show you is just the implementation schedule. And this also is directly out of the ROD/RAP, it's figure 4-1 in the ROD/RAP, and basically we are right in this area here, 2003, where we're looking at what Curtis had mentioned, the site cleanup requirements and things coming into place, property transfer, we're expecting September of this year. We're going to be getting into the design for the coastal saltmarsh activities and some of the design and potentially even excavation inboard in this time frame, moving on out through the next year into August >04.

Way out here all of this work is done, excavation that's necessary, all this excavation that's necessary, is all complete well before you get out here to the actual breach of the levee, which is expected to be a number of years out into the future. After breach of the levee, what we have showing here is monitoring that could run out 13 years of monitoring is already planned in the program, could extend beyond that. It depends on what that monitoring shows, and five-year reviews are shown out here into the

future.

So this is just a very general time line of how the parts of the puzzle fit together documentationwise.

With that I'd like to turn back over to Dean for the SEIR.

MR. AMUNDSON: How's that, okay.

As Lance and Curtis and Ed have all alluded to, the ROD/RAP is a federal-state process and the RAP portion of the document is a state action and approval of that is -- approval of that by the state is a discretionary action that is subject to the California Environmental Quality Act or CEQA, and so therefore we are preparing an environmental impact report to address that approval.

CEQA is primarily a process to inform the public and decision-makers about the potential environmental effects of the action. It also is a means by which you can mitigate the potential impacts. So it's a -- that's why we're here, actually, and we're here to talk to you, to get your input, and to include it in the consideration of the project approvals.

We are preparing a subsequent environmental impact report. This is subsequent to the 1998 Hamilton wetland restoration project EIR/EIS, which EIS is the federal environmental document. The ROD/RAP and the process by

which that=s been developed, the predecessor documents, have developed specific information about contamination issues at Hamilton and remedial solutions that represent substantial new information, and therefore we are analyzing the potential for impact from that activities.

And a key element of that is that the subsequent EIR is only looking at the potential impacts of the ROD/RAP; it doesn=t visit impacts of the wetland restoration project as a whole. Those are previously addressed, and we=re just doing a focused analysis on the ROD/RAP itself.

The project obviously Ed has covered. think that=s a -- it=s pretty clear what we=re analyzing and the purpose and need of the project=s primarily to remediate the site to levels that are suitable for the wetland restoration project. So I will move quickly into the environmental impact issues that are addressed in the EIR. We=ll try to make this brief so you can answer any questions you might have.

The SEIR -- did I say answer, sorry, ask any questions you might have.

The SEIR looks at a number of different environmental resource issues that were developed through the scoping process, the initial formulation of the extent and scope of the analysis. It looks at geology and soils,

water resources, public health, biological resources, land use, hazardous materials, substances, obviously, transportation, air quality, noise and cultural resources. And by looking at the activities associated with the ROD/RAP and the existing conditions on the site, the setting, the analysis attempts to evaluate the potential for significant environmental impacts as stated in the significant criteria developed in the document.

Significant impacts were identified for five resource areas, biological resources, transportation, air quality, noise and cultural resources. And probably the largest, most complicated is the biological resource issues.

Obviously there=s a lot of biological sensitivity out there with wetlands and with species that are sensitive and listed under either the federal or the state Endangered Species Acts or otherwise listed.

There=s different types of impacts. The first is primarily direct impacts due to loss of coastal saltmarsh habitat, and obviously excavation and disposal in that area, or excavation and offsite disposal of contamination issues in that area, would result in direct disturbance of the habitat. So mitigation measures are proposed in the EIR that address restoration of that site. The ROD/RAP actually includes attempting to minimize the extent of excavation

necessary out there, and also backfilling excavations with appropriate fill to allow natural revegetation.

The EIR also includes some active restoration if the natural restoration doesn't occur in a timely manner. Other potential biological impacts are related to species issues. There's a lot of potential for disturbance impact as a result of the remedial activities, proximity issues, noise issues to sensitive species in the coastal saltmarsh or also in the inboard area, and a number of mitigation measures are proposed that include preconstruction surveys to make sure species aren't there or activities actually to discourage species from being there.

And finally, you have potential impacts from direct mortality. Obviously activities out in the wetland are, you know, likely to encounter species, so similar types of mitigations are proposed whereby you ensure that the species are not present at the time you're doing the work. You have avoidance mechanisms, staying out of those areas during sensitive periods of time such as breeding or nesting seasons and actively ensuring that they're not there through preconstruction surveys.

Traffic impacts, obviously there's going to be a number of vehicle trips including both workers and materials being transported offsite, and those vehicles will need to

use the area roadways, in particular, the freeways, which as I'm sure all of you are aware operate at a -- at or near capacity or at or above capacity during the peak periods. So it's estimated in the EIR that there'll be approximately 28 to 32 trips per day during the peak period, and although this isn't a substantial number of trips, it does represent additional trips on roadways that're already at capacity.

And so the EIR identifies this as a significant but unmitigable impact. It is a short-term impact once the remediation's complete, those trips obviously go away.

Air quality and noise, both of the impacts associated with these resources are fundamentally related to the remedial activities. Obviously there's lots of vehicles, lots of ground-disturbing activities that tend to generate dust and noise. So for air quality, fugitive dust from excavation, from truck traffic, the EIR identifies a number of best management practices to minimize fugitive dust, watering the site, other controls like covering spoils piles, covering trucks, other measures as necessary to control dust emissions.

Noise similarly related to the type of equipment that would occur remediation activities, mitigation measures that have been identified to mitigate noise to a less-than-significant level are related to standard noise control

measures on equipment, mufflers and such, avoidance of sensitive areas during, you know, during non-peak hours, identifying hours of operation that are not as impacting.

Also if necessary, more extensive measures such as noise barriers and notification of public. A lot of the activities would occur, you know, well out in the property and removed from potential sensitive receptors, especially the residences along the southwestern side there.

So, you know, the noise effects from those would be fairly minimal, but some of the activities would occur closer and so those would be the ones that would require more sensitivity to the adjacent property owners.

Lastly, cultural resources, obviously anytime you have ground disturbance you have a potential to encounter any kind of buried deposits, whether they're human remains or archeological remains. So we have some standard mitigations that are included in most kinds of projects like this where if you encounter those types of resources you stop work until you characterize the resource better.

Also CEQA requires that a reasonable range of alternatives be considered in the process, and alternatives are obviously a fundamental part of all of the processes leading up to where we are now. There's been a number of previous environmental documents from the disposal and re-

use EISs originally done by the army for disposal, the property, to the Hamilton wetland restoration project, EIR/EIS, and those all dealt with different land use alternatives.

So for purposes of this document we're not looking at different land use alternatives; those have all been formulated through the previous documents and we're assuming that wetland restoration is the only land use alternative. There's no locational alternatives; we're clearly dealing with remediation of issues on one particular site and so we have no choice, we have to do it here.

The only remaining alternatives are remedial alternatives, and as Ed discussed in his presentation, that was a fundamental part of the ROD/RAP and the predecessor documents to the ROD/RAP, consideration of a number of different approaches at each of the sites of contamination.

The EIR does talk about some different applications of those on the property; however, most of those are not really viable alternatives, since they would either result in substantially greater impacts or they wouldn't -- they would preclude the fulfillment of the objectives of the wetland restoration project, both of which are reasons for exclusion from consideration.

So that's a very brief overview of the EIR and,

you know, I'm definitely available to answer any specific questions you might have about that. After the public comment period, we're obviously going to move forward with incorporating comments by the public into the draft document, and issuing a final. The final will then have to be certified by the Coastal Conservancy which is the lead agency for this document before it can proceed. Also, all of the lead responsible agencies will have to issue findings about the adequacy of the document for addressing significant impacts before they can issue project approval.

So before the ROD/RAP can be approved by DTSC and regional board they will have to issue findings based on the CEQA document.

So I guess at this point then we'd like to have a brief breakout session where we can just take discussions informally and answer various questions you might have about the ROD/RAP or the EIR. I also would remind you please sign in so that we can track everybody who's here and make sure they're on the mailing list, and just once -- and also if you do wish to speak tonight, please fill out a speaker card and give it to me so that I can call on you when we open the formal comment period which will be immediately after the breakout session, and there's also written comment forms if you prefer to just write your comments.

And, I'm sorry, did you have a question?

VOICE: You answered it.

MR. AMUNDSON: Okay.

SECOND VOICE: The question period, is that separate from the comment period?

MR. AMUNDSON: Yes. What we'd like to do is have just an informal period we can answer any of the questions you might have. But if you do have actual comments on the documents, I'd ask if you please save them for the formal comment period so we make sure and document them accurately and capture them because we may not capture your comments during informal discussions.

And also in commenting again please make sure and identify which document you're commenting on, whether it's the ROD/RAP or the EIR. And --

THIRD VOICE: I've changed my mind.

MR. AMUNDSON: Changed your mind about asking a question or you --

THIRD VOICE: Yes, I would like to hear other people's questions so can't you have the people ask questions -- public discussion -- there's not that many people here.

MR. AMUNDSON: Sure, we're flexible. I think we can accommodate anything. So that's fine.

MR. KELLER: Yes, we can accommodate that also. A lot of times some people come and they're not sure exactly, they know they've got a concern about a particular issue but they also have questions. We can answer those questions during this informal period and that will maybe even formulate the comments a little more solidly or that type thing also and so it helps that also.

What we have over here on the side on my left, your right, is a lot of the history on Hamilton, some of the older documents and that type of thing. Some people may be interested in looking at that. We have also available right up here the actual ROD/RAP document, the SEIR document, some of the materials that we talked about, also the feasibility study. We can show you how the data is presented and those types of things in those documents.

Over on the -- your left, we'll move the podium out of the way, and there's some figures of the wetland restoration project and the Coastal Conservancy, Tom Gandesbery here, will be able to answer questions that you might have on anything that goes beyond the ROD/RAP out there on the wetland project.

MR. GANDESBERY: Just wanted to mention, clarify, there's -- it's confusing -- there're several aspects of the corps involved here and then there are several EIRs.

There=s the 1998 EIR for the wetland project that the corps and conservancy authored and that was to get Congressional approval. I didn=t bring a copy of it.

Then last year we did another, a supplemental EIR, and we had hearings in this same room, and I have a copy, my own copy, if you want to look at that, and that=s what the graphic over here represents. That has not been approved by Congress yet, and that would create a 2600-acre wetland project including this airfield.

Tonight we have a third EIR which is a -- we call it the subsequent EIR, which is comparatively thinner and analyzes the cleanup plan that the army=s developed, the ROD/RAP. So there=s -- just wanted to make sure we=re --

SECOND VOICE: So if I have formal questions does that go against the comment period?

MR. KELLER: Formal questions can be asked during the comment period also. If you got a question you think everybody wants to hear, every -- that=s fine to have it during the comment period. What we do is offer this, you know, 10-15-minute --

MR. GANDESBERY: It=s just a stretch --

MR. KELLER: -- period to be --

MR. GANDESBERY: -- stretch break.

MR. KELLER: -- able to -- it=s a stretch break

but it's also a break to be able to come up and maybe get questions answered on things beyond what we're actually commenting on here tonight. Beyond the ROD/RAP document or the SEIR, if you're interested in something else, the people are here to be able to answer those types of questions.

SECOND VOICE: So -- start to ask questions like this or -- some of the questions I have here, they're general but they --

MR. KELLER: Well, what we're going to do right now is the court reporter will go off line and this will become an informal period. He'll come back on line in about 10 to 15 minutes and if you have a comment that you want to go on the record or question you have that wants to go on the record, we'll have a microphone that roves around at that point, we'll ask you to identify yourself for the record, ask your comments or your questions and that type of thing.

And so if you have something you want on the record, ask that in about 10 or 15 minutes; you can also ask it now also if you'd like but he's going to go off line as of now.

(Whereupon, a brief recess was taken.)

MR. AMUNDSON: We'll get started, but before we start the formal comment period, I'd like to give everybody

one more opportunity to ask any questions. I think it wasn't made adequately clear that once we start the formal comment period the intent is not to respond to all of your comments unless it's sort of a clarification-type answer. There's a lot of agencies involved here -- that too loud -- oh, sorry -- and so, and formulating the responses requires a lot of coordination between agencies and so the intent tonight is just to gather the comments for consideration.

So if anybody has any more questions before we open the comment period --

MS. BELSKY: Yes, this is Elena Belsky. I'm still having a series of questions.

Can somebody describe the extent of the pentachlorophenol contamination and show me on the map where that is and what will be remediated, because I'm finding hot spots, you know, all different little spots of that. So somebody describe the extent of that contamination and show me where on the map, please.

And that's one of about three.

MR. KELLER: The short answer to your question is yes and no. The -- and we show you on a map right now on what we have here, no. There were several compounds, the phenol and the pentachlorophenol, those were detected in the outfall drainage ditch. And the outfall drainage ditch is

slated for remediation, at least the -- let me just move this photo out a little bit, I can show you a little bit on this.

It was detected in the drainage ditch which runs on the outboard side of the levee along through here and out, and this whole segment of the ditch is proposed for excavation cleanup through there.

I don't have a map handy to show you those locations but that's where those datapoints are.

MS. BELSKY: Okay, actually I have the same question for the PCBs. Can you kind of point on the map and show the extent and where they will be remediated?

MR. KELLER: Sure, and one thing to remember, in the document we have a list of action goals also for all these different compounds. Just because something is detected at a site doesn't mean that it was chosen for excavation. It may be at a level, especially with PCBs, we have some detections of PCBs that were below those action goals. So those sites aren't suggested for removals or excavation at this time.

The areas that do have PCBs that we're looking at removals are related with the east levee construction debris disposal area, from my recollection. I can't remember, there might be one in the antenna debris area here, I

remember also there was a hit of PCBs in the antenna debris area, which is up in this northeastern corner. It=s actually on the outboard side of the levee.

Both of those sites are on the outboard side of the levee in the coastal saltmarsh area.

MS. BELSKY: Also, some of the neighbors were noticing that there=s a big sampling event that happened in March and I was wondering if you could say, tell us, what it was and what the results were?

MR. KELLER: Okay, the sampling that occurred this last March occurred over the entire airfield parcel here. That was conducted by the San Francisco district Corps of Engineers and the Hamilton wetland restoration project side of things, and that was sampling for -- or, inboard, areawide DDTs. That was the alternative 4 in the ROD/RAP, looked at the situation of how to handle inboard, areawide DDTs. The question that the wetland project had was they=re trying to get their arms around exactly what the extent of that problem is. And so they did a lot of sampling on about a 400-foot grid; 105 points were located, I believe there=re only four that they could not sample because of water, standing water, at the time. So I think they sampled at 101 different locations, depths down to two foot.

The report for that is due out here shortly, I

think, to go final. I just saw a draft, internal draft.

Do you know what the schedule is on that, Tom?

MR. GANDESBERY: Next couple weeks, I would think.

MR. KELLER: Next couple of weeks there should be something out on that. The basic thing that I've seen on it, in the top two feet, you basically get down to two feet and you don't have really any exceedances except, I think, one sample location, of the action goals. So the contamination is confined to the top couple of feet. Even down at six inches a majority of the site, 60, I think, of the samples, did not exceed action goals, even at six inches.

And so they were looking at how much soil they would have to move around on the site. But that should be available in next couple of weeks.

MS. BELSKY: Okay, I think I just have one more question. Oh, just working off of the final feasibility study charts for all the sampling, kind of matching, trying to match things up, why were there so many not-analyzed data and what does that mean?

MR. KELLER: Okay, what that means and I'm assuming you're talking coastal saltmarsh feasibility study, yes, okay, in the tables that we prepared for that document, we wanted to present all of the data. Some of the sites, as

I mentioned, may not have a particular contaminant of concern being a concern there.

For instance, some of the sites where we detected maybe only petroleum, we went back and we did additional sampling for petroleum only. So we didn't do a full suite after we've detected, you know, only a couple of compounds at a site when we do follow-on sampling.

The table, however, is a large matrix, and so it has all the different sample points listed and all of the different analytes that had been sampled for in the marsh in general. And so what you end up with is not all of the samples are sampled for every analyte out there. And those, it'll have an NA or a not-analyzed in the table.

MS, SALZMAN: During the presentation -- oh, my name is Barbara Salzman. During the presentation the statement was made that most of the alternatives were not viable and I was wondering, that sounds like some were but were rejected. So which ones were viable but were not chosen?

MR. KELLER: You would be talking about the SEIR part --

MS. SALZMAN: Yes, that's right.

MR. KELLER: -- of the presentation? All right.

MR. AMUNDSON: Yes, actually none of them were

considered viable. The CEQA requirements ask that when you look at alternatives, you look at alternatives that allow you to achieve your project objectives reasonably and also minimize environmental impacts. And so the alternatives that we considered in terms of remedial strategies, which, as I said in the presentation, it was narrowed down to different remedial approaches, essentially required larger amounts of ground disturbance and earth-moving and greater impact issues associated with that.

And, you know, therefore weren't alternatives that were considered better than the proposed project. Other alternatives were, you know, there's some consideration given to capping alternatives and more onsite management approaches that would have really impaired the ability of the site to be used as a wetland. You would have been very restricted in what you could have done with the site and therefore the project objectives of wetland restoration weren't achievable.

In addition, some of them have extraordinarily high costs associated with them. Excavating and disposing offsite all materials would be a terribly expensive proposition. So of the alternatives that were considered in the in -- that were discussed in the EIR, none of them are considered alternatives that would reasonably achieve the

project objectives.

MS. SALZMAN: So you know, so you should have said none of them were viable.

MR. AMUNDSON: Yes.

MS. SALZMAN: Okay, can you summarize what the extent of the remediation that will take place in the marsh, or are there areas that will be excavated?

MR. KELLER: Yes, the -- that would be in the ROD/RAP document. There=re several locations in the marsh.

One that I mentioned up here is we -- is known as the antenna debris area. It=s basically, it=s some piles that were garbage that were dumped there. We propose excavation there, we propose excavation outside the stormwater pump stations in the marsh plain itself, and the entire drainage ditch all the way down through here.

We also propose excavations for a couple of locations within the east levee construction debris disposal area. Also have excavation recommended down at the boat dock, one site within the channel itself and one site behind the bulkhead underneath the dock structure.

And also another excavation, there used to be a historic part of the outfall drainage ditch, there=s a couple locations along that ditch that we propose excavation. And an area here that=s known as area 14 --

it=s known as area 14 because it was the 14th site that was identified in the archive search report -- that we propose excavation at.

I believe that is it, so all of those sites we propose excavation in the project.

MS. SALZMAN: So how -- is that, like two acres or --

MR. KELLER: Total impact including around the -- we estimated some impact around the excavation itself for equipment moving and that type of thing, is estimated at about six acres of impact.

MS. SALZMAN: And how you going to mitigate for that?

MR. KELLER: This mitigation, this=ll be a short-term impact, and so those areas will regrow themselves, so it=s not a long-term loss of --

MS. SALZMAN: So you=re not --

MR. KELLER: -- habitat --

MS. SALZMAN: -- proposing any?

MR. KELLER: No. It=s not a long-term loss of habitat, but what Fish & Wildlife Service is looking at is that Hamilton in itself is one project. The wetland restoration inboard of that 500 or so acres inboard that will be wetland is acting as mitigation for that. Again,

it=s a short-term impact on the outboard side.

MS. SALZMAN: Okay, my last question is I understand that there=s a wetlands review group or something that -- and I=m interested in who=s included on that, if they had a part in developing this, or was this mostly or only agencies that developed your --

MR. KELLER: I=m not aware of a wetlands -- Tom, are you aware of a wetlands design group or development group?

MR. GANDESBERY: Is this the nascent group that the agencies are getting together? What is that?

MS. SALZMAN: I don=t know, I --

MR. GANDESBERY: You don=t know?

MS. SALZMAN: -- someone just mentioned it to me here that someone was on it here.

MR. GANDESBERY: Oh, I=m -- I --

VOICES: (Inaudible.)

MS. SALZMAN: Maybe that=s it, yes.

MR. GANDESBERY: Oh, the restoration advisory board -- there=s so many ways to say restoration, means so many things.

MR. KELLER: Yes, the restoration advisory board is not the wetland restoration, it is environmental remediation restoration. The restoration advisory board

meets quarterly right now. The next meeting is July 30th, and we meet and it=s an opportunity, it=s a forum for the public and the regulators to converse back and forth on issues and things surrounding the environmental remediation of the project.

It includes not only, I=ll mention, not only the army BRAC, also includes the navy BRAC properties and the FUDS properties such as the landfill and north antenna field.

MR. McMAHAN: My name is Lance McMahan. I work for DTSC. And I did notice something in the answer that Ed gave to for areas that are scheduled for remediation in the coastal saltmarsh, that there is one area that got left off, and I think that was just an oversight. The former sewage treatment plant outfall goes out to the bay and that area=s slated for remediation, and I=ll also point out that there is a difference in the figures between the feasibility study and the ROD/RAP. I believe the ROD/RAP is correct in showing that area=s slated for remediation; I believe the feasibility study shows that it isn=t.

So the feasibility study would be in error.

MS. SALZMAN: What was found there?

MR. GANDESBERY: Mercury, primarily.

MR. KELLER: Mercury and silver were the primary

concern out there, I think silver was also elevated.

Along with that, what we propose to do is to remove that entire pipeline. It's an -- it's -- contains asbestos in the pipeline material itself. And so what we're proposing to do is actually to remove the 400-and-some-odd feet of pipeline also.

MR. AMUNDSON: Any more questions or should we open the formal comment period?

MS. BELSKY: One I forgot to ask. I heard a new definition tonight and I would love an explanation. I've been hearing army civil works project or collaboration versus army BRAC cleanup, remediation; can you tell me the difference and what the army civil works exactly is?

MR. KELLER: Yes. The Hamilton wetland restoration project is a civil works project that's been authorized by Congress. The funding for that comes out of a different funding stream than the army BRAC funding and cleanup come from, and we operate under different authorities. And so, and the implementation of the ROD/RAP, you will have two different funding streams, one being army BRAC taking care of all of the sites that are listed in the ROD/RAP as army BRAC sites, and through the civil works project, the Hamilton wetland restoration project itself, the civil works program will be taking care of the

installationwide DDTs and those PAHs adjacent to the runway.

And it=s listed that way in the document, and that=s where alternative 3 and 4 come in. One of them is set up for the army BRAC sites, one of them is set up for the civil works projects sites or issues.

MR. POLSON: And so just to give you one further clarification on the US Army Corps of Engineers, what you=re hearing is the US Army Corps of Engineers civil works project, and the US Army Corps of Engineers has multiple missions and one of the corps=s missions is civil works that includes navigation, flood control and restoration.

And another of the Army Corps of Engineers, US Army Corps of Engineers, missions includes military support, and so you hear about the Sacramento district, US Army Corps of Engineers, working with the BRAC program. That=s the military support portion. And the San Francisco district of the US Army Corps of Engineers has the Hamilton wetland restoration project, a civil works project.

MR. AMUNDSON: Any more questions?

Okay, well, let=s move into the comment period then. Again, I=d like to remind you, if you can, please identify which document you=re commenting on. If you=re interested in the remedial alternatives in the ROD/RAP, please indicate that; if you=re interested in the

environmental concerns, please comment on the EIR.

And at this point I have two speaker cards; is there anybody else who -- okay.

Okay, and the first card I have is Elena Belsky. Do you have any additional --

MS. BELSKY: Actually -- all mine --

MR. AMUNDSON: In the question-and-answer -- well, that was quick and easy then, okay.

Grant Davis.

MR. DAVIS: Thanks a lot. I wanted to come here tonight. I'm the executive director of a group called the Bay Institute of San Francisco. We've been involved on and supporting this wetland restoration project for many years.

We moved our offices recently up to Hamilton in building 500 and specifically to be involved in making sure that there's a long-term wetland restoration project carried out here successfully.

And I really want to compliment the agencies that are involved with coming up with a strategy to move this forward. We feel that this is a project that's nationally significant, a project that's taken many, many years to come to fruition, and I would view this tonight as another chapter in the Hamilton saga.

There's a lot of affordable housing and other

units that are already been -- that have been built. The hangars are viable commercial space, and years ago as part of the BRAC process the community came together with a conceptual plan that you're in part implementing tonight.

From the Bay Institute's point of view, while we recognize there's a number of environmental issues and concerns that your remediation plan is addressing, we're also mindful of how this fits in the context. We run a program with the Coastal Conservancy and the Army Corps that was mentioned earlier in terms of the wetland restoration opportunities for San Pablo bay. And what I think you're doing is setting up an early transfer from the federal government to the state and that's something we wholeheartedly support to move the project out and continue seeking broad public funding on the federal level through the different processes to assist in the restoration effort here.

And from the Bay Institute's point of view we're particularly anxious and supportive of the effort right now, taking advantage of the Bel Marin Keys unit 5 parcel and the planning process, and that was something that we had hoped for many years ago, and I'm delighted to see that that's actually in the works. And we, for various reasons, are now able to take advantage of planning horizons and what we're

learning from the science of ecosystem restoration to plan this accordingly.

So again, having the regional board step forward as a long-term partner on this on the local level we think is a really productive step, and I applaud the Coastal Conservancy for providing the leadership to keep this project on track, and for the corps moving along through its own process to ultimately transfer this site.

So it=s really here to say thank you for the effort to date and continue the great work.

MR. AMUNDSON: Thanks.

Marucia Britto.

MS. BRITTO: Hi, my name is Marucia Britto, and I am a Hamilton resident, and I=m also community representative at the Hamilton RAB. I am also very excited about having a habitat restoration right on the other side of the levee from my house. I hope the mosquitoes won=t eat me alive, but I think it=s a very exciting project, to be able to use dredged materials in a beneficial way in the bay area in such a big way.

I have one concern and it=s related to the ROD/RAP which says that some contamination will be managed onsite beneath three feet of stable cover. I would like to know how can we be assured that the cover will be stable and how

will that be monitored and by whom, which agency.

MR. KELLER: I can actually answer a little bit of that. We'll have a formal response, of course.

The monitoring that I had mentioned, long-term monitoring, once the levee breach takes place, the Hamilton wetland restoration project in their authorization has 13 years of monitoring how the wetland develops. If for any reason the wetland is not developing in a way that we believe or had planned it to develop, such as having a channel start to develop somewhere where we didn't think it was going to, or that type of thing, there's an adaptive management phase of that whole project.

The hope going in is that we will have removed any contamination in the area where you'll have the deepest channels on the site, so that you won't have any need for adaptive management down the road. The places where you'll see the alternatives for leaving contamination under three feet of cover for most of the sites are around the perimeter of the sites where you would have very little wave action, very little tidal energy, very low risk of having any kind of major channels develop there.

And so it's not the right solution for all locations on the site, but we think it is a good solution for some of the locations on the site.

MS. BRITTO: Is it correct to assume that the areas that have contamination, they will already have three feet of cover before we start filling in the area for habitat?

MR. KELLER: It will have -- the requirement is to have the three feet of material in place prior to levee breach.

MS. BRITTO: Okay.

MR. KELLER: And that that three feet must be maintained over the life of the wetland. Okay, now as I mentioned, most of the areas on the site will actually have much more than three feet of fill on it, because of the subsidence of the land, you're going to have more like 10 feet of fill over many areas of the site. And that will be monitored, how the wetland develops, to make sure that something is not happening that we did not plan.

MS. BRITTO: And who is going to monitor it?

MR. KELLER: It'll be mostly the Hamilton wetland restoration project responsibility for monitoring how the wetland overall is developing. In conjunction with that, if we have particular sites that were army BRAC responsibility where we need to monitor something on that, what we hope to do is to add to their monitoring program and provide the funding to add to the monitoring program to oversee

monitoring for those locations instead of having two separate monitoring efforts occurring, we=d rather see one coordinated efforts versus two separate efforts.

That extends for 13 years out into the future past levee breach. After the 13-year mark, for the army BRAC sites, the army is still responsible for monitoring. After that 13-year point in the future for the civil works side of things, then the Coastal Conservancy and the state would pick up monitoring requirements.

MS. BRITTO: Okay, thank you.

MR. AMUNDSON: Any additional questions?

MR. BERSON: My name is Alan Berson. I live in Bayside at Hamilton.

It was pointed out to me in the informal period that I -- that the site evaluation currently says there are no current or anticipated unacceptable human health risks, and so that all we=ve been talking about is to provide an environment that=s safe for the birds and the bees.

Now I wonder if you could tell me if there are any plans in place that have criteria already established for monitoring whether or not this whole effort has been successful, that is, not knowing anything about this area, presumably there are some animal life and plant life that are desirable to get back into this environment.

So again my question is have criteria been established by one of the agencies, presumably the Coastal Conservancy, for establishing whether or not this has been successful. For example, is there a threshold, you know, X animals alive after Y years.

MR. GANDESBERY: Yes. There -- in the regulatory agencies this project will -- the civil works program is going to at some point in the near future apply for permits from the water board and other agencies for placing the dredged material on the site. And at that point they'll make a formal decision about the monitoring program. But we have sort of a generic program already designed and it's based on other monitoring that we've done on other projects, other sponsors have done.

And typically they look at -- and you can make use of very efficiently, cost-effectively, of aerial photos, interpretation of those for percent cover of plant, and mainly in the tidal marsh, say, it would be pickleweed. So they look for, after X number of years, how much pickleweed do you have.

On the -- and also on the physical side, looking at the amount of accretion of sediment that's come in on the tides, that can be measured very exactly. We'll be looking at the cross-sections in some of these larger channels to

see how far down, what the dimensions are after a few years.

And typically the monitoring starts out very aggressively on maybe a yearly scale, and then goes to every three years, every -- once every five years, you know, if things work out.

Also we expect to see some chemical monitoring in terms of contaminants and water quality, and we'll be looking at possibly putting some monitoring out that does that, and then just so we can be assured that -- and also be nice to be able to compare the water quality in this wetland to the rest of the bay and to other similar marshes where there's monitoring.

And there is a large monitoring program already in place throughout the bay area, a regional monitoring program where they look at toxic effects and chemical levels in fish. They were involved in gathering the data for these fish advisories about, you know, that fish in the bay are hazardous to people, tell us not to eat too many fish. so that program, we could make use of those methods and those protocols and do something similar or, you know, or tag onto their program and have them come look at our marsh once or twice a year.

In fact, now that I think of it, the Army Corps has an experiment station in Mississippi. They've come out,

they're very interested in doing a study of mercury contamination. That's a regional problem in San Francisco bay. They want to use this as a natural experiment, because they can look at, you know, what it looks like before and during and after the restoration project. So there's going to be additional work on mercury out here.

MR. BERSON: Thank you.

MR. AMUNDSON: Anyone else have a comment?

MR. McNICHOLAS: Right here, just, oh, get the mike. Question is we're talking about all the future, 20-some years in the future. Is there anything set in plans or concrete or Congressional or whatever for that these things will come to be or are they all suppositions that they'll come, they may happen, or they just, as I say, may happen, vaporware?

MR. AMUNDSON: Can you say your name for the record.

MR. McNICHOLAS: Bill McNicholas. And I'm a new member to the RAB.

MR. GANDESBERY: I mentioned earlier we had a 1998 EIR, EIS/EIR, and that looked at restoring the army BRAC and this north antenna field which is former army property that's now owned by the state lands commission. This became authorized, I mean, the reason we did the restoration

planning ahead of the cleanup plan which is what we're talking about tonight is that we needed to have that study done in place to get Congressional approval.

So Congress approved this in 1999 and they funded the corps of engineers shortly thereafter, I think in the year '99 budget, to start work. And so that the conservancy's a local sponsor to the corps. We provide 25 percent of the cost plus take care of all the lands, we need to acquire the land, the easements. And there's a power line and there's a sewer line here, and the rights-of-way, and we just have a little right-of-way over here.

So we have to take care of some of the local details. That is the way I like to look at it, is the Congress has ordered the corps to build it. When we were in that planning stage, we realized there's an additional piece here of land that had been slated for more development, similar to those homes in this area, had not gone well. The landowner was interested in selling it, so we acquired this in the year 2001.

This piece, the Bel Marin Keys unit 5 piece, has not been authorized by Congress. We have wording in pending legislation to add it, but that has not been blessed. And so as far as we could go with the planning process we've done. We've just completed the EIR, supplemental EIR and

that, but that=s basically on hold until Congress approves it.

MS. SALZMAN: Oh, I just wanted to add Marin Audubon=s voice to what Grant said earlier in support of restoring marsh here. It=s a really significant and regionally and nationwide project and we fought off development for the last 20 years on these two sites, and so to have this accomplished will be truly a magnificent occurrence. So we look forward to it. That doesn=t mean that you shouldn=t be doing a good job cleaning up and ensuring that the contaminants are addressed and properly taken care of, but it=s a great thing you=re doing, and just do it right, and stick with it.

MR. DAVIS: I wanted to add one last comment. This is Grant Davis again. And, Barbara, we=re obviously in the same boat here.

I think for the community and for Marin county and the city of Novato, I do think that there is still a desire to state for the record that a long-term monitoring program be put in place, and that it be as robust as possible. I=ve seen large projects nationwide in which because this is a new science and ecosystem restoration is evolving, we=ve seen from the Sonoma baylands project that we=ve learned from that dredging disposal opportunity to inform the

Hamilton wetland restoration project that if there are doubts, let's err on the side of providing more long-term adaptive management and monitoring on this particular project, and I was delighted to hear Tom say that the corps might have an interest in the mercury piece, because we can learn a lot through this.

And so that's really the opportunity we don't want to lose, is to take the interested regulatory agencies and the restoration scientists and take advantage of what we do know, build off the learning lessons off of this, and so to do that we would want to have a monitoring component that's as thorough as possible and really learn from that.

MR. AMUNDSON: Any additional comments?

Okay, well, I guess that concludes the comment period.

I'd like to remind everybody that the comment period for both the ROD/RAP and the EIR are still open until the 21st of July. So if you have comments or if your friends have comments, anybody you know, please get them to us by that date. The addresses for submitting comments are provided on the fact sheets at the back. If you have comments on the ROD/RAP, they go to Ed. If you have comments on the EIR, to Tom.

And if also if you can submit them electronically,

of course, that=s far more convenient for us, obviously, any way you want to submit them. And I think that=s it, but, Lance, you wanted to --

MR. McMAHAN: Comments can also be directed to the department or to the water board.

MR. AMUNDSON: Okay, comments can also be directed to the Department of Toxic Substances Control or the Regional Water Quality Control Board. I=ll just point out Tom is a sort of central clearinghouse for comments on one particular document and Ed for the ROD/RAP, but, yes, you can submit them to DTSC or RWQCB as well.

And so on behalf of everyone who=s involved with this and who=s here tonight, I want to thank you all for coming and taking time off your schedule, and stay involved, and thanks a lot.

(Whereupon, at 9:04 p.m., the public hearing in the above-entitled matter was concluded.)

C E R T I F I C A T E

This is to certify that the attached proceedings before the US Department of the Army, Base Realignment and Closure Program, California Department of Toxic Substances Control, San Francisco Regional Water Quality Control Board, and California State Coastal Conservancy, in the matter of Hamilton Army Airfield Main Airfield Parcel Record of Decision/Remedial Action Plan and Subsequent Environmental Impact Report, were held on Wednesday, July 9, 2003, in Novato, California, as therein appears, and that this is the original transcript thereof for the files of the agencies.

KENT ANDREWS

Official Reporter

Date: