APPENDIX C

Responsiveness Summary

Public Meeting Comments - Main Airfield Parcel ROD/RAP and The Subsequent Environmental Impact Report
Hamilton Army Airfield
May 2003
Responses to Comments

No.	Comments	Responses
Written Comments Received During Public Meeting on July 9, 2003		
Bill McNicholas, RAB Member		
1.	Please proved RAB new member with a copy of CD of all related documents. Down-load is a pain and crashes. Need a complete package to down-load print - "not piece meal!"	Each new RAB member has been provided the requested CD.
2.	Need a list of key players and agencies involved.	Provided together with the CD.
Verbal Comments Received During Public Meeting on July 9, 2003:		
Ms. Elena Belsky		
1.	Please 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.	Pentachlorophenol was detected in the drainage ditch which runs on the outboard side of the levee. This whole segment of the ditch is proposed for excavation cleanup.
2.	I have the same question for the PCBs. Can you point on the map and show the extent and where they will be remediated?	The ROD/RAP lists of action goals for different compounds. Just because something is detected at a site doesn't mean that it was chosen for excavation. Contaminants could be detected at levels, especially with 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 proposed for removals are the East Levee Construction Debris Disposal Area, Antenna Debris Disposal Area, High Marsh Non-Channel Cut Area and Outfall

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		Drainage Ditch. All of those sites are on the outboard side of the levee in the coastal salt marsh area.
3.	Also, some of the neighbors were noticing a big sampling event was conducted in March – what were the results?	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 Inboard, Area-wide DDTs. That was the alternative 4 in the ROD/RAP, looked at the situation of how to handle Inboard Area-wide DDTs. The question that the wetland project was trying to answer was 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. Four points could not be sampled because of standing water at the time. Soil was sampled at 101 different locations, depths down to two foot.
4.	Working off of the final feasibility study charts for all the sampling, why were there so many not-analyzed data and what does that mean?	In the tables prepared for that document, the Army wanted to present all of the data. However, some of the sites, may not have a particular contaminant of concern being a concern there. For instance, some of the sites where only petroleum was detected, the Army went back and we did additional sampling for petroleum only. So the Army did not do a full suite after specific compounds of possible concern were identified. 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, not all of the samples are sampled for every analyte out there. The

No.	Comments	Responses
		NA is provided when the compound was not-analyzed.
Ms. Salzman		
1.	Can you summarize the extent of the remediation that will take place in the marsh, or are there areas that will be excavated?	The ROD/RAP documents the areas of remediation. There are several locations in the marsh that will be remediated. One is known as the antenna debris area. It is basically, piles of garbage that were dumped there. We also 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 is a couple locations along that ditch that we propose excavation. An area known as Area 14 (because it was the 14th site that was identified in the archive search report) is also proposed for excavation. The outfall for the former sewage treatment plant is also proposed for excavation.

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2.	How many acres will be impacted in the marsh and how you going to mitigate for that?	Total impact is estimated at approximately 6 acres. Some impact around the excavation itself was included for equipment moving and that type of thing, is estimated at about 6 acres of impact. The impact of the excavation will be a short-term impact, and so those areas will re-grow themselves. Long-term loss of habitat is not expected. Fish & Wildlife Service is looking at Hamilton as a single project. The wetland restoration inboard will create 500 or so acres of wetland acting as mitigation.
3.	Is there a wetlands review group or something like that, who is included and did they a part in developing this, or was it mostly or only agencies that developed the ROD/RAP	There is a Restoration Advisory Board, but it is not related to the wetland restoration but rather to the environmental remediation restoration. The restoration advisory board meets quarterly right now. The RAB provides an opportunity and forum for the public and the regulators to converse back and forth on issues and things surrounding the environmental remediation of the project.
Ms. Salzman		
1	What was found at the Former Sewage Treatment Plant Outfall?	Mercury and silver were the primary concern. Along with the proposed excavation, the pipeline will be removed.
Ms. Belsky		
1.	What is the difference between the army civil works project versus army BRAC cleanup remediation; and what specifically is the army civil works.	The Hamilton wetland restoration project is a civil works project that has 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

No.	Comments	Responses
		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 installation-wide DDTs and those PAHs adjacent to the runway. Alternative 3 was set up for the army BRAC sites, Alternative 4 was set up for the civil works projects sites or issues.
Grant Davis		
1.	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. 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. And what I think you're doing is setting up an early transfer from the federal	Thank You.

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	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. 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 its actually in the works. For various reasons, we are now able to take advantage of planning horizons and what we're learning from the science of ecosystem restoration to plan this accordingly. 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. Thank you for the effort to date and continue the great work.	
2.	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	See response to Mr. Berson's comment below to address comments on long-term monitoring and adaptive management. We agree that this project will be a tremendous learning opportunity for the local community, government sponsors and regulatory agencies.

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	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 is 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 is as thorough as possible and really learn from that.	
Marucia Britto		
1.	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 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 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.	The long-term monitoring will begin 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 that was not anticipated, there is an adaptive management phase of that whole project. The plan is to remove any contamination in the area where the deepest channels on the site will be, so that there isn't a need for adaptive management down the road. The places where alternatives allow for leaving contamination under three feet of

No.	Comments	Responses
		cover for most of the sites are around the perimeter of the sites where the team expects there will be little wave action, very little tidal energy, very low risk of having any kind of major channels develop there.
2.	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?	The requirement is to have the three feet of material in place prior to levee breach. The three feet must be maintained over the life of the wetland. 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, the project is more likely to have 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.
3.	And who is going to monitor it?	The Hamilton wetland restoration project has the primary 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, the Army hopes to add to the HWRP 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. One coordinated effort is likely to be more effective than two separate efforts. The monitoring 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. Monitoring consists of CERCLA five-year reviews. After that 13-year point in the future for the civil works side of things, then the Coastal

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		Conservancy and the state would pick up monitoring requirements.
Alan Berson		
1.	The site evaluation currently says there are no current or anticipated unacceptable human health risks, and so we've been talking about providing an environment that's safe for the birds and the bees. 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. 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.	Yes, plans are in place. 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 a generic program has already been designed and it's based on other monitoring that we've done on other projects, other sponsors have done. Typical monitoring programs cost-effectively interpret aerial photos for percent of plant cover (in the tidal marsh this would be pickleweed). So they look for, after some set number of years, how much pickleweed is present. Other physical features can be monitored as well including the amount of accretion of sediment that has come in on the tides - which can be measured very exactly. The monitoring program will look at cross-sections in some of these larger channels to measure the dimensions are after a few years. Typically the monitoring starts out very aggressively on a yearly scale, and then goes to every three years, and to once every five years. Some chemical monitoring will be likely in terms of contaminants and water quality. This type of monitoring will also allow comparison of the water quality in the wetland to the rest of the bay and to other similar marshes where there is

No.	Comments	Responses
		monitoring.
Mr. McNicholas		
1.	The activities will all take place in the future. Is there anything set in plans or concrete that these things will come to be or are they all suppositions that they'l come, they may happen, or might they just vaporize.	The reason the wetland restoration planning was completed ahead of the cleanup planning, is that the wetland restoration planning had to be in place to get Congressional approval. Congress approved the wetland restoration plan for the main airfield, coastal salt marsh and north antenna field areas in 1999 and they thereafter provided initial funding the Corps of Engineers thereafter to start work. The State Coastal Conservancy is a local sponsor to the Corps. Their roll is to provide 25 percent of the cost plus acquire the land and the easements and take care of the land. During the planning stage, the team realized there was an additional piece of land (Bel Marin Keys V) that had been slated for more development, similar to existing homes in the area was having trouble. The landowner was interested in selling it, so the State Coastal Conservancy acquired it in 2001. Expansion of the HWRP to include the BMK V parcel has not been authorized by Congress at this time.
Ms. Salzman		
1.	This is 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	Thank you.

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	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.	

Friends of Novato Creek Comments on Record of Decision/Remedial Action Plan
Hamilton Army Airfield
May 2003
Responses to Comments

No.	Comments	Responses
Sue Lattanzio and Elena Belsky, Friends of Novato Creek, Dated July 21, 2003		
General Comments:		
1.	Friends of Novato Creek appreciates the opportunity to comment on the following documents for the Main Airfield Parcel, Hamilton Army Airfield: Coastal Salt Marsh Final Feasibility Study; Inboard Area Final Feasibility Study: Record of Decision/Remedial Action Plan; Draft Supplemental Environmental Impact Report; Finding of Suitability for Early Transfer; and draft Site Cleanup Requirements.	DTSC, RWQCB and the Army appreciate your comments. Our responses to your specific comments are provided below.
2.	Overall, it is unclear whether the proposed actions will be protective of public health and the environment or, for that matter, exactly what is proposed. For example, historic, readily available analytical data for the Coastal Salt Marsh were ignored when establishing the proposed cleanup area, resulting in a significant understatement of the area requiring remediation. We are also concerned that data are being withheld from public review. The Army has indicated they collected DDT samples throughout the Inboard Area in March 2003. Even a slow laboratory would have provided validated data within two months, in time for incorporation into the ROD/RAP. Four months have elapsed and the data have not even been made available for public review; we believe this data should have been made available two months ago, and included in the administrative record. Finally, the proposed remedial alternatives themselves are defined in such a manner as to make it possible to change the remedial actions without benefit of public review. This is not consistent with	The Army, DTSC and the RWQCB believe the proposed remedial actions will be protective of human health and the environment. The feasibility studies have evaluated the protectiveness of the proposed remedies. And the Army will be responsible for evaluating the remedial action effectiveness of remedies once completed. We have used all of the data gathered to date in the CSM in the ROD/RAP evaluation. Our response to your concern regarding specific sample locations is provided below in response to specific comments. Final excavation areas in the CSM will be determined based on additional data collection (pre- and/or post- excavation confirmation sampling) and the remedial design. The action goals selected for the marsh are fairly stringent, representing background, ERLs or NOAELs. These action goals will be implemented on an area-wide basis. The data collected in March 2003 is not being withheld from

No.	Comments	Responses
	CERCLA, and entirely unacceptable.	public review. The data were collected by the Army Civil Works Program to be used in the remedial design phase of the project, to assist in developing a soil management plan. The data were not collected to make decisions about what remedy should be proposed in the ROD/RAP, but rather to inform future actions post remedy selection. Yes laboratories generally provide data within 1 - 2 months, however, the data must undergo validation and review prior to use in any study or evaluation (this process typically takes 1-2 months depending upon the amount of data collected). Once the data is evaluated, reports can be prepared and properly reviewed prior to being finalized. This process can take several months. The Army has prepared a draft report dated July 15, 2003, that contains the information on the March 2003 DDT sampling. The report is currently undergoing regulatory review and expected to be finalized soon. For issues related to consistency with CERCLA - please see response to specific Comment 13
3.	As the decision-making process is based on numerous documents, information and findings, we have included references and questions originally brought up regarding the September 2001 Draft ROD/RAP which were not adequately answered in the Army's responses to our October 15, 2001 comments. We do not feel that the answers provided were adequate, nor did they contain information or references specific enough for us to research. The Army also failed to investigate the sources of information we provided regarding the Historic Flooding and toxics fate and transport issue. Overall, we feel that the Army was unresponsive to the majority of our comments, providing only token answers or generalizations that were wholly inadequate. We therefore include as an attachment, our comments from October 15,2001, on the September 2001 Draft ROD/RAP, and request the subject documents be revised to address those concerns.	The Inboard Area ROD/RAP has been superseded by the Main Airfield Parcel ROD/RAP dated May 2003. An effort was made to address your previous comments while developing this version of the ROD/RAP. Responses to specific comments on the current document are provided below.

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4.	Due to the concurrent release of at least six documents for public comment, with concurrent comment periods, we were unable to review and cross-reference these highly technical documents to our satisfaction. In the future, such multiple releases of documents within a short time period should be avoided as it does not afford the public adequate opportunity for review nor does it serve to encourage public participation. We therefore reserve the right to provide supplemental comments at a later date.	The Coastal Salt Marsh Final Focused Feasibility Study was presented in June 2003. The Inboard Area Final Feasibility Study was presented in August 2001. The Record of Decision/Remedial Action Plan was presented in May 2003. The Draft Supplemental Environmental Impact Report was presented in June 2003. The Finding of Suitability for Early Transfer was presented in June 2003. The draft Site Cleanup Requirements were also made available in June 2003. It is standard protocol for the state to provide a CEQA document for concurrent review with a ROD/RAP. Both of these documents pertain to the same actions and therefore concurrent public comment is preferable. The Army did release the Finding of Suitability for Early Transfer (FOSET) for the main airfield parcel for public comment concurrently with the ROD/RAP due to scheduling constraints. As long as scheduling allows we will try to limit the number of documents out for public comment at the same time. All comments received after the official public comment period, prior to finalization, will be considered but may not be responded to in writing.
Specific Comments:		
1.	**Discrepancies in Data Reporting** - Such discrepancies that are occurring with seeming regularity regarding data reporting, cast doubt on the validity of how other sampling data is being handled and reported. • **Duplicate Sample Reporting:** the Army appears to be using the lower value for a duplicate sample, and fails to report or use the higher value. Examples: East Levee Construction Debris Disposal Area duplicate sample for PCB's - reported in CSM FFS was 167.6ppb yet the duplicate sample was 184.9ppb. And in the CSM FFS table 6.1 data point CSM-ODD-SD-330 was listed at 3.2 mg/kg with the duplicate sample in the	**Duplicate Sample Reporting:** The Army agrees that where there are duplicate data samples, the higher one should be used. Final evaluation of the boundaries for excavation in the Coastal Salt Marsh will be conducted as part of the remedial design. In the two examples presented by the reviewers, these differences in data reporting did not impact the remedy selected in the ROD/RAP or the COPC selection. **Not Analyzed Discrepancies:**

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	December 2000 CSM data report the duplicate sample was listed at 46.38 mg/kg. The higher number of a duplicate sample should always be used and reported. • **"Not Analyzed" Discrepancies** - Errors and omissions in data regarding the Not Analyzed (N/A) designation call into question entire tables with data points listing multiple N/A. Which sampling points and compounds were analyzed, yet rejected - but with no designation as to WHY it was rejected? Example: The April 1999 CRI lists sample point TWA-SD-17 showing DDT's at 130ppm, but the data was rejected. Nowhere does the CRI indicate why the data was rejected. In the CSM FFS, the same sample was listed as not having been tested for DDT's at all.	Where data were rejected, they are considered as not useable for evaluating a site. We agree that designating TWA-SD-17 for surface sediments as not analyzed would be incorrect. We have not found any such designation. The data for this sample and depth were rejected during data validation in 1995 and were consistently reported as such. Rejected data would not have been considered in the FFS and therefore would not be listed. In this particular instance, validated results for DDTs were reported at other depths at that sample location. The lack of valid data at the surface has no impact on the remedy selected or the COPCs for the site. This sample location is within the area proposed for remediation. In general for samples designated as N/A (Not Analyzed), in all instances that we are aware of, a specific class of analyses were not performed for that sample.
2.	**A Failsafe confirmation and comprehensive sampling plan** needs to be instituted to ensure the quality of all remediation and wetlands construction in regards to remaining toxics prior to opening the project to tidal action. If action and protection goals have not been met, the wetlands project should not be opened to tidal action until or unless they are met. Periodic and regular monitoring should be done throughout the lifetime of the wetlands project, with contingency plans and actions pre-determined if monitoring should show releases of contamination or compromised stability of the cover and fill. ***Please create a confirmation-sampling plan as outlined above.***	The ROD/RAP requires that a confirmation sampling plan and monitoring plan be prepared for sites where excavation will take place (Alternative 2). The Hamilton Wetlands Restoration Project will develop an adaptive management plan, which will apply to construction activities and a monitoring time frame of 13 years post levee breach. The confirmation sampling plan will be prepared by the Army as an integral part of the Remedial Design which details specific actions to be taken in the actual implementation of the ROD/RAP.
3.	**Moving Hazardous Waste** - All hazardous wastes that are moved, whether on or off the property, must comply with the substantive requirements of Title 27. There is no difference between wastes being moved during the HWRP implementation and moving wastes that are identified as "BRAC sites." The ROD/RAP should not treat these	We agree there is no difference between hazardous waste being moved. All hazardous waste that is removed from the site will be handled in accordance with appropriate laws and regulations. If contaminated soil is classified as hazardous waste, the BRAC program will remove the contaminated soil.

No.	Comments	Responses
	events differently, as does the CEQA analysis - both of which are incorrect. *Please correct these errors in the subject documents.*	No soil, classified as hazardous waste, will be left on site. There is no plan for the HWRP to move hazardous wastes onsite. The HWRP is only allowed to manage the PAHs along the runway and the Inboard Are-wide DDTs less than 1 ppm onsite. Soils with these contaminants at these concentrations are not classified as hazardous wastes. Title 27 requirements will be complied with, where appropriate.
4.	**ASR Sites** - No Alternatives have been identified or selected for these sites (p4.2). As such, it would appear that an additional ROD/RAP is needed to select the appropriate remedy at a later date. The FOSET does not mention a procedure for addressing this omission. *Please correct these errors in the subject documents*	Additional investigation will be conducted at the Archive Search Report Sites. If remedial action is required at the Archive Search Report sites, the ROD/RAP establishes that Alternative 2 or 3 would be used. The ASR sites are not expected to require remedies outside of those that are evaluated and proposed in the ROD/RAP. This agreement in the ROD/RAP will enable the project to protect human health and the environment and meet the requirements of the wetland restoration program. Implementation of the ROD/RAP will be overseen by the RWQCB through the Site Cleanup Requirements. Further investigation of the ASR sites is addressed in the Regional Board's order. No modification is necessary to the FOSET.
5.	**Pentachlorophenol (PCP) and the associated potential for Dioxin Contamination in the CSM** - given the limited sampling of PCP, and even less for Dioxins, the high sample results in the CSM are of great concern. Especially since PCP has a shorter half-life than Dioxin, and therefore must have been at extremely high concentrations initially. The potential for Dioxins occurring at a high level under this scenario is real. ***Additional testing for PCP's and dioxins are indicated in the CSM-please revise subject documents to reflect this probability and begin a sampling program.***	The site that identified PCP as a chemical of concern (the ODD) was not sampled for dioxin, however it is proposed for excavation. Pre and post excavation sampling requirements will be identified in the Remedial Design documents. No separate sampling program is needed to establish a remedy.

No.	Comments	Responses
6.	**Inboard Cover and Fill** - Is this a performance standard or a required remedial action? • The three feet of cover is not a "remedy" - it is described as a "performance standard." Contaminated areas that lack the three foot cover should be required to have it installed. All areas would then have an Institutional Control requiring that the cover be maintained in perpetuity. Any maps need to be altered accordingly. • If this is supposed to be a "remedy" only for the wetlands project, then the community should be afforded the opportunity for review if the wetlands project is not implemented. • The decisions for the Navy revetments and ditch and spoils pile in the same area appear to be inconsistent: it is not feasible to place three feet of cover over one, and not the others. This could also affect the transfer of the property to the State Coastal Commission as the Navy property is integral to the Hamilton Wetlands Restoration Project and any uncertainty regarding a remedy for this property could cause delays and force critical elements to be redesigned. How does this situation affect wetland modeling? ***Please clarify and explain and cite references in the subject documents***	**Response to first bullet:** The performance criteria described in alternative 3 requires the placement of 3 feet of cover, and the performance criteria described in alternative 4 requires either the placement of 3 feet of cover or implementation of a State-approved equivalent measure. As provided in the ROD/RAP, following the period of implementation of the HWRP, for Alternative 3 sites the Army and the property owner shall ensure that the remedy is maintained, and for the Alternative 4 sites the property owner shall ensure that the performance criteria is maintained, to the extent necessary to protect human health and the environment. **Response to second bullet:** As stated in the executive summary (page ES-2) "the Hamilton Reuse Plan designates the Main Airfield Parcel as open space for wildlife habitat restoration and wetland restoration use. If the HWRP does not proceed or is not completed, then this ROD/RAP may be reopened to address environmental actions for other land uses." Reopening of the ROD/RAP would require public input. **Response to third bullet:** The Army took actions to remediate the drainage ditch and Spoil Pile N, which are on Navy property. Since the Army took actions on these features, and with the concurrence of the Navy, they are included in this ROD/RAP. It is feasible to cover the ditch and spoil pile without covering the revetments. Affects on wetland modeling and any other issues related to the Navy property are beyond the scope of this document. See also response to bullet number 2. Other releases on the Navy property would be addressed by the Navy outside of this effort

No.	Comments	Responses
		and document. Transfer of the Navy property is also beyond the scope of this document.
7.	**Modeling for scour and tidal action** has not been presented to the public nor has it been shown to work; there is no technical analysis in the Inboard Area or CSM feasibility studies or for public review. There is nothing in the administrative record showing the projected scour depth and width of the channels through the life of the wetlands (from birth through maturity), and the Site Cleanup Requirements do not even require a rigorous analysis to demonstrate stability during the maturation process. No technical basis has been provided for concluding three feet stable cover can be achieved. ***Please correct ambiguous statements in the subject documents and provide documentation and references for the above.***	The modeling for scour and tidal actions is beyond the scope of this ROD/RAP. This is a remedy implementation concern. The Army and the Corps will have to demonstrate that the ROD/RAP performance criteria can be achieved. If not, then those sites where Alternative 3 is proposed would require excavation with offsite disposal. Alternative 4 sites may be managed on-site after approval of a soil management plan, which may allow reuse of the soils in an area where they will be stable. This determination will be made upon completion of the wetland design efforts. The Site Cleanup Requirements require, and the Army intends to submit, a proposal to evaluate Remedial Action Effectiveness, including stability of the cover material; this is task 8.
8.	**Historic Flooding** - There is photo documentation from an investigation indicating that there has been Historic Flooding of the Hamilton Air Force Base property and adjacent parcels. This raises serious fate and transport issues regarding toxic contamination on HAFB and neighboring properties and the potential of releases due to the wetlands project when tidal action is introduced. The response by the Army from the draft comments was inadequate and failed to investigate the sources of photographic evidence as provided to them. ***Please research historic flooding through the resources listed by Friends of Novato Creek and include discussion in ROD/RAP.***	The photo documentation of the surrounding parcels is not conclusive of any uncontrolled flooding on the BRAC property. The photos of standing water on the runway show that the storm water control berms are working as designed to control surface water runoff from soil stockpiles. The berms were put in place to control runoff from the soil stockpiles that came from a petroleum release site. The berms capture the runoff so that it must either evaporate or move slowly through the berms in which case the berm would trap any sediment being transported. Standing water does not present a fate and transport issue and the Army has no records of general uncontrolled flooding over the BRAC property. There are systems in place to accept floodwaters from adjacent properties into the BRAC properties perimeter drainage ditch which then conveys the water in a controlled manner to the pump stations where it is discharged to San Pablo Bay. The drainage network

No.	Comments	Responses
		was designed to keep an operating airfield dry under extreme conditions. In 1998, there were no levee breaches or uncontrolled flooding. At this time, standing water was present on portions of the airfield and water topped the levee near the pump stations but was contained in the PDD and pumped back over the levee.
9.	**Basewide DDT's contamination** continues to be a critical issue which still seems to be given minor import. The CSM proposed remediation sites fail to include high samples of DDT in the remediation areas. Historic Flooding evidence serves to compound the issue, as well as the potential channelization from the Wetlands Project Design. ***Please include recent ACOE sampling data on Basewide DDT's***	The ROD/RAP fully addresses Inboard Area-wide DDTs and the remedy for it. Since the ROD/RAP fully addresses the DDTs issue and the required alternatives, there is no need for including the new data as a part of the ROD/RAP. The ROD/RAP also identifies DDTs as a chemical of potential concern at 8 of the 10 CSM sites, all of which are identified for excavation. The other two sites (Historic ODD and Boat Dock Channel Area) did not have DDTs identified as a COPC.
10.	**Groundwater issues** and potential contamination continue to be of concern. To date, the requested data map for all of the groundwater data gathered so far, has not been produced for the public record, and the conclusions drawn in the feasibility study regarding groundwater contamination being "isolated" are not supported by an adequate monitoring well network or monitoring history. Highlighting this concern are two sampling data points from the ROD/RAP regarding Building 20 and 82 which exceeded water quality objectives for petroleum hydrocarbons, yet seem to have received no notice or additional action as would be appropriate. The Federal Clean Water Act is an applicable statute, as is the California Water Code. ***Please provide a basewide groundwater monitoring plan; please provide a basewide data map of ousting sampling events. Please provide a remedy for groundwater contamination***	All data reviewed indicate detections of contaminants in groundwater are isolated and non- contiguous events, therefore there has been no requirement for preparation of a comprehensive map. The building 20 sample was taken from a borrow pit at the time the tank was pulled from the site and is not representative of groundwater. Regarding Building 82, the source has been removed; the residual concentrations that remain are not migrating and are at levels consistent with protection of human health and the environment.

No.	Comments	Responses
		All final reports for groundwater monitoring are available in the Hamilton BRAC Office for review.
11.	**The Storm Drains under the airfield and at both ends of the airfield need to be included for remediation. Please correct errors in storm drain documentation.**	All stormwater drainage systems that are known to exist are included for remediation. See Figure 2.4-1. Storm drains in the Building 82/87/92/94 Area are included with the Building 82/87/92/94 Area site (Alternative 3). Sanitary sewer lines near the Former Sewage Treatment Plant were included with the Former Sewage Treatment Plant site (Alternative 3). Storm drains in the revetment area were included with Revetments 1 through 4, 11 through 14, 16, 19, 21 through 23, 25 and 26 and the historic revetments (Alternative 3). See Figure 2.4-1 and Table ES-3.
12.	**Please reference the sources for data listed throughout the document.**	The primary sources for data listed throughout the document are provided in Section 2.1.1 and Section 3.1.1.
13.	**Environmental Action Alternatives - (ES-4, ES-5, ES-6)** The discretionary language built into Alternatives 2,3 and 4 is inappropriate as it leaves decision making for a later date, which will not be subject to public review or comment. The Record of Decision should be just that; no vagueness or ambiguity should be included in the decisions presented. • Every site with contaminants above the action goals should have an Alternative (other than no further action) assigned to it - whether it is Inboard or in the CSM. ***Please complete the above task for sites in the subject documents.*** **Alternative 2** - The following discretionary phrase/s should be **removed** from all references contained in the subject documents: ".. .it is determined by the state and Army that further excavation is unpractical, or state and Army agree that	The flexibility in the Alternatives is needed to allow the Army Civil Works Program to achieve the performance criteria through implementation of the wetland plan. The built-in flexibility will allow the wetland design to move forward in a way that meets requirements of protecting future receptors. These alternatives are fully protective of human health and the environment. Every site with contaminants above the action goals for COCs at that site has an alternative proposed in the ROD/RAP. The action goals are not not-to-exceed goals that should be applied to each sample result. They represent goals that need to be met on average at each site. **Alternative 2-**

No.	Comments	Responses
	the remaining contamination will not pose an unacceptable risk to human health and the environment." Institutional Controls should not be used for the CSM, as there is nothing in the administrative record to suggest contaminants left in the tidally-influenced would remain stable until such tune as the contaminants no longer presented a risk; they do not address issues pertinent to the CSM and therefore are inappropriate and irrelevant as an alternative. Leaving contamination above the action goals would not be protective of human or environmental health in the sensitive habitat of the CSM. **Alternative 3** - The Army should be responsible for monitoring the stability of the areas where three feet of stable cover must remain in place until maturity of the wetlands project - which is 50 years, not the 13 years of monitoring in the ROD/RAP (ES-P5). • Please define the legal responsibilities (including monitoring and remediation) of the Army and/ or HWRP landowner in the event of a natural disaster (e.g., flood or earthquake) such that the three feet of stable cover required is compromised and exposure of toxics to the public and ecological receptors takes place. **Alternative 4** - Any contamination remaining that is above the action goals must be under three feet of stable cover or be removed. There are no acceptable Institutional Controls that would achieve the same result if the action would include partial removal of contamination and failure to achieve three feet of cover. All decisions should be stated in the ROD/RAP and not left to future discretionary actions by agencies insulated from public review. • Comments from Alternative 3 (above) apply to Alternative 4	The ROD/RAP proposed excavation in the CSM as the preferred alternative. At two locations in the CSM, contaminants are known to be at depth. These contaminants are generally petroleum type contaminants. The action goals for these contaminants are based on direct contact of benthic invertebrates to contaminated sediments. Despite the fact that the goals are based on direct contact to benthic invertebrates, the Army intends on excavating to depth, as long as this is practical. This will be a decision that is made during the remedial design phase and will be based on conditions encountered in the field. ICs are not used as an alternative. **Alternative 3** – The HWRP will monitor the stability of the cover for 13 years after levee breach. As stated in the ROD/RAP (ES-6), after that the Army and the property owner shall ensure that the remedy for these sites is maintained. The legal responsibilities for remediation of Alternative 3 sites remains with the Army BRAC program. **Alternative 4** – The ROD/RAP does not suggest the use of institutional controls in place of a remedy. It does specify that some institutional controls are required for sites where contamination remains in place. This use of institutional controls is appropriate. The responses to Alternative 3 also apply here with the exception that after the HWRP 13 year monitoring period ends the state is solely responsible to ensure that the stable cover or its equivalent is maintained. Since the only criteria for the three feet of fill is to provide a physical separation between the existing site soils and the new wetland receptors, it is possible that a more effective barrier could be used and would be protective of human health and the environment. The flexibility in this alternative allows the

No.	Comments	Responses
	as well. • The following discretionary phrases should be **removed** from all references contained in the subject documents: ".. .or appropriate alternative action providing a level of protection equivalent to three feet of stable cover, as agreed by the Army and RWQCB."	HWRP to design the best wetland possible. Overall, in terms of public review, the Restoration Advisory Board (RAB) will still be the venue by which the public can participate in the remedial process. A representative from the HWRP will participate in the quarterly RAB meetings.
14.	**Institutional Controls** - (ES-7) • There is not enough detail provided in regard to the monitoring of sites with residual contamination. • There are no specific or applicable criteria written for use within the CSM area, and should not be referred to as an option until such information is included in the definition. • Areas left in place that exceed the action goals and where three feet of stable cover cannot be maintained should not be exposed to tidal action and erosion. ***Please add these corrections to the subject documents.***	A monitoring plan will be developed as part of the HWRP and the remedial design process. Monitoring is not a part of the institutional controls. Institutional controls are not used as alternatives; please see Section 3 of the ROD/RAP for CSM sites. We agree with the comment. This is why Alternative 2 was chosen for those sites where scour or erosion are expected such that three feet of cover would not be feasible. However, this does not have anything to do with institutional controls.
15.	**Activities to be completed** - (ES-7) It is premature to select a remedy for sites, which have not been characterized. Pollutants of concern, and the extent and severity of contamination, need to be determined prior to proposing a remedy for public review and comment. It is erroneous to assume that the action goals proposed in the ROD/RAP will apply to all sites, absent characterization. For example, the skeet range may contain lead shot, for which there are additional standards. ***Please correct these errors, which appear throughout the ROD/RAP.***	It is not anticipated that a different remedy will be required than those proposed for other sites in the Inboard Area. The remedies provided in the ROD/RAP will apply to the sites in question if it is determined that the sites require remediation. The RWQCB staff has recommended adoption of an order to oversee the remedial actions to be conducted by the Army. If a cleanup (action) goal for lead shot is necessary, that order can be amended to include such an action goal.
16.	**Table** ES-2 **Action Goals-** **a.** When additional chemicals of concern are identified, action goals will need to be developed based on applicable or relevant and appropriate requirements, and a risk assessment. **b.** Criteria and weights and measures for Action goals should	a. Action goals were developed from various sources identified in ROD/RAP. Future or additional action goals will be evaluated on case-by-case basis and will be based on similar sources. As presented in the ROD/RAP, these sources are not necessarily ARARs or risk-based numbers. Additional COCs and action goals would only be expected

No.	Comments	Responses
	be made consistent throughout all reference documents (e.g., mg/kg in one document referenced to another with a value of ppm or ppb). c. c. Decide whether to use wet or dry measurements and be consistent. *Please make these corrections to the subject documents*	at ASR sites where additional investigations are planned. Simply exceeding an Action Goal does not mean that there is an unacceptable risk to future receptors. These Action Goals were not used as a "not-to-exceed values" for determining whether or not a site should be excavated. Instead all the available data were evaluated. b. Criteria and weights and measures for action goals in the ROD/RAP are consistent. The ROD/RAP consistently uses parts per million (ppm). The action goals are only found in the ROD/RAP and no other documents. Amending the reference documents would not be feasible. c. Unless otherwise noted measurements are in dry weight.
17.	**Figure ES-2 Area wide DDT's and PAH's - Main Airfield Parcel -** Show gradations of concentrations of constituents presented; identify in the legend the concentration ranges; reference data source. The Army used a study of only 23 samples for the entire Airfield Parcel and found DDT's ranging up to .935 ppm and PAH's up to 54.9 ppm. ***Please add these corrections to the subject documents.***	The DDT and PAH data are presented in the Remedial Design Investigation Final Data Report prepared by Foster Wheeler, 2000 which is referenced by the ROD/RAP.
18.	**Sewage Pipeline and Historic Discharge Site - (P2.1-4)** the site should be investigated, contaminants should be identified, and remediated if necessary. The outfall of the sewer pipe - 600 feet into the bay to the south east of the runway - is likely a source of contamination in the CSM and San Pablo Bay sediments.	The historic discharge to the bay would be difficult to distinguish from many years of sediments that have accumulated since the pipeline was abandoned. The discharge pipe was in use from the 1930s until 1942 and is not a likely source of contamination. No investigation is planned.
19.	**Historic PDD - (P2.1-11)** Has there been testing done in the old historic PDD? Please show location and current contamination status, if any, especially in areas that may remain exposed.	There is no site called the historic PDD. We assume the comment refers to the portion of the PDD that was replaced with a 54-inch storm drain line. The 54-inch storm drain line was investigated as a part of the onshore fuel line site.

No.	Comments	Responses
20.	**Characterization of contaminants in general, specific example of PDD Spoils pile** (2.4-15) It is not adequate information for a site characterization to be based on one sample point; the extent and severity of contamination can not be determined from a single point. ***Please address the need for more than one sample point in characterization of a site and rectify this situation in the subject documents.***	The number of samples at a spoil pile was determined by the size of the spoil pile. All remnants of the piles have been removed and the data is considered to apply to the whole footprint of the former pile. The revetment pads that only have one sample location had previous sampling around the perimeter of the concrete pads that indicated no contamination was present beyond the concrete. These revetments are therefore characterized by what was detected under the concrete pad. . No additional investigation is planned.
21.	**Onshore Fuel lines - (p2.4-18)** Contamination of JP-4, diesel, and PAH's vastly exceeded the action goals for these substances. The extent of the contamination is such that removal of soil is indicated under California UST regulations to best protect human and environmental health. ***Please revise and indicate the above in the ROD/RAP.***	Appendix E of the Inboard Area FFS contains a fate and transport analysis that addressed this issue. The analysis concluded that 3 feet of cover would adequately protect human health and the environment. The action levels established in the ROD/RAP for JP-4, diesel and PAHs are to protect benthic invertebrates based on an exposure pathway requiring direct contact with contaminated soils; the maximum concentrations were generally found at depth. The remedy is protective of human health and the environment. There is no specific remedy required under the California UST regulations.
22.	**Are there any existing or planned financial benefits to come from the Port of Oakland or other dredge spoils projects? Please disclose these financial arrangements, and how the revenue will be used. What comparisons can be drawn to the financial costs of using Alternatives 3 and 4?** ***Please disclose this information in the relevant subject documents***	There are no known or planned benefits to the Army BRAC program. Since Hamilton is included in the Port of Oakland/Army Corps of Engineers project as a dredge disposal site, they will pay a portion of the site preparation costs to receive their material. Some other dredging projects will pay an incremental cost equivalent to their savings for using Hamilton versus other dredge disposal options. This incremental cost will not fully defray the cost of importing those dredge materials and the balance of the costs will be borne by the HWRP. Since these costs are a part of the implementation of the HWRP, they were not considered to be a cost for Alternative 3 and 4. The cost estimates in the ROD/RAP are a true reflection of the potential costs for implementing the

No.	Comments	Responses
		remedies and no change is needed.
23.	**Inboard - Sample points above action goals - *NOT* currently proposed for remediation. Please identify the Alternative to be used for each site.**	These sample points are evaluated in the Focused Feasibility Study and are addressed in the ROD/RAP. No further alternatives are proposed other than what it is in the ROD/RAP. The data points are evaluated as part of an overall site. The Action Goals are not "not to exceed values" for determining whether or not a sample location should be excavated. Individual samples are evaluated as part of a site. **Please see "Specific Sample Responses" table below**
24.	**Coastal Salt Marsh - Mapping of data points above action goals that were not included under proposed remediation areas. Please identify the Alternative to be used for each site.**	These sample points are evaluated in the Focused Feasibility Study and are addressed in the ROD/RAP. No further alternatives are proposed other than what it is in the

Revetments:	RVT-II-AS-1	NW Runway Area:	HB-99-SO-23
	RVT-II-AS-2		HB-99-SO-23X
	RVT-II-AS-3		SL-23-TW-003
	RVT-TW-1	Onshore Fuel Line:	PRL-0313
	RVT-09-AS-2		PRL-0319
	RVT-09-AS-3		PRL-0323
	RVT-09-AS-6		PRL-0325
	RVT-TW-6		PRL-0305
FDD:	SS-PDUL-S19E	FSTP:	CS-FSTP-SO7
	S15E		CS-FSTP-S10
	S113W		CS-FSTP-B13
	SHE		CS-FSTP-B19
	S39E		
	S21W		
	S25W		
	S33W		
	S37W		
Building 41:	HB-6373		

No.	Comments	Responses
	areas. Please identify the Alternative to be used for each site. In our review and mapping of the sampling data points of the proposed remediation areas, we discovered many sampling points that were above the action goals, yet were outside the proposed remediation areas. What follows is a listing of ADDITIONAL sampling points that should be included in expanded remediation areas. There are also a number of locations that need to be added to the proposed remediation list. Four maps accompany this table - please see attachments. Sampling should be done to determine the outer boundary of contamination and the depth, prior to beginning remediation on these expanded sites. Where contamination exceeds action goals in the CSM, all material should be removed. **Expanded Remediation for the CSM** **A partial list of sample points above action goals - which are *outside* the currently**	ROD/RAP. The data points are evaluated as part of an overall site. The Action Goals are not "not to exceed values" for determining whether or not a sample location should be excavated. The proposed remediation areas in the ROD/RAP are approximate and generalized. The final excavation boundaries will be determined through pre- and post confirmation sampling, and as part of the remedial design developed in discussion with regulators and trustee agencies The Army will update the public on the final excavation boundaries at a future RAB meeting.

No.	Comments	Responses
	Figure 6-1: TWA-SD-23: Be, Cr, Ni, Mn TWA-SD-21: Be, Co, Mn, Ag TWA-SD-19: As, Co, Cu, Pb, Hg, Ni, Ag, Zn CSM-HM-SD-395: Be,Cu HAAF-CHEM-207: DCP, EA.MCPA, MCPP HAAF-CHEM-208: DCP, EA,MCPA, MCPP HAAF-CHEM-212: DCP, EA,MCPA, MCPP, PAHs, HC, HCE HAAF-CHEM-211: As, Ba, Cd, Pb, Ag, DCP, EA,MCPA, MCPP, PAHs, HC, HCE CSM-ODD-SD-332: As, Ba, Cr, Cu, Co, Pb, Ni, Zn CSM-ODD-SD-333: Ba, Cd, Co, Cu, Pb, Mn, Hg, Ni, Ag,Zn	

No.	Comments	Responses
	Figure 6-2	

CSM-HM-SD-396	Cu, Pb, Hg, Ag, Zn,
CSM-HM-SD-398	As, Ag, Hg
TP-SD-3	PCB,Hg
TP-SD-3A	DDT, CLA, Pb, Co, Hg, Ag, V,Zn
SC-HCSM-004	DDT
EL-MW-101	Br,Pb
TWA-SD08	As, Be, Bo, Co, Pb, Hg, Ni, Ag,Zn
SC-HCSM-017	Br, Co, Pb, Ni, Ag, Zn, Cu
TWA-SD09	As, Bo, Ca, Co, Pb, Zn, Hg, Ag
SC-HCSM-016	Mn,Co
CSM-HM-SD-399	As,Cd
SC-HCSM-018	Cd,Be,Co,Cu,Pb,Hg,Ni, Ag,Zn
HT-03	Ba,Zn,Pb
HT-14	Pb, Zn, Ba
HT-05	Pb,Zn,Ba
HT-04	Zn,Pb
HT-09	Pb,Zn
EL-MW-104	Cd,Pb,Ag
ODD-SD5	PCP
SB-ELBP-04	PCB
CSM-HDD-SD-341	Pb,(Hg)
CSM-HDD-SD-342	DDT,(Hg)
TWA-SD25	Pb,Ag
CSM-A14-SD-374	Ba,Pb
CSM-A14-SD-375	PAHs, Co, Ni
CSM-A14-SD-376	Ba, DDT, PAHs
CSM-A14-SD-378	Ba

No.	Comments	Responses
	Figure 6-3 TWA-SD02 — Cr, Co, Cu, Mn, Ni, Ag, Zn, V 32 — DDT, CLA, Cu, Pb, Zn 38 — DDT, Ag, TPH-g 39 — DDT, PAHs, Ag, BHC, MOC 36 — DDT, Ba, Pb, PAHs, MOC, MPE 34 — DDT, TPH, MOC, Pb	
25.	Comments were provided on Figures	The proposed geometry of the remediation areas in the ROD/RAP is approximate and generalized. The final excavation boundaries will be determined through pre- and post confirmation sampling, and as part of the remedial design developed in discussion with regulators and trustee agencies. The Army will update the public on the final excavation boundaries at a future RAB meeting.

Responses to Friends of Novato Creek Sample Specific Comments

Sample Location	Response
Figure 6-1	
TWA-SD23	At the scale presented in the ROD/RAP, the excavation areas are generalized. The generalized areas represent the areas where COCs/COPCs are found above action goals. The action goals are not used as "not to exceed values" for determining whether or not a sample location should be excavated. The remedial design process will define the final geometry of the excavations through pre-or post-excavation confirmation sampling.
TWA-SD21	This sample location was evaluated, but is not recommended for excavation due to the remote location of the sample. There is the potential for more harm from destruction of habitat that will occur to access this sample location than benefit by excavation at this location.
TWA-SD19	At the scale presented in the ROD/RAP, the excavation areas are generalized. The generalized areas represent the areas where COCs/COPCs are found above action goals. The action goals are not used as "not to exceed values" for determining whether or not a sample location should be excavated. The remedial design process will define the final geometry of the excavations through pre- or post-excavation confirmation sampling.
CSM-HM-SD-395	Every site with contaminants above the action goals for COCs of concern at the site has an alternative proposed in the ROD/RAP. The action goals are not not-to-exceed goals that should be applied to each sample result. The analytical results are slightly over the action goals for the chemicals of concern and do not indicate a release.
HAAF-CHEM-207	The analytes listed in the comment were not detected in this sample.
HAAF-CHEM-208	The analytes listed in the comment were not detected in this sample.
HAAF-CHEM-212	The herbicides and insecticide listed in the comment were not detected in this sample. The summed value for total PAHs was 0.3069 mg/kg over the action goal. Hydrocarbons were not detected above the action goals. The action goals are not used as "not to exceed values" for determining whether or not a sample location should be excavated.

HAAF-CHEM-211	Arsenic was not identified as a COPC for this site. Barium was not detected above the action goal. Cadmium was reported at 0.6 mg/kg over the action goal. Lead was not detected in the sample. Silver was not identified as a COPC for this site. The herbicides and insecticide requested in the comment were not detected in this sample. Total PAHs did not exceed the action goal. Hydrocarbons were not detected above the action goals. The action goals are not used as "not to exceed values" for determining whether or not a sample location should be excavated.
CSM-ODD-SD-332	At the scale presented in the ROD/RAP, the excavation areas are generalized. The generalized areas represent the areas where COCs/COPCs are found above action goals. The action goals are not used as "not to exceed values" for determining whether or not a sample location should be excavated. The remedial design process will define the final geometry of the excavations through pre- or post-excavation confirmation sampling.
CSM-ODD-SD-333	At the scale presented in the ROD/RAP, the excavation areas are generalized. The generalized areas represent the areas where COCs/COPCs are found above action goals. The action goals are not used as "not to exceed values" for determining whether or not a sample location should be excavated. The remedial design process will define the final geometry of the excavations through pre- or post-excavation confirmation sampling.
Figure 6-2	
CSM-HM-SD-396	The map in the ROD/RAP showing this area as requiring remediation is correct
CSM-HM-SD-398	The map in the ROD/RAP showing this area as requiring remediation is correct.
TP-SD-3	The map in the ROD/RAP showing this area as requiring remediation is correct.
TP-SD-3A	The map in the ROD/RAP showing this area as requiring remediation is correct.
SC-HCSM-004	At the scale presented in the ROD/RAP, the excavation areas are generalized. The generalized areas represent the areas where COCs/COPCs are found above action goals. The action goals are not used as "not to exceed values" for determining whether or not a sample location should be excavated. The remedial design process will define the final geometry of the excavations through pre- or post-excavation confirmation sampling.

EL-MW-101	This sample was collected during installation of a monitoring well. The well has been closed and no remediation is proposed. This site was evaluated but was not recommended for excavation due to the location of the sample site and the concentration of lead (53 mg/kg) at 3.3 mg/kg above the action goal. The action goals are not used as "not to exceed values" for determining whether or not a sample location should be excavated. Bromine was not analyzed for this sample.
SC-HCSM-017 SC-HCSM-018 TWA-SD08 TWA-SD09	At the scale presented in the ROD/RAP, the excavation areas are generalized. The generalized areas represent the areas where COCs/COPCs are found above action goals. The action goals are not used as "not to exceed values" for determining whether or not a sample location should be excavated. The remedial design process will define the final geometry of the excavations through pre- or post-excavation confirmation sampling.
SC-HCSM-016	At the scale presented in the ROD/RAP, the excavation areas are generalized. The generalized areas represent the areas where COCs/COPCs are found above action goals. The remedial design process will define the final geometry of the excavations through pre- or post-excavation confirmation sampling.
CSM-HM-SD-399	At the scale presented in the ROD/RAP, the excavation areas are generalized. The generalized areas represent the areas where COCs/COPCs are found above action goals. The remedial design process will define the final geometry of the excavations through pre- or post-excavation confirmation sampling.
HT-03 HT-04 HT-05	At the scale presented in the ROD/RAP, the excavation areas are generalized. The generalized areas represent the areas where COCs/COPCs are found above action goals. The remedial design process will define the final geometry of the excavations through pre- or post-excavation confirmation sampling.
HT-14	The area associated with these samples is recommended for remediation. At the scale presented in the ROD/RAP, the excavation areas are generalized. The generalized areas represent the areas where COCs/COPCs are found above action goals. The remedial design process will define the final geometry of the excavations through pre- or post-excavation confirmation sampling.

HT-09	At the scale presented in the ROD/RAP, the excavation areas are generalized. The generalized areas represent the areas where COCs/COPCs are found above action goals. The action goals are not used as "not to exceed values" for determining whether or not a sample location should be excavated. The remedial design process will define the final geometry of the excavations through pre- or post-excavation confirmation sampling.
EL-MW-104	At the scale presented in the ROD/RAP, the excavation areas are generalized. The generalized areas represent the areas where COCs/COPCs are found above action goals. The action goals are not used as "not to exceed values" for determining whether or not a sample location should be excavated. The remedial design process will define the final geometry of the excavations through pre- or post-excavation confirmation sampling.
CSM-CDA-SD-363.	This sample is highlighted in the copy of CSM Figure 6-2 that was included with the FNC comments, with the notation "pcb." At the scale presented in the ROD/RAP, the excavation areas are generalized. The generalized areas represent the areas where COCs/COPCs are found above action goals. The action goals are not used as "not to exceed values" for determining whether or not a sample location should be excavated. The remedial design process will define the final geometry of the excavations through pre- or post-excavation confirmation sampling.
ODD-SD5	At the scale presented in the ROD/RAP, the excavation areas are generalized. The generalized areas represent the areas where COCs/COPCs are found above action goals. The action goals are not used as "not to exceed values" for determining whether or not a sample location should be excavated. The remedial design process will define the final geometry of the excavations through pre- or post-excavation confirmation sampling.
SB-ELBP-04	At the scale presented in the ROD/RAP, the excavation areas are generalized. The generalized areas represent the areas where COCs/COPCs are found above action goals. The remedial design process will define the final geometry of the excavations through pre- or post-excavation confirmation sampling.
CSM-HDD-SD-341	At the scale presented in the ROD/RAP, the excavation areas are generalized. The generalized areas represent the areas where COCs/COPCs are found above action goals. The action goals are not used as "not to exceed values" for determining whether or not a sample location should be excavated. The remedial design process will define the final geometry of the excavations through pre-or-post excavation confirmation sampling.

CSM-HDD-SD-342	This sample location is located within the area proposed for remediation presented in the ROD/RAP.
TWA-SD25	At the scale presented in the ROD/RAP, the excavation areas are generalized. The generalized areas represent the areas where COCs/COPCs are found above action goals. The action goals are not used as "not to exceed values" for determining whether or not a sample location should be excavated. The remedial design process will define the final geometry of the excavations through pre-or-post excavation confirmation sampling.
CSM-A14-SD-374	At the scale presented in the ROD/RAP, the excavation areas are generalized. The generalized areas represent the areas where COCs/COPCs are found above action goals. The action goals are not used as "not to exceed values" for determining whether or not a sample location should be excavated. The remedial design process will define the final geometry of the excavations through pre-or-post excavation confirmation sampling.
CSM-A14-SD-375	At the scale presented in the ROD/RAP, the excavation areas are generalized. The generalized areas represent the areas where COCs/COPCs are found above action goals. The action goals are not used as "not to exceed values" for determining whether or not a sample location should be excavated. The remedial design process will define the final geometry of the excavations through pre-or-post excavation confirmation sampling.
CSM-A14-SD-376	At the scale presented in the ROD/RAP, the excavation areas are generalized. The generalized areas represent the areas where COCs/COPCs are found above action goals. The action goals are not used as "not to exceed values" for determining whether or not a sample location should be excavated. The remedial design process will define the final geometry of the excavations through pre-or-post excavation confirmation sampling.
CSM-A14-SD-378	At the scale presented in the ROD/RAP, the excavation areas are generalized. The generalized areas represent the areas where COCs/COPCs are found above action goals. The action goals are not used as "not to exceed values" for determining whether or not a sample location should be excavated. The remedial design process will define the final geometry of the excavations through pre-or-post excavation confirmation sampling.
Figure 6-3	
TWA-SD02	At the scale presented in the ROD/RAP, the excavation areas are generalized. The generalized areas represent the areas where COCs/COPCs are found above action goals. The action goals are not used as "not to exceed values" for determining whether or not a sample location should be

	excavated. The remedial design process will define the final geometry of the excavations through pre-or-post excavation confirmation sampling.
32	This sample location is located in the area proposed for excavation in the ROD/RAP.
38	At the scale presented in the ROD/RAP, the excavation areas are generalized. The generalized areas represent the areas where COCs/COPCs are found above action goals. The action goals are not used as "not to exceed values" for determining whether or not a sample location should be excavated. The remedial design process will define the final geometry of the excavations through pre-or-post excavation confirmation sampling.
39	At the scale presented in the ROD/RAP, the excavation areas are generalized. The generalized areas represent the areas where COCs/COPCs are found above action goals. The action goals are not used as "not to exceed values" for determining whether or not a sample location should be excavated. The remedial design process will define the final geometry of the excavations through pre-or-post excavation confirmation sampling.
36	At the scale presented in the ROD/RAP, the excavation areas are generalized. The generalized areas represent the areas where COCs/COPCs are found above action goals. The action goals are not used as "not to exceed values" for determining whether or not a sample location should be excavated. The remedial design process will define the final geometry of the excavations through pre-or-post excavation confirmation sampling.
34	At the scale presented in the ROD/RAP, the excavation areas are generalized. The generalized areas represent the areas where COCs/COPCs are found above action goals. The action goals are not used as "not to exceed values" for determining whether or not a sample location should be excavated. The remedial design process will define the final geometry of the excavations through pre-or-post excavation confirmation sampling.
Revetments	
RVT-11-AS-1	This sample location is within the area proposed for remediation under Remedial Alternative 3 in the ROD/RAP
RVT-11-AS-2	This sample location is within the area proposed for remediation under Remedial Alternative 3 in the ROD/RAP
RVT-11-AS-3	This sample location is within the area proposed for remediation under Remedial Alternative 3 in the ROD/RAP

RVT-TW-1	Not proposed for remediation; the 95 UCL for Ni did not exceed the Action Goal
RVT-09-AS-2	Not proposed for remediation; the 95 UCL for Be did not exceed the Action Goal
RVT-09-AS-3	Not proposed for remediation; the 95 UCL for Be did not exceed the Action Goal
RVT-09-AS-6	Not proposed for remediation; the 95 UCL for Cu did not exceed the Action Goal
RVT-TW-6	This sample location is within the area proposed for remediation under Remedial Alternative 3 in the ROD/RAP
PDD	
SS-PDUL-S19E	This sample location is within the area proposed for remediation under either Remedial Alternative 2 or 3 in the ROD/RAP
S15E	This sample location is within the area proposed for remediation under either Remedial Alternative 2 or 3 in the ROD/RAP
SS113W	This sample location is within the area proposed for remediation under either Remedial Alternative 2 or 3 in the ROD/RAP
S11E	This sample location is within the area proposed for remediation under either Remedial Alternative 2 or 3 in the ROD/RAP
S39E	This sample location is within the area proposed for remediation under either Remedial Alternative 2 or 3 in the ROD/RAP
S21W	This sample location is within the area proposed for remediation under either Remedial Alternative 2 or 3 in the ROD/RAP
S25W	This sample location is within the area proposed for remediation under either Remedial Alternative 2 or 3 in the ROD/RAP
S33W	This sample location is within the area proposed for remediation under either Remedial Alternative 2 or 3 in the ROD/RAP
S37W	This sample location is within the area proposed for remediation under either Remedial Alternative 2 or 3 in the ROD/RAP
BLDG 41	
HB-6373	This sample location is within the area proposed for remediation under Remedial Alternative 2 in the ROD/RAP

NW RUNWAY AREA	
HB-99-SO-23	Analytical results did not exceed Action Goals for this site
HB-99-SO-23X	Analytical results did not exceed Action Goals for this site
SL-23-TW-003	Analytical results did not exceed Action Goals for this site
ONSFL	
PRL-0313	This sample location is within the area proposed for remediation under Remedial Alternative 3 in the ROD/RAP
PRL-0319	This sample location is within the area proposed for remediation under Remedial Alternative 3 in the ROD/RAP
PRL-0323	This sample location is within the area proposed for remediation under Remedial Alternative 3 in the ROD/RAP
PRL-0325	This sample location is within the area proposed for remediation under Remedial Alternative 3 in the ROD/RAP
PRL-0305	This sample location is within the area proposed for remediation under Remedial Alternative 3 in the ROD/RAP

FSTP	
CS-FSTP-SO7	This sample location is within the area proposed for remediation under Remedial Alternative 3 in the ROD/RAP
CS-FSTP-S10	This sample location is within the area proposed for remediation under Remedial Alternative 3 in the ROD/RAP
CS-FSTP-B13	This sample location is within the area proposed for remediation under Remedial Alternative 3 in the ROD/RAP
CS-FSTP-B19	This sample location is within the area proposed for remediation under Remedial Alternative 3 in the ROD/RAP
SB-FSTP-014	This sample location is within the area proposed for remediation under Remedial Alternative 3 in the ROD/RAP
AM-SD-02	The sample in question was collected from a storm drain near Building 86. The storm drain was cleaned during the Army's 1998 Interim Removal Actions. The sample was incorrectly included in the data provided in the risk assessment.

California Department of Fish and Game Comments - Main Airfield Parcel ROD/RAP
May 2003
Responses to Comments

No.	Comments	Responses
James E. Hardwick, California Department of Fish and Game, Office of Spill Prevention and Response, Dated July 22, 2003		
General Comments and Expectations:		
1.	The California Department of Fish and Game, Office of Spill Prevention and Response (hereafter, "DFG/OSPR" or "We") received the Draft Final Record of Decision/Remedial Action Plan (ROD/RAP) for the Hamilton Army Airfield (HAAF) on May 16, 2003. HAAF is a former military installation located in the City of Novato, Marin County. The Inboard area of the former installation is on a subsided parcel of land. A perimeter levee excludes the tidal waters of San Pablo Bay from the inboard area of HAAF. The Coastal Salt Marsh is a tidal marsh that lies between the perimeter levee and San Pablo Bay. It provides habitat for a number of wildlife species including thirteen special-status species. The subject document presents the environmental response actions the Army BRAC restoration program will take, and additional environmental assurances the Army Civil Works Program will provide through the Hamilton Wetland Restoration Project (HWRP) to address potential risks associated with residual contaminants on the Main Airfield Parcel. The comments that follow are provided as part of our role as a natural resource trustee for the	Responses to specific comments are provided below.

No.	Comments	Responses
	State of California's fish and wildlife and their habitats.	
2.	The DFG/OSPR supports the ROD/RAP, early transfer, and the wetland project. Our primary concerns with respect to the ROD/RAP language pertain to our observation that a large number of sample locations lying outside the proposed remedial action areas have contaminant concentrations well above the action goals in the CSM (this is inconsistent with the primary selection criterion for Alternative 2). Specific examples of these locations are identified in our comments on the CSM Focused Feasibility Study, June, 2003 (FFS; provided under separate cover to the U.S. Department of the Army and State agencies). The DFG/OSPR understands that currently proposed remedial action areas (as described in the ROD/RAP) are subject to further evaluation, in light of all available data and agreed upon action goals, and may be expanded or otherwise modified as determined by State and Federal natural resource trustees.	Simply exceeding an Action Goal does not mean that there is an unacceptable risk to future receptors. These Action Goals were not used as a "not to exceed values" for determining whether or not a site should be excavated. Instead all the available data was evaluated. The Army and RWQCB will review the FFS comments and the data points in question, in concert with development of the remedial design. The Remedial Design and other supporting documents will be forwarded to the regulatory agencies and resource trustees (including DFG) for review as the project moves forward. Text has been added to the end of the second paragraph in Section 2.4.4 to read: The final footprint of excavation activities will be determined as part of the remedial design and/or by confirmation sampling conducted during remedial activities.
3.	Regarding Alternatives 3 and 4, these provide considerable flexibility in how or whether contaminants are to be remediated. As with proposed remedial action areas above, the DFG/OSPR understands that decisions regarding the need for 3 feet of stable cover will be made among Trustee agencies after the collection and	Where information regarding sites is incomplete (i.e. Archive Search Report sites), decisions regarding the need for remediation will be made after the collection and evaluation of information is complete. For the other Inboard Area sites, all the necessary information has already been collected to determine appropriate remedial actions (such as the need for 3 feet of stable cover).

No.	Comments	Responses
	evaluation of information about Inboard and CSM sites is complete. Furthermore, we understand that confirmation sampling after wetland construction, as well as monitoring after the levee breach, will be completed in order to verify the efficacy of Alternatives 3 and 4.	feet of stable cover). Neither alternative 3 or 4 are proposed for any of the CSM sites. Excavation With Offsite Disposal - (Alternative 2) is the only remedial action proposed for all of the CSM sites- 3 feet of stable cover was not considered as a remedial alternative for the CSM sites. Confirmation sampling is only planned for sites where excavation will take place. The confirmation sampling will be used to determine the final geometry of excavations and will be conducted prior to excavation or following excavation. The confirmation sampling would be conducted prior to completion of wetland construction. The ROD/RAP requires that a monitoring plan is prepared to verify the effectiveness of cover following breach of the levee. The Regional Board will evaluate remedial actions proposed with input from DTSC and the trustee agencies as necessary. Information on implementation progress will be presented at RAB meetings and available for review by the public.
Conclusion:		
1.	As indicated above, the DFG-OSPR supports the ROD/RAP; however, we request that our understanding of the process for future remedial decisions, as described above, be confirmed in writing. We recognize that further careful consideration of data and selection of remedial actions are required by the State and Federal trustees in order to best achieve protection of fish, wildlife and their habitats from contaminants and	DTSC, RWQCB and the Army appreciate the DFG-OSPR's support of this project. Confirmation and clarification of the understanding of the process for future remedial decisions presented in your comments is provided through this response to comments table. The Remedial Design and other supporting documents will be forwarded to the regulatory agencies and resource trustees for review as the project moves forward.

No.	Comments	Responses
	maximize benefits of the future wetland. Finally, we anticipate the opportunity to review the remedial design for the CSM and any future documents pertaining to sampling and remedial actions.	