

Public Comment, Site A, July 11, 2016.

Apologies, I was unable to attend the Planning Board meeting of July 11, 2016.

Nevertheless, I request that this comment be added to the public comments regarding Item 6 (page 2/22) of the resolution that reads, "The design of the subdivision & its improvements **will not cause serious public health problems**"

I am the current Co-chair of the Restoration Advisory Board (RAB), the DOD designed forum for exchange of information and partnership among citizens, the installation, EPA, and State. ("It is our [DOD's] view that RABs will improve DOD's cleanup program by increasing community understanding and support for cleanup efforts, improving the soundness of government decisions, and ensuring cleanups are responsive to community needs.")

In the spirit of DOD's mandate, please note the Navy has stipulated a Land Use Control (LUC) that **no residences are built on the ground floor of building on OU 2B.** (Planning Board and City Councilmembers refer to Operable Unit 2B as Site A.)

This LUC is to ensure no health problems are caused by the underground VOC plume. (For the extent of the plume please see attached Navy illustration, below.)

While remediation work on the plume continues – and will continue for several more years -- it must be noted that the plume is of such an extent and has so many 'hot spots' – concentrations of VOCs and associated COCs -- that, even the Navy concedes, the plume will never be entirely clean up.

Because the Navy recognizes that this underground plume will never be entirely cleaned up, the Navy stipulates the LUC also include the use of ground floor vapor barriers to lessen concentrations of harmful vapor that may reach the surface. Such barriers, it is hoped, will protect users of the new buildings, particularly those who may choose to reside in them.

As the RAB co-chair I am aware that City representatives are holding preliminary discussions with property developers regarding Site A. I am aware, too, that developers are suggesting, rather than a one floor/ground level buffer with vapor barriers, they use a crawl space with vapor barriers. This is an on-going discussion with state regulators, including Dept of Toxic Substances Control, and, so far, DTSC is disallowing such crawl spaces. Nevertheless, I suspect it is a matter of time before developers find other ingenious ways to circumvent the Navy's LUC.

As a community, let us work together in the spirit of the Navy's LUC – that of looking at the actual reality of the plume and its potential long-term effects – and in the spirit that guided DOD to create RABs.

If the City wants to ensure "The design of the subdivision & its improvements **will not cause serious public health problems**" I request that City representatives be guided by the Navy's LUC.

I request, too, that City representatives communicate the actual status of the cleanup of Site A and its long term prognosis to community members. If City representatives are not sure where to find the most current cleanup status I would be happy to provide it. Thank you.

Susan Galley
RAB Co-chair, 2015/2016.

2013 OU2B Groundwater VOC Plume Limits

