



Community Involvement Plan

**Battery 129/NIKE SF-87C (Hawk Hill), Marin Headlands, CA
Golden Gate National Recreation Area
September 9, 2020**



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LIST OF ABBREVIATIONS AND ACRONYMS

| | |
|--------------------|---|
| AMSL | above mean sea level |
| AOI | Area of Investigation |
| AST | aboveground storage tank |
| CERCLA | Comprehensive Environmental Response, Compensation, and Liability Act |
| CHF | Central Hazardous Materials Fund |
| CIP | Community Involvement Plan |
| EE/CA | engineering evaluation and cost analysis |
| EPA | U.S. Environmental Protection Agency |
| GGNPC | Golden Gate National Parks Conservancy |
| GGNRA | Golden Gate National Recreation Area |
| GGRO | Golden Gate Raptor Observatory |
| HRT | Habitat Restoration Team |
| NCP | National Oil and Hazardous Substances Pollution Contingency Plan |
| NPS | National Park Service |
| PA | Preliminary Assessment |
| PCBs | polychlorinated biphenyls |
| PEPC | Planning, Environment, and Public Comment |
| PIO | Public Information Office |
| RRR | Records Research Report |
| SF-87C | San Francisco Defense Area Site 87 |
| SI | Site Inspection |
| TPH _{dro} | diesel range total petroleum hydrocarbon |
| USACE | United States Army Corps of Engineers |



USDOJ United States Department of the Interior

UST underground storage tank



1.0 INTRODUCTION

The National Park Service (NPS) is issuing this *Community Involvement Plan* (CIP) as a resource to enable meaningful community involvement throughout its investigation, selection, and implementation of cleanup activities at the Battery 129/NIKE SF-87C (Hawk Hill; the Site). The NPS is conducting these cleanup activities at the Site pursuant to the *Comprehensive Environmental Response, Compensation, and Liability Act* (CERCLA), 42 U.S.C. §§ 9601, *et seq.* and its implementing regulations under the *National Oil and Hazardous Substances Pollution Contingency Plan* (NCP), 40 C.F.R. Part 300. NPS is committed to encouraging public participation and providing opportunities for communication between the NPS and the affected community, interested stakeholders, and community residents during the environmental investigation and cleanup activities at the Site.

CERCLA-related terms are defined in Appendix A, Glossary.

1.1 Purpose and Objectives of the CIP

The CIP has been prepared in accordance with CERCLA and the NCP. The CIP serves as a guide for the NPS to engage and inform community members, environmental groups, government officials, the media, and other interested parties in the environmental investigation and cleanup activities at the Site. The CIP is a “living” document and will be updated or revised, as appropriate, as site conditions change.

The CIP has two key objectives:

1. To provide for the dissemination of information to the public in a timely, accurate, meaningful, and understandable manner.
2. To create opportunities—and ensure the community understands those opportunities—for active public participation, enabling interested persons to provide valuable comments that can be used by the NPS project team for planning and decision making.

The strategies to accomplish these objectives take into consideration the location of the Site and surrounding community. The Site is located in the Golden Gate National Recreation Area (GGNRA) in Sausalito, Marin County, California (Figure 1). The Site is located at the eastern section of Fort Barry on the border of Fort Baker, and is accessible via a paved, steep, winding road, behind a locked gate, off of Conzelman Road. The coordinates of the Site are 37° 49' 39" N, 122° 29' 59" W and the elevation is approximately 880 feet above mean sea level (ft AMSL).

1.2 Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)

The NPS is investigating and considering cleaning up the Site pursuant to CERCLA and the NCP. Congress enacted CERCLA, also known as Superfund, in 1980 to address releases and



threatened releases of hazardous substances into the environment. CERCLA gives the President broad powers to respond to hazardous substance releases and threatened releases as the President deems necessary to protect the public health or welfare or the environment, including enforcement authority with respect to parties responsible for the releases. The President has delegated this authority to a number of federal departments and agencies, including the Department of the Interior. The NPS, an agency within the Department of the Interior, is the CERCLA lead agency for the Site. In addition, the Golden Gate National Parks Conservancy (GGNPC) is supporting the NPS in completing the investigation and cleanup of the Site.

To implement CERCLA, the U.S. Environmental Protection Agency (EPA) created the NCP, which is a set of regulations that detail how CERCLA cleanups are to be conducted, including requirements for community involvement activities. Different requirements apply to different types of response actions. The NPS has determined that a non-time-critical removal action is appropriate for the Site based upon the results of investigations conducted at the Site between 1992 and 2019. These results indicate that further characterization, possible cleanup, and declaration of the Site to be of potential environmental concern may be warranted, as determined by the investigation and cleanup activity performed through the non-time-critical removal action.

A non-time-critical removal action is being conducted at the Site based on NPS's determination that a planning period of six months or more is available prior to the start of removal activities at the Site because no immediate threat to public health or welfare or the environment is present at the Site. A non-time critical removal action is a general term for a response action that will evaluate information and potential alternatives for cleanup; it does not indicate that material will be removed, though that is one possible action that may be taken. As part of the non-time-critical removal action, NPS is conducting an engineering evaluation and cost analysis (EE/CA) to fully characterize the nature and extent of site contamination, evaluate associated potential risks to human health and safety and the environment, identify relevant cleanup requirements, develop a range of cleanup alternatives, and identify a recommended action alternative for the Site. As the lead agency for the Site, NPS must involve the community during the EE/CA process in the manner detailed in the NCP, and this CIP is part of that community involvement process.

1.3 Overview of the CIP

The CIP specifies the community involvement activities that the NPS expects to undertake as investigation and cleanup of the Site proceeds. This CIP is organized as follows:

- Section 1.0 : Introduction – A description of the purpose of the CIP.
- Section 2.0 : Site Background – An overview of the Site including a description and history of the Site, previous site investigations, and current and future site activities.
- Section 3.0 : Community Background – A community profile, history of community involvement at the Site, and summary of community concerns and questions.



- Section 4.0 : Planned Community Involvement Activities – A description of planned methods and activities for communicating with the public concerning site activities, and a general schedule of anticipated community involvement activities.
- Section 5.0 : References – A list of references used in developing this CIP.

The appendices include a glossary (Appendix A), administrative record file and information repository details (Appendix B), contact information (Appendix C), and tables of minimum community involvement requirements (Appendix D).



2.0 PROJECT BACKGROUND

This section provides an overview and background information regarding the project. Section 2.1 describes the site and its history. Section 2.2 summarizes the results of previous environmental studies and investigations conducted at the Site. Section 2.3 gives an overview of current and anticipated future project related activities at the Site.

2.1 Site Description and History

Hawk Hill is the highest peak in the Marin Headlands. The Marin Headlands receives approximately 750,000 visitors a year and in 2014 nearly 2,500 youth participated in programs at Hawk Hill. The site provides a unique opportunity to learn about raptor migration, and the history of World War II and Cold War, with gun pits and casemates for visitors to explore. Visitors to Hawk Hill are rewarded with access to unique cultural and natural resources and an iconic backdrop of the Golden Gate Bridge, San Francisco, Marin Headlands, and the California coast.

The Site is located at Hawk Hill, or Battery Construction 129, in the Control Area of the San Francisco Defense Area Site 87 (SF-87C). SF-87C was constructed on top of Battery Construction 129 on Fort Barry at Hawk Hill. In 1942, the United States Army Corps of Engineers (USACE) began construction on Battery 129, a casemated battery, which consisted of a network of tunnels, casements, and a battery commander's station, that was intended to service two 16-inch guns. Battery 129 was never armed or deployed. Figure 2 provides a general layout of the Site.

NPS is currently planning Phase 3 of the Hawk Hill Visitor Improvement Project, which is part of a larger effort to address visitor safety, create accessible trails, and improve resources. Phase 1 of the Visitor Improvement Project was completed in 2017, and Phase 2 is planned to be implemented in 2021. Phase 3 will rehabilitate historic structures, including the Nike Site SF87C Target Tracking Radar Platforms, improve sustainability and accessibility of overlooks and seating, expand educational opportunities through enhanced wayfinding and interpretive materials, and protect natural and cultural resources. This project improves visitor safety and universal accessibility, rehabilitates historic structures, and facilitates park programming.

Planning efforts for Phase 3 included site investigations to learn more about contaminants on structures and the surrounding soils. As presented in more detail in Section 2.2, the results of site investigations completed between 1992 and 2019 indicate (1) the presence of concentrations of hazardous substances or pollutants in soil above generic screening levels and in building materials along with (2) potentially complete pathways to human and ecological receptors present in the vicinity of the Site. The assessment and possible cleanup of the soil at this Site is designed to protect workers at the Site and the unique habitat which supports a wide array of wildlife, including the endangered Mission blue butterfly.



2.2 Previous Environmental Studies and Response Actions

Both the NPS and the USACE have conducted site characterization activities at this Site and adjacent sites also associated with Fort Barry. The USACE summarized their efforts to investigate the Site and nearby areas in a Records Research Report (RRR; TetraTech 2009a), which functions as the CERCLA Preliminary Assessment (PA) and Site Inspection (SI). Portions of sites identified and investigated by the NPS are called Administrative or Operable Units whereas USACE nomenclature is Area of Investigation (AOI). The following provide summaries of the site characterization activities performed by both USACE and NPS.

2.2.1 USACE Investigation Activities

The USACE investigation activities involved the following identified AOIs, as summarized in the following sections.

2.2.1.1 Fuel Oil Storage Tank at Building S-785

Former building S-785 had been identified as a 275-gallon steel fuel oil storage tank on a map of the facility and building inventory. Prior assessments could not determine whether this tank was an aboveground storage tank (AST) or underground storage tank (UST).

In 2009, exploratory excavations were performed on all four sides of the 8-foot x 9-foot concrete pad that still remains at the site of Building S-785. One 2-inch-diameter pipe was identified protruding from the eastern end of the concrete pad. No evidence suggesting the presence of a UST, including vent or return lines, was identified and no visual evidence of contamination was observed. As such, no sampling was completed, and no further action was proposed.

2.2.1.2 5,000-Gallon Fuel Oil UST at Building S-789

A 5,000-gallon fuel oil UST (a/k/a UST 061 or Tank F-9) was located at the former Nike SF-87C. This tank was removed in 1992. Soil samples collected at the time identified concentrations of diesel range total petroleum hydrocarbon (TPH_{dro}).

In 2003, additional soil samples were collected to further characterize the area. Elevated TPH_{dro} concentrations were identified. In 2009, an additional soil boring in the vicinity of the former UST to assess whether elevated TPH_{dro} concentrations still existed. No further action was proposed by the USACE; however, the planned EE/CA will include a review of the results of this investigation.

2.2.1.3 Former Distribution Transformer at Building S-781

A distribution transformer was formerly located on a concrete pad at Building S-781. The transformer was removed at an unknown date. No staining was observed on the concrete pad. One wipe sample of the concrete pad surface and four surface soil samples adjacent to the pad were collected. Each sample was analyzed for polychlorinated biphenyls (PCBs).



PCBs were not detected in the wipe sample and only Aroclor-1260 was detected in the surface soil samples. The Aroclor-1260 concentration was below the applicable criterion used at the time of the evaluation.

2.2.1.4 Suspected Fuel and Waste Oil Tanks at Battery 129

The construction plan for Battery 129 (dated 1942) depicted two fuel oil tanks along Conzelman Road. In addition, the 1943 Power Room Space Arrangement for Battery 129 depicted two additional 150-gallon fuel oil day tanks, one waste oil tank and three diesel generators inside the power room. The extent of construction at Battery 129 has not been determined, as the NPS typically only has access to USACE designs and plans, not as-built drawings. Sources indicated that these features were either never installed, or, if installed, were removed by the U.S. Army before the Site was transferred to the NPS.

2.2.1.5 Other Historic Structures

According to a 1943 site plan, two fuel tanks (Fuel Tank 1 and Fuel Tank 2), a septic tank with associated sludge disposal box, and drain lines were noted at the Site. The tanks were approximately 9 feet in diameter by 16 feet long (approximately 8,000 gallons). Both tanks were observed to be in good condition, empty and disconnected from the piping that entered the vaults. Rainwater was observed in each vault. According to the USACE, no signs of oil sheen or “odors of fuel” were detected, and the USACE collected no samples. According to available records, the septic tank and associated features identified on the 1943 site plan have not been investigated.

2.2.2 NPS Investigation

In addition to the AOIs identified by the USACE, the NPS conducted additional sampling in order to preliminarily assess soil and sediment quality in select areas of the Site. Select building materials testing/sampling and biological assessments were also conducted. Summaries of these activities are presented in the following sections.

2.2.2.1 Sediment at Casemate 1 Gun Pit

On September 4, 2013, Treadwell and Rollo collected one four-point composite sample of sediment deposited within the Casemate 1 Gun Pit (CO-COMP). Certain metals (i.e., arsenic, lead, and vanadium) were identified at concentrations exceeding the applicable criteria.

2.2.2.2 Building Material and Additional Soil Characterization Activities

Building material and additional soil characterization activities were completed in 2012, 2013 and 2018. Overall, the following conditions were noted:

1. The presence of asbestos in some materials used to construct Site structures;
2. The presence of lead and PCBs in paint on select structures and elevated lead concentrations in soil adjacent to these structures;



3. Treated lumber with elevated metals concentrations;
4. Elevated metals, PCBs, and herbicide concentrations in surface soil near a stormwater outfall; and
5. Elevated metal concentrations in sediment inside the Casemate 1 Gun Pit.

2.2.2.3 Ecological Assessments

Several biological assessments have been completed at the Marin Headlands as part of road and trail construction planning. Most importantly, the Site represents an important habitat for the Mission blue butterfly¹, a species listed as endangered and protected under the Endangered Species Act of 1973. The butterfly requires certain host plants for survival, including the silver lupine (*Lupinus albifrons*), which is found throughout the Site. A non-native tree removal project was completed in 2012 to protect and expand Mission blue butterfly habitat. The non-native tree removal had some impacts to the avian community composition and abundance.

2.3 Current and Future Site Activities

The results discussed above in Section 2.2 indicate further characterization, possible cleanup, and declaration of the Site to be of potential environmental concern may be warranted. Based on these findings, NPS has determined that the use of agency authority to investigate, abate, prevent, minimize, stabilize, mitigate, and/or eliminate the release or threat of release of hazardous substances, pollutants, or contaminants at or from the Site is appropriate.

Specifically, an EE/CA shall be prepared to characterize the nature and extent of hazardous substances, pollutants, or contaminants at the Site. As discussed in the EE/CA Approval Memorandum (NPS 2019), the NPS has determined that a non-time critical removal action is required at the Site based on previous site characterization. The EE/CA also is required to develop and evaluate a range of cleanup alternatives for the Site if unacceptable risk to human health or the environment is found. Collection and analysis of additional samples from the Site may also be necessary to support the EE/CA and final removal action decision-making.

¹ <https://www.parksconservancy.org/conservation/mission-blue-butterfly>.



3.0 COMMUNITY BACKGROUND

This section provides general information regarding the community profile (Section 3.1), history of community involvement activities associated with the Site (Section 3.2), and potential community concern/needs (Section 3.3).

3.1 Community Profile

The GGNRA was established by Congress in 1972 to offer a national park experience to a diverse urban population.² GGNRA welcomes over 17 million visitors a year and contains attractions such as Alcatraz Island, Crissy Field, the Marin Headlands, and Rancho Corral de Tierra. Over half the North American avian species and nearly one-third of California's plant species are found in the park. Hawk Hill is known best for its panoramic vistas of the Pacific Ocean and the Golden Gate Bridge accessed via the popular Conzelman Road scenic drive. The Golden Gate Raptor Observatory monitors the fall raptor migration from Hawk Hill. Hawk Hill and the surrounding grassland provide habitat for the Mission blue butterfly. For these reasons, Hawk Hill attracts a high volume of both local and tourist populations, as well as regular volunteers.

The City of San Francisco is situated approximately 2 miles southeast of Hawk Hill, across the San Francisco Bay, and covers approximately 47 square miles. The City of San Francisco is home to approximately 880,000 people according to 2018 Census estimates.³ The population consists primarily of white (46.7%), Asian (34.2%), Hispanic or Latino (15.2%), and black or African American (5.2%) persons. The Bay Area is known as a global center of science and arts, with headquarter offices for many other tech-based companies/startups. San Francisco is known for its high per capita income. The City of San Francisco's government is run by several departments that are overseen by the Mayor's office, the City Administrator's office, and the Board of Supervisors.⁴

The City of Sausalito is situated approximately 2 miles northeast of Hawk Hill. The City of Sausalito is located in Marin County, approximately 2 miles north of the Golden Gate Bridge. The City of Sausalito is 2.3 square miles in area and home to approximately 7,000 people, according to 2018 Census estimates.^{5,6} The population consists primarily of white (92.7%), Hispanic or Latino (6.8%), and black or African American (1.5%) persons. The City of Sausalito is run by a City Council that includes a Mayor, Vice Mayor, and Council members. These governing officials are part-time elected officials that serve a four-year term.

² <https://www.nps.gov/goga/learn/index.htm>

³ <https://www.census.gov/quickfacts/fact/table/sanfranciscocitycalifornia,US/PST045218>

⁴ <https://sf.gov/departments>

⁵ <https://www.sausalito.gov/our-city/about-the-city-of-sausalito>

⁶ <https://www.census.gov/quickfacts/fact/table/sausalitocitycalifornia,sanfranciscocitycalifornia,US/PST045218>



3.2 Community Involvement History

The following community involvement activities have occurred since 2008:

- From 2008 to 2011 there was significant community engagement in preparation for a non-native invasive tree removal project. The invasive tree removal project served as mitigation for impacts to Mission blue butterfly habitat from the Project Headlands road improvement project. The tree removal project was designed to restore native coastal scrub and grassland to improve and connect the Mission blue butterfly habitat, protect historic structures, and restore the historic viewshed. The non-native tree removal was completed in early 2012.
- Community engagement activities for the planned Visitor Improvement Project were also conducted between 2008 and 2010. The Visitor Improvement Project is the current project planned to improve the Site (i.e., create accessible trails and overlooks, upgrade seating, install railings for safety, and rehabilitate historic structures).
- Community engagement for the Visitor Improvement Project has continued since 2010 with a focus on the upcoming project phases. For the new trail alignment completed in 2017 (Phase 1 of the Visitor Improvement Project), signs were posted at the Site, and NPS Communications staff notified applicable stakeholders (i.e., Golden Gate Raptor Observatory, Nature Bridge, Point Bonita YMCA, and Marin Headlands Visitor Center).
- In addition to community involvement to review projects, there are several ongoing public programs at Hawk Hill:
 - Golden Gate Raptor Observatory (GGRO) engages with volunteers who count raptors during the fall migration from Hawk Hill every day from August to mid-December. In addition, GGRO brings out school groups and has weekend docent programs.
 - Nature Bridge and the Marin Headlands YMCA bring youth to Hawk Hill for environmental education.
 - NPS Maintenance staff host site cleanup events with volunteers, which include painting over graffiti and picking up debris.
 - The NPS Habitat Restoration Team (HRT) has hosted vegetation management volunteer days, mostly focused on non-native invasive species removal.
 - Other groups conduct regular field trips to the Site including Marin Audubon, Sierra Club, California Native Plant Society, and military history tours.

NPS will establish an online information repository in Fall 2020, which will include the administrative record index and as much of the administrative record file as is feasible. The administrative record file contains all information used by the lead agency to make its decision on the selection of a response action. The online information repository will be accessible at the following address: https://parkplanning.nps.gov/hawk_hill_haz_manage



Some documents which are part of the Administrative Record will not be posted online in the online information repository but will be available by request. Requests for electronic versions of documents should be sent to GOGA_Public_Affairs@nps.gov.

Due to the current public health concerns related to the COVID-19 pandemic, and pursuant to local health department orders, the online information repository will be the primary means of accessing project-related documents. Hardcopy documents will be made available by individual request only. Those who wish to request a hardcopy document from the administrative record should send their request to GOGA_Public_Affairs@nps.gov.

3.3 Community Concerns and Needs

Identifying community concerns and issues is a vital step in the CIP's development, and depending on the scope and scale of the project, it may be appropriate to solicit public recommendations on how NPS can most effectively involve and communicate with the community. Because the EE/CA and anticipated removal action will have a very limited scope away from residences and communities, NPS does not have plans to conduct community interviews at this time.



4.0 PLANNED COMMUNITY INVOLVEMENT ACTIVITIES

As noted earlier, the key objectives of the community involvement program are to establish, encourage, and maintain communication between NPS and the community and provide opportunities for the public to provide input throughout the course of CERCLA response activities at the Site. The following methods and techniques will be used to promote public participation and establish steps to provide timely information to interested citizens, agency staff, government officials, the media, and the community at large. The first part of this section describes each community involvement activity and the second part provides a schedule for when those activities will occur.

Important: Upon request, NPS will endeavor to meet identified needs for translation, access to electronic communications, disability access, or other accommodations for people with special needs.

4.1 Communication Methods and Community Involvement Activities

4.1.1 Communication Methods and Community Involvement Activities

The following personnel will support any future community involvement activities and communication methods when such activities are identified or planned. Specific contact information for personnel noted below is provided below and in Appendix C.

Site Spokesperson/Public Information Office (PIO)

Charles Strickfaden, Chief of Communications, External Affairs, and Special Park Use is the designated NPS spokespersons who will inform the community of actions taken, respond to inquiries, provide information concerning the Site, and act as liaison between the NPS and community members, environmental groups, government officials, the media, and other interested parties.

Fort Mason, Building 101
San Francisco, CA 94123
(415) 561-4730
GOGA_Public_Affairs@nps.gov

4.1.2 Administrative Record File and Information Repository

The administrative record file is housed in the online information repository and contains site environmental investigations and reports and other information that NPS considers or relies upon in the response action selection process. NPS will update the administrative record file at key points during the removal action process, such as when important investigations and reports are completed. Appendix B provides details for the administrative record file and information repository.



The administrative record file and information repository will be located at:
https://parkplanning.nps.gov/hawk_hill_haz_manage

Specific document requests related to the administrative record should be addressed to
GOGA_Public_Affairs@nps.gov.

4.1.3 Interested Parties Mailing List

NPS maintains an interested-parties mailing list that includes federal, state, and local elected officials; local school district officials; selected agency staff; community groups; media contacts; and interested community members. NPS notifies the parties on the list whenever key documents are published or the status of Site changes. In accordance with NPS's sustainability efforts, whenever possible mailings will be sent electronically by email, with hyperlinks to documents posted on the website. However, interested parties can request conventional mail delivery if access to electronic communication is not available. In such cases, the NPS will send a letter informing interested parties of the availability of documents at the information repositories.

Efforts are ongoing to expand the mailing list. Individuals can be added to the mailing list by contacting the site spokesperson/public information officer (see Appendix C for contact information). NPS also offers sign-up opportunities at public meetings and via NPS's Planning, Environment, and Public Comment (PEPC) website. The NPS updates the mailing list as appropriate to reflect changes in government representatives and other contacts. Note that contact information for private individuals on the list will be kept confidential to protect the personal information of those individuals.

4.1.4 Public Comment Periods

The PIO/site spokesperson will ensure the administrative record index is available for public review on the PEPC website (https://parkplanning.nps.gov/hawk_hill_haz_manage). Those who are interested in accessing a document from the administrative record, should send their request to GOGA_Public_Affairs@nps.gov. The PEPC website will be set up to receive comments.

While NPS accepts comments on ongoing response activities from the public at any time, at certain times a formal public comment period will be provided. A public comment period is a formal time period during which the NPS accepts comments from the public on specific proposed actions or decisions. Generally, public comment periods last for 30 days, although they may be longer. Upon timely request (preferably to the Site spokesperson and in writing) during any public comment period, the NPS will extend the public comment period by a minimum of 15 days. In addition, upon request, the NPS will meet identified needs for translation, access to electronic communications, or other accommodations for persons with special needs (see Section 4.1.5, below).

For this project, the NPS will formally notify the community of public comment periods through several means:



- The NPS will publish notice of public comment periods in the *Marin Independent Journal*.
- The NPS will place notice of public comment periods on the Site PEPC website.
- The NPS will notify individuals listed on the Interested Parties Mailing List.
- The NPS will post news releases on the park website.

Public comments will be requested upon the completion of the EE/CA Report. Following the close of a formal public comment period, the NPS will prepare written responses to significant public comments *received during the public comment period* (called a “responsiveness summary”); the responsiveness summary will be added to the administrative record file and be available for public review.

4.1.5 Public Notices

The NPS will issue public notices to inform the community and the general public of public events, publication of key documents, and major project milestones. NPS will share public notices in three main ways: 1) via notices in the *Marin Independent Journal*; 2) via Community Updates sent via email to the Interested Parties mailing list; and 3) via the NPS PEPC website. See sections 4.1.7 and 4.1.10 for more information.

The NPS will issue public notices in the *Marin Independent Journal* indicating that the EE/CA Approval Memorandum is signed and that the information repository and administrative record file are available. A public notice announcing the findings and recommendations of the EE/CA Report and the opportunity for the public to review and provide comments on the EE/CA Report will also be announced in the *Marin Independent Journal*. The notice will provide a brief description of the EE/CA Report, announce its availability for review, and list the dates of the 30-day public comment period. A contact person will also be identified, and it will list the locations where the Report (and administrative record file) can be reviewed. Finally, it will identify where written comments should be sent.

4.1.6 Public Meetings

Public meetings may be scheduled to communicate directly with the public about key project milestones. Public meetings are usually fairly structured forums that are open to the general public, including both affected and unaffected parties. Public meetings typically include an NPS staff presentation followed by a question, answer, and comment session.

Currently, NPS does not anticipate holding a public meeting for this project. A virtual meeting for identified stakeholders will likely be held at the same time as the public comment period, and a notification of this meeting will be issued via email.

If the need arises or a request is received for a public meeting(s), the meeting location(s) and date(s) will be announced as described in Section 4.1.5 above. Any public meetings held during a formal public comment period will be recorded and transcribed, and the transcript will



be made available in the administrative record file. As noted above in Section 4.1.4, the NPS's responses to significant oral or written comments made during a public meeting ("responsiveness summary") will be compiled and placed in the administrative record file.

In addition to the structured public meetings, NPS may hold public briefings prior to field work to inform the public of the nature, scheduling, and likely impacts of the upcoming activities, as well as to receive any suggestions on alleviating such impacts.

To date, no requests have been made to provide a translator; however, NPS will take steps to accommodate such requests as well as those for individuals with special needs, as appropriate.

4.1.7 Newspaper Contacts/News Releases

Currently, public notices will be issued in the *Marin Independent Journal* at two specific project milestones: (1) when the EE/CA Approval Memorandum is signed and administrative record file is available, and (2) when the draft EE/CA Report has been issued and released for public review and comment. The notice will provide a brief description of the EE/CA Report, announce its availability for review, and list the dates of the 30-day public comment period. A contact person will also be identified, and it will list the locations where the Report (and administrative record file) can be reviewed. Finally, it will identify where written comments should be sent.

As necessary, the PIO/site spokesperson, will maintain regular contact with the appropriate reporter to ensure that factual and consistent project information is available to the newspaper when needed. News releases and community updates will also be posted on the Park's web page and via PEPC to ensure the distribution of accurate and timely information.

4.1.8 Community Organization Presentations

If requested, the NPS will meet with interested community organizations or provide information for community organizations to include in their newsletters. Interested community organizations can discuss community organization presentations by calling or emailing the PIO/site spokesperson. Currently, no formal presentations are anticipated.

4.1.9 Park Visitor Communication

The NPS has determined based on past experience that the most effective way to provide Site information to Park visitors will be to draft and share talking points and answers to frequently asked questions with staff at the Marin Headlands Visitor Center, Fort Baker Lodge, Marine Mammal Center, and with the front desk at GOGA Headquarters at Fort Mason. These are the most likely locations for casual visitors or neighbors to go with questions, whether in person (during active facility business hours) or by phone/email. The staff at these locations will be given information to answer simple questions and will direct more complex questions to the PIO/site spokesperson.



4.1.10 Community Updates

Community Updates are brief documents to inform the community about the Site and the environmental investigation and cleanup process. Community Updates present information about Site history, the nature and extent of site-related contamination, public health and safety issues, investigation and/or cleanup plans, processes, and schedules, and local impacts during cleanup activities. Community Updates also provide contact information for public inquiries.

The NPS will prepare Community Updates at key project milestones in the cleanup process. Currently, NPS anticipates preparing Community Updates at the following milestones:

- (1) When the administrative record file is made available to the public, announcing that the EE/CA is being performed, and sharing location of information repositories.
- (2) When the draft EE/CA Report is available for public review and comment
- (3) After the issuance of the Action Memorandum (the removal action decision document) and the completion of response action design (prior to the initiation of response action)
- (4) At the completion of the removal action.

The NPS will distribute Community Updates to the public using one or more of the following means:

- Posting Community Updates on the PEPC website (https://parkplanning.nps.gov/hawk_hill_haz_manage)
- Place news releases on Park website
- Sending a notice to persons on the Interested Parties Mailing List with either a hyperlink to (for email notices) or a copy (for regular mail notices) of the Community Update
- Making Community Updates available via inquiry to staff at Fort Baker Lodge, Marine Mammal Center, and with the front desk at GOGA Headquarters at Fort Mason.

4.1.11 Site/Project-Related Websites

NPS has established a PEPC website to provide information regarding the Site (https://parkplanning.nps.gov/hawk_hill_haz_manage). This website will be used to post general information regarding the Site as well as key cleanup and community involvement documents. The PEPC website (https://parkplanning.nps.gov/hawk_hill_haz_manage) will also be used to host project-related documents for public review and comment.



4.1.12 Contact Information

NPS contact information will be included in Community Updates, public notices, media advisories, and on the PEPC website (https://parkplanning.nps.gov/hawk_hill_haz_manage). The contact information for the PIO/site spokesperson is included above. Contact information for NPS representatives as well as for other key individuals is provided in Appendix C, Contact Information.

4.1.13 Community Involvement Plan Revisions

To remain flexible and in order to be able to respond to the evolving needs of the community and changes to the Site, the CIP will be reviewed and revised as needed, and posted on the PEPC website (https://parkplanning.nps.gov/hawk_hill_haz_manage). As the response action progresses, NPS staff may identify and use additional means or activities to inform and engage the community.

4.2 Community Involvement Activity Summary

The NPS selected the above methods and activities to engage and inform the community regarding the Site and project-related activities. This section shows the order of the steps that will be taken to ensure the community is informed and involved during the Hawk Hill CERCLA response action.

Community Involvement Activity

1. Issue Community Involvement Plan.
2. Public Notifications in *Marin Independent Journal* and Community Updates sent to Interested Parties Mailing List.
3. Provide FAQs and Community Updates at select locations.
4. Issue draft EE/CA Report for public review/comment period.
5. Finalize EE/CA Action Memo, including design of response action, and Issue Community Update.
6. Finalize Implementation of Non-Time Critical Response Action and Issue Community Update.



5.0 REFERENCES

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- Roth/LaMotte Landscape Architecture and Preservation Architecture. 2008. Battery Construction 129, Hawk Hill, Historic Structures Report. September 17.
- Tetra Tech, Inc. 2009a. Final Records Research Report, Former Fort Barry, FUDS Number J09CA3107. December 30.
- Tetra Tech, Inc. 2009b. Site Inspection Report, Former Fort Barry, FUDS Number J09CA3107.
- Tetra Tech, Inc. 2009c. Final Records Research Report, Former Fort Cronkhite, FUDS Number J09CA3111.
- Tetra Tech, Inc. 2009d. Site Inspection Report, Former Fort Cronkhite, FUDS Number J09CA3111. December.
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- USEPA. *Community Involvement Toolkit*. Available at <http://www.epa.gov/superfund/community/toolkit.htm>.



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Weiss Associates. 2019b. Site Management Plan for Golden Gate National Parks Conservancy, Hawk Hill, Marin Headlands, California. May 29.

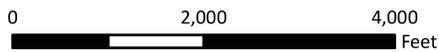


FIGURES



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File: K:\GIS\Proj\0151.006 Hawk Hill\20190726\Site Location.mxd 7/26/2019 Created by: JD Checked by: Initial Coordinate System: NAD 1983 StatePlane California III FIPS 0403 Feet



1 inch = 2,000 feet



Legend

 Site Location

Base Map: USGS San Francisco North (1995) 7.5 Minute Quadrangle.

SAFETY FIRST



CLIENT:
Golden Gate National Park Conservancy

PROJECT: Hawk Hill
Marin Headlands, CA

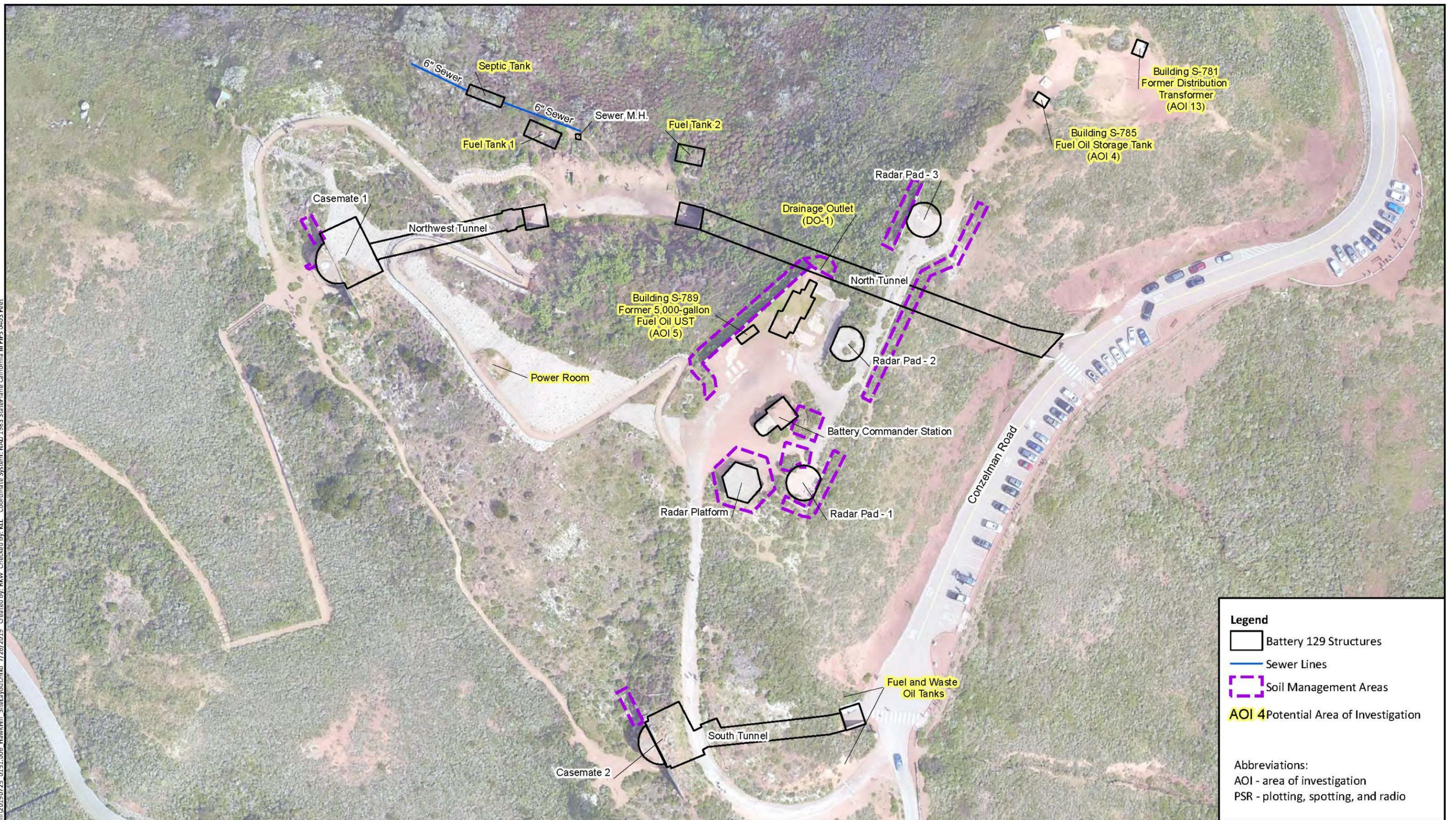
PROJECT NUMBER: 0151.006.001

Site Location

FIGURE 1

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File: K:\GIS\PA\0151.006 Hawk Hill_SiteLayout.mxd Created by: RKW Checked by: RLL Coordinates System: NAD 1983 StatePlane California III FIPS 4003 Feet

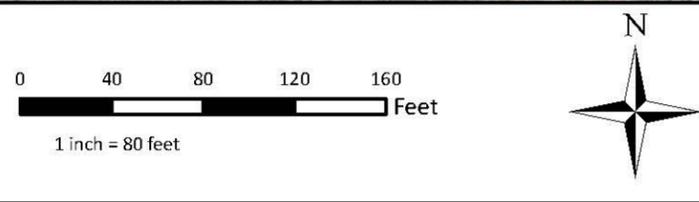


Legend

- Battery 129 Structures
- Sewer Lines
- Soil Management Areas
- AOI 4 Potential Area of Investigation

Abbreviations:
 AOI - area of investigation
 PSR - plotting, spotting, and radio

Notes: Aerial imagery source - GoogleEarth March 2018



| | | |
|---------------------|--|--------------------|
| SAFETY FIRST | CLIENT: Golden Gate National Park Conservancy | Site Layout |
| | PROJECT: Hawk Hill Marin Headlands, CA | |
| | PROJECT NUMBER: 0151.006.001 | |

FIGURE 2

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APPENDIX A: GLOSSARY

Definitions for CERCLA-related words found throughout the CIP are provided below.

Administrative Record File: A file that contains all information considered or relied upon by the lead agency to make its decision on the selection of a response action under CERCLA. See Section 4.1 for further information on the Site administrative record file.

CERCLA (Comprehensive Environmental Response, Compensation, and Liability Act): A federal law, commonly known as “Superfund,” which Congress enacted in 1980 and amended in 1986 and 2002. The law provides broad federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or welfare or the environment; establishes the categories of persons who are liable for such releases; and outlines a framework for investigating and responding to releases and threatened releases of hazardous substances where the lead agency determines it is necessary. CERCLA generally authorizes three types of cleanup actions: emergency response actions, removal actions, and remedial actions.

Cleanup: Used in this document to describe actions taken to address a release or threat of a release of hazardous substances, pursuant to CERCLA, that could affect public health or welfare or the environment. The word “cleanup” is sometimes used interchangeably with the terms remedial action, removal action, response action, remedy, remediation, or corrective action.

Community Interview: Interviews conducted by the lead agency as part of the process of preparing a Community Involvement Plan. For most response actions, the NCP requires the lead agency to conduct community interviews to determine appropriate activities to ensure public involvement in Site-related decisions.

Community Involvement Plan (CIP): A plan that explains how NPS intends to enable meaningful community involvement throughout the cleanup process by specifying planned community involvement activities to address community needs, concerns, and expectations identified through community interviews and other means.

Hazardous Substance: Any one of the more than 800 substances defined under CERCLA and the NCP as potentially posing a threat to human health or the environment. Hazardous substances include materials defined as ignitable, corrosive, reactive, or toxic under the Resource Conservation and Recovery Act (RCRA), as well as additional substances listed under the Clean Water Act and hazardous air pollutants listed under the Clean Air Act.

Information Repository: A location open to members of the general public where a collection of documents (including the administrative record file) relevant to a particular CERCLA Site is made available for public review and copying. See Section 4.1.2 for the locations and addresses of the Hawk Hill information repositories.

Lead Agency: The government agency with the primary authority to investigate, plan, and implement a response action under CERCLA and the NCP at a particular site.



National Oil and Hazardous Substances Pollution Contingency Plan (NCP): More commonly called the National Contingency Plan or NCP, it is the federal government's regulatory blueprint for responding to both oil spills and releases and threatened releases of hazardous substances. The NCP is the result of our country's efforts to develop a national response capability and promote overall coordination among the hierarchy of responders and contingency plans. The regulations, published at 40 C.F.R. Part 300, detail how CERCLA is to be implemented.

Non-Time-Critical Removal Action: A removal action conducted when the lead agency determines that there is a planning period of at least six months before on-site activities must be initiated.

Notice of Availability: A formal notice announcing the issuance and public availability of a document (e.g., proposed plan) or documents (e.g., the administrative record file or updates thereto). A Notice of Availability is also issued when the information repositories are established. The notice may also announce commencement of a public comment period.

Public Comment Period: A period during which the public can formally review and comment on various documents and proposed response actions.

Removal Action: A type of CERCLA response action with a streamlined planning process. A removal action is conducted to address all or a part of a release or threatened release of hazardous substances when the release requires an expedited, time-critical response, or when the release is of limited size and complexity such that streamlined response planning is appropriate. There are two types of removal actions – time-critical and non-time-critical; sometimes emergency response actions (undertaken by the U.S. Environmental Protection Agency) are referred to as removal actions. The term refers both to the entire removal response action, as well as just the cleanup phase of such an action.

Response Action: The most general CERCLA term used to describe any action taken to respond to a release or threatened release of hazardous substances to protect the public health or welfare or the environment. The term includes all phases of the response, from investigation through monitoring and even enforcement activities. There are generally three types of CERCLA response actions that may be undertaken by NPS as the lead agency: time-critical removal actions, non-time-critical removal actions, and remedial actions. The response action at Hawk Hill is a non-time-critical removal action.

Responsiveness Summary: Document summarizing the significant comments received during a public comment period and documenting the lead agency's responses to the comments.

Site: The Battery 129/NIKE SF-87C (Hawk Hill) which comprises the area contaminated or potentially contaminated by a release or threatened release of hazardous substances. The Site is located in the Control Area of the San Francisco Defense Area Site 87 (SF-87C). SF-87C was constructed on top of Battery 129 on Fort Barry at Hawk Hill.



APPENDIX B: ADMINISTRATIVE RECORD FILE AND INFORMATION REPOSITORY DETAILS

The Site administrative record file will be maintained online and may be reviewed at the following address:

https://parkplanning.nps.gov/hawk_hill_haz_manage

Those who are interested in accessing a specific document from the administrative record should send their request to GOGA_Public_Affairs@nps.gov.

Due to the current public health concerns related to the COVID-19 pandemic, and pursuant to local health department orders, the online information repository will be the primary means of accessing project-related documents. Hardcopy documents will be made available by individual request only.



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APPENDIX C: CONTACT INFORMATION

The NPS will update contact information as necessary.

Site-Specific Contacts

For information about site-related cleanup activities, please contact:

| | Site Spokesperson / PIO |
|----------------------|--|
| Name: | Charles Strickfaden |
| Title: | Chief of Communications, External Affairs, and Special Park Use |
| Organization: | National Park Service, Golden Gate National Recreation Area |
| Address: | Fort Mason, Building 101 San Francisco, CA 94123 |
| Phone: | (415) 561-4730 |
| Email: | GOGA_Public_Affairs@nps.gov |

| | NPS Region Contact | NPS Headquarters Contact |
|--------------------------|---|---|
| Name: | Stephen J. Mitchell | Margaret Everson |
| Title: | Operations/Environmental Programs Branch Chief | Counselor to the Secretary |
| Organization: | National Park Service, Pacific West Region | National Park Service |
| Address: | 333 Bush Street – Suite 500, San Francisco, CA 94104 | 1849 C Street NW, Washington, DC 20240 |
| Phone: | (415) 623-2100 | (202) 208-6843 |
| Email or Webform: | https://www.nps.gov/orgs/1180/contact.us.htm | https://www.nps.gov/aboutus/contactinformation.htm |



Elected Official Contacts

Federal Elected Officials

| | Senator | Senator |
|--------------------------|--|--|
| Name: | Dianne Feinstein | Kamala Harris |
| Title: | California Senator | California Senator |
| Address: | 331 Hart Senate Office Building, Washington, DC 20510 | 112 Hart Senate Office Building, Washington, DC 20510 |
| Phone: | (202) 224-3814 | (202) 224-3553 |
| Email or Webform: | www.feinstein.senate.gov/public/index.cfm/e-mail-me | www.harris.senate.gov/contact |

| | House Representative |
|--------------------------|---|
| Name: | Jared Huffman |
| Title: | California District 2 Representative |
| Address: | 1527 Longworth House Office Building, Washington, DC 20515 |
| Phone: | (202) 225-5161 |
| Email or Webform: | https://huffman.house.gov/contact/email-me |

State Elected Officials

| | Governor |
|--------------------------|---|
| Name: | Gavin Newsom |
| Title: | Governor |
| Address: | 1301 10 th Street, Suite 1173, Sacramento, CA 95814 |
| Phone: | (916) 445-2841 |
| Email or Webform: | https://govapps.gov.ca.gov/gov40mail/ |

City Elected Officials

| | Sausalito Mayor |
|-----------------|--|
| Name: | Susan Cleveland-Knowles |
| Title: | Sausalito Mayor |
| Address: | 420 Litho Street, Sausalito, CA 94965 |
| Phone: | (415) 937-1332 |
| Email: | sclevelandknowles@sausalito.gov |



| San Francisco Mayor | |
|---------------------|---|
| Name: | London Breed |
| Title: | San Francisco Mayor |
| Address: | City Hall, Room 200, 1 Dr. Carlton B. Goodlett Place, San Francisco, CA 94102 |
| Phone: | (415) 554-6141 |
| Email: | MayorLondonBreed@sfgov.org |

Federal and State Agencies

| | EPA Region 9 | U.S. Fish and Wildlife Service |
|----------------------|---|---|
| Name: | Mike Stoker | Paul Souza |
| Title: | Regional Administrator | Regional Director |
| Organization: | Pacific Southwest, Region 9 | Pacific Southwest Region Headquarters |
| Address: | 75 Hawthorne Street, San Francisco, CA 94105 | 2800 Cottage Way, Sacramento, CA 95824 |
| Phone: | (415) 947-8000 | (916) 414-6467 |
| Email: | https://www.epa.gov/aboutepa/forms/contact-us-about-epas-organizations | NA |

| | California Department of Public Health | California Environmental Protection Agency (CalEPA) |
|----------------------|---|--|
| Name: | Sonia Y. Angell | Jared Blumenfeld |
| Title: | Director | Secretary of the Department |
| Organization: | California Department of Public Health | CalEPA |
| Address: | P.O. Box 997377, MS 0500, Sacramento, CA 95899 | P.O. Box 2815, Sacramento, CA 95812 |
| Phone: | (916) 558-1784 | (916) 323-2515 |
| Email: | https://www.cdph.ca.gov/Pages/contact_us.aspx | cepacomm@calepa.ca.gov |



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APPENDIX D: NCP COMMUNITY INVOLVEMENT REQUIREMENTS

The NCP specifies the following community involvement requirements for the non-time-critical removal action at this Site:

Non-Time-Critical Removal Action

| Required When | Requirement | Citation– 40 C.F.R. |
|--|---|--|
| | Designate a Site spokesperson. | § 300.415(n)(1) |
| No later than when the Engineering Evaluation and Cost Analysis Approval Memorandum is signed | <ul style="list-style-type: none"> Establish two information repositories (one at a central location and one at or near the Site) and establish an administrative record file and place in the information repositories. Publish notice of availability of the information repositories and the administrative record file in a major local newspaper of general circulation. | § 300.415(n)(4)(i); § 300.800(a); § 300.805(a) § 300.415(n)(4)(i); § 300.820(a)(1) |
| Prior to completion of the Engineering Evaluation and Cost Analysis | <ul style="list-style-type: none"> Conduct community interviews. Prepare and issue a Community Involvement Plan. | § 300.415(n)(4)(i) § 300.415(n)(4)(i) |
| Upon completion of Engineering Evaluation and Cost Analysis and publication of the Engineering Evaluation and Cost Analysis Report | <ul style="list-style-type: none"> Publish notice of availability and brief description of the Engineering Evaluation and Cost Analysis Report in a major local newspaper of general circulation. Provide a public comment period of at least 30 days for submission of written and oral comments. Upon timely request during the public comment period, extend the public comment period by a minimum of 15 additional days. After the close of the public comment period, prepare a written response to significant comments received during the public comment period; consider and respond to significant comments submitted before the public comment period, as appropriate; place any such responses into the administrative record file. | § 300.415(n)(4)(ii); § 300.820(a)(1) § 300.415(n)(4)(iii); § 300.820(a)(2) § 300.415(n)(4)(iv); § 300.820(a)(2) |



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