



October 20, 2008

644.010.01.005

Department of Toxic Substances Control
Region 2, Site Mitigation
700 Heinz Street, Suite 200
Berkeley, California 94710-273

Attention: Mr. Tony Natera

**PROPOSED CAP MAINTENANCE ACTIVITIES
AREA V – SOUTH SHORE AREAS
MARINA BAY PROJECT
RICHMOND, CALIFORNIA**

Dear Mr. Natera:

This letter has been prepared by PES Environmental, Inc. (PES), on behalf of Richmond Community Redevelopment Agency (the Agency), to describe the cap maintenance activities proposed for Area V in the South Shore Areas of the Marina Bay Project in Richmond, California. On October 16, 2008, you requested this letter in a phone conversation with Kyle Flory of PES.

As discussed on October 16, 2008, maintenance activities are proposed to improve the vegetative cover and reduce the potential for erosion of the soil cap at Area V. These activities will be limited to the upper surface of the cap, and will penetrate no more than 1 foot into the existing soil cap. Therefore, at least 3 feet of undisturbed clean fill and 2 feet of bioremediated soil will remain atop the encapsulated petroleum hydrocarbon-affected soil at all times. The proposed maintenance activities will focus on: (1) stabilizing the slope along the southern edge of the encapsulated area; and (2) improving the vegetative cover atop the encapsulated area. These activities are discussed in detail below.

Slope Stabilization

The proposed maintenance for the southern slope of the encapsulated area and erosional feature in the southwest corner of the cap includes importing clean subsoil and topsoil from other City of Richmond property, and placing the fill from the edge of the top of the slope of the capped area, creating a new toe of slope to the side of the current slope, reducing the slope to a maximum 3:1. Reducing the slope will make the area less susceptible to erosion. In order to provide initial stabilization of the imported soil, jute netting will be placed across the area and anchored in-place. The slope will be hydroseeded with a mixture of native bunch grasses and

Mr. Tony Natera
October 20, 2008
Page 2

wildflowers. The existing sprinkler heads in the landscaped area south of the encapsulated area will be modified to water the slope, in order to facilitate germination and rooting of the grasses and wildflowers. Once rooted, the grasses and wildflowers will provide ongoing stabilization of the sloped soil. The seed mix used will contain grasses and wildflowers that typically root no more than 2 feet below ground surface (bgs), in order to ensure that the roots do not penetrate the underlying petroleum hydrocarbon-affected soil.

Vegetative Cover

As noted in a previous cap inspection conducted by DTSC in December 2007 and documented in DTSC's 2008 Annual Inspection Report dated March 26, 2008, the condition of the vegetative cover atop the encapsulated area is slowly deteriorating. Grasses are being replaced by invasive non-native plants, and use of wood chips to cover barren areas has been required. While the cap is functioning effectively at this time, re-vegetation of the upper surface of the cap is expected to reduce future maintenance requirements and result in improved vegetative coverage across the capped area.

The invasive, non-native plants atop the cap will be removed by alternating herbicide (Roundup) applications with tilling of the existing soil cap to an anticipated depth of 6 to 8 inches bgs. Once the weeds are removed, this area will also be hydroseeded with a mixture of native bunch grasses and wildflowers. This work will be conducted during the early part of the rainy season, in order for natural precipitation to assist in seed germination and rooting of the plants. Once established, the native bunch grasses and wildflowers are expected to provide an improved vegetative cover over the encapsulated area.

We trust the proposed maintenance activities are acceptable to DTSC, and look forward to receiving your approval to proceed. The Agency is anxious to proceed with the maintenance activities as soon as possible in order to stabilize the southern slope prior to the start of the rainy season and to take advantage of upcoming rains to assist in germination and rooting. If you have any questions regarding the proposed activities, please contact Ann Loomis at (909) 624-8145 or Kyle Flory at (415) 899-1600.

Very truly yours,

PES ENVIRONMENTAL, INC.



Ann Loomis, P.E.
Senior Engineer



Kyle S. Flory, P.G.
Principal Geologist

cc: Alan Wolken, Richmond Community Redevelopment Agency