

Proposal Reviews

#133: Peninsula Sportsmen's Club, Salt Pond Remediation

San Francisco Public Utilities Commission

Research and Restoration Technical Panel Review

Bay Regional Review

External Scientific Review #1
#2
#3

Environmental Compliance

Budget

Research and Restoration Technical Panel Review:

CALFED Bay-Delta 2002 ERP PSP Research and Restoration Technical Panel Review Form

Proposal Number: 133

Applicant Organization: San Francisco Public Utilities Commission

Proposal Title: Peninsula Sportsmen's Club, Salt Pond Remediation

Review:

Please provide an overall evaluation summary rating:

Superior: outstanding in all respects;

Above Average: Quality proposal, medium or high regional value, and no significant administrative concerns;

Adequate: No serious deficiencies, no significant regional impediments, and no significant administrative concerns;

Not Recommended: Serious deficiencies, significant regional impediments or significant administrative concerns.

Overall Evaluation Summary Rating	Provide a brief explanation of your summary rating
-Superior	There were numerous regulatory, budget and regional concerns, such as needing approved permits and adequate time to conduct the CEQA documents. In addition, the scientific panel reviews had major concerns, such as the lack of proper sampling detail, lack of performance measures and lack of justification for needing to remove the soil rather than capping the site.
-Above average	
-Adequate	
XNot recommended	

1. **Goals and Justification.** Does the proposal present a clear statement of goals, objectives and hypotheses? Does the proposal present a clear justification and conceptual model for the project?

The goal is clear, to perform remediation of the lead shot from the former Sportmens Club. Justification is clear that lead is a toxicological hazard to birds and a concern in the sediment. However, does the project justify the approach of removing the contained sediment rather than capping and abandon the site. The one reviewer gave a favorable review because he was interested building a database for other lead contaminated sites in the states of Oregon and Washington.

2. **Likelihood of Success (Approach, Feasibility, Capabilities and Performance Measures).** Is the project likely to succeed based on the approach, feasibility and project team capabilities? Are the proposed performance measures adequate for measuring the project's success?

Very little documentation was provided on performance measures. No detail was provided on water quality, sediment testing and benthic fauna sampling. No information was provided on number of samples to be collected, when, where to collect samples. Justification was needed by citing papers on other sites and indication of the success or failures rates.

3. **Outcomes and Products.** Will the project advance the state of scientific knowledge in general and/or make an important contribution to the state of knowledge of the Bay-Delta Watershed? For restoration proposals, is the project likely to contribute to ecosystem restoration or species recoveries in a significant way? Will the project produce products useful to decision-makers and scientists?

The only product is improved water quality. One reviewer questioned the teams capabilities for this project?

4. **Cost/Benefit Comments.** Is the budget reasonable and adequate for the work proposed?

Some question about where the rest of the funds will be obtained for the entire project. The total project is for \$14.6M with \$5M from CALFED. San Francisco PUC is listed as a cost sharer for \$920,000.

5. **Regional Review.** How did the regional panel(s) rank the proposal (High, Medium, Low)? Did the regional panel(s) identify significant benefits (regional priorities, linkages with other activities, local involvement) or impediments (local constraints, conflicts with other activities, lack of local involvement) to this proposal? What were they?

The regional review ranked it low. Project had limited scope and benefit to resources beyond other Bay Area proposals. It is not responsive to the Restoration priorities of the bay area. Proposal didnt involve local organizations.

6. **Administrative Review.** Were there significant concerns about the proposal with regard to the prior performance, environmental compliance and budget administrative reviews? What were they?

Total project is for \$9.6M with \$5M from CALFED. Permits may be necessary such as State Lands Commission Land Use Lease, Encroachment permit, and land use rezone permit. More time may be needed for the adoption of the CEQA documents.

Miscellaneous comments:

None

Bay Regional Review:

Proposal Number: 133

Applicant Organization: San Francisco Public Utilities Commission

Proposal Title: Peninsula Sportsmen's Club, Salt Pond Remediation

Overall Ranking: Low -Medium -High

Provide a brief summary explanation of the committee's ranking:

Project of limited scope and limited benefit to biotic resources compared to other Bay Region proposals. Activities are in response to regulatory requirements to remediate site. Threat to fish and wildlife from the presence of spent lead shot and targets not demonstrated. Upon completion of remediation no material habitat enhancement would have occur in the form of new wetlands or enhanced habitat.

1. Is the project feasible based on local constraints?

Yes -No

How?

Feasible - the excavation/off-haul technique is standard method of remediating contaminated soils.

2. Does the project pursue the restoration priorities applicable to the region as outlined in the PSP?

-Yes XNo

How?

The proposal is not responsive to the Restoration Priorities of the Bay Region. Proposal only vaguely responsive to Multi-Region priorities related to contaminants (Ensure that poor water quality doesn't impair restoration).

3. Is the project adequately linked with other restoration activities in the region, such as ongoing implementation projects and regional planning efforts?

-Yes XNo

How?

Proposal is a stand-alone remediation project. No letters of support, no stakeholder group mentioned or public out reach. Cooperators identified are representatives from regulatory agencies.

4. Does the project adequately involve local people and institutions?

-Yes XNo

How?

Does not involve local organizations, scientific, non-governmental or educational.

Other Comments:

Committee was concerned that the proposed remediation exceeded the threat to fish and wildlife and that other approaches to remediating the site should be considered which would result in enhancement of the site. What is being pursued in the proposed project is a standard regulatory response to a contaminated site.

External Scientific: #1

Research and Restoration External Scientific Review Form

Proposal Number: 133

Applicant Organization: San Francisco Public Utilities Commission

Proposal Title: Peninsula Sportsmen's Club, Salt Pond Remediation

Conflict of Interest Statements:

I have no financial interest in this proposal.

XCorrect

-Incorrect

In the blank below please explain any connection to proposal, to applicant, co-applicant or subcontractor or to submitting institution (write "none" if no connection):

None

Review:

Please provide an overall evaluation summary rating:

Excellent: outstanding in all respects;

Good: quality but some deficiencies;

Poor: serious deficiencies.

Overall Evaluation Summary Rating	Provide a brief explanation of your summary rating
-Excellent	This project has a narrow scope for the applications to the CALFED program. Is this approach the best for removing lead from the sediments at a high cost. The proposal lacked proper citation of sampling methods, QA/QC procedures and level of protection that is needed to protect aquatic benthic organisms and birds.
-Good	
XPoor	

1. **Goals.** Are the goals, objectives and hypotheses clearly stated and internally consistent? Is the concept timely and important?

The project goal and objective are clearly stated to remove lead contaminated sediments from lead.

2. **Justification.** Is the study justified relative to existing knowledge? Is a conceptual model clearly stated in the proposal and does it explain the underlying basis for the proposed work? Is the selection of research, pilot or demonstration project, or a full-scale implementation project justified?

The proposal outlines the justification for removal of the sediments, however, it doesnt discuss whether other options were considered?

3. **Approach.** Is the approach well designed and appropriate for meeting the objectives of the project? Are results likely to add to the base of knowledge? Is the project likely to generate novel information, methodology or approaches? Will the information ultimately be useful to decision-makers?

The study clearly outlines the work schedule to be conducted over the 3 year period.

4. **Feasibility.** Is the approach fully documented and technically feasible? What is the likelihood of success? Is the scale of the project consistent with the objectives?

The proposal discusses 2 dredging methods that were considered to remove the affected sediments, however, they don't explain the justification on why they selected the approach that they are recommending. Also, they discuss needing a treatment variance from USEPA but where they are in the process and likelihood of obtaining this variance.

5. **Project-Specific Performance Measures.** Does the project include appropriate performance measures to measure success relative to the project's goals and objectives? Is there enough detail as to how the performance measures will be quantified? For restoration projects, are monitoring plans explicit and detailed enough to determine if performance measures will be adequately assessed?

They fail to detail the objectives for meeting the sediment cleanup levels. What methods will be used for sampling? How many samples, QA/QC procedures, etc are not defined. What level of lead removal is needed to achieve protection of aquatic benthic organisms and birds? This was not identified in the proposal.

6. **Products.** Are products of value likely from the project? Specifically for restoration projects, are products of value also likely from the monitoring component? Are interpretative outcomes likely from the project?

Not clear.

7. **Capabilities.** What is the track record of applicants in terms of past projects? Is the project team qualified to efficiently and effectively implement the proposed project? Do they have available the infrastructure and other aspects of support necessary to accomplish the project?

The proposal lacked clear documentation on capabilities of the team.

8. **Cost/Benefit Comments.** Is the budget reasonable and adequate for the work proposed?

A very costly project that lacks proper feasibility and performance measures.

Miscellaneous comments:

External Scientific: #2

Research and Restoration External Scientific Review Form

Proposal Number: 133

Applicant Organization: San Francisco Public Utilities Commission

Proposal Title: Peninsula Sportsmen's Club, Salt Pond Remediation

Conflict of Interest Statements:

I have no financial interest in this proposal.

XCorrect

-Incorrect

In the blank below please explain any connection to proposal, to applicant, co-applicant or subcontractor or to submitting institution (write "none" if no connection):

None

Review:

Please provide an overall evaluation summary rating:

Excellent: outstanding in all respects;

Good: quality but some deficiencies;

Poor: serious deficiencies.

Overall Evaluation Summary Rating	Provide a brief explanation of your summary rating
XExcellent	The proposal present a clear plan for the clean up of an important environmental contaminant. There is substantial cost sharing. A succesful clean up should greatly improve the habitat quality in the San Francisco Bay area.
-Good	
-Poor	

1. **Goals.** Are the goals, objectives and hypotheses clearly stated and internally consistent? Is the concept timely and important?

The goal of the project is to perform remediation of the bird shot and clay pigeon debrie from the former Peninsula Sportsmans Club. This is a remediation proposal with a very structured plan, timeline, and clearly set water quality goals.

2. **Justification.** Is the study justified relative to existing knowledge? Is a conceptual model clearly stated in the proposal and does it explain the underlying basis for the proposed work? Is the selection of research, pilot or demonstration project, or a full-scale implementation project justified?

Lead shot has been clearly demonstrated to be a toxicological hazard to a variety of waterfowl. Lead is a critical environmental contaminant in sediment. Lead has been shown to be toxic to a variety of invertebrates and fish. Removal of the material should clearly improve the water quality in the area. The proposal documents the lead concentration with acceptable methods, and the removal of the lead impacted soils and sediments will be transported to a suitable Nevada site.

3. **Approach.** Is the approach well designed and appropriate for meeting the objectives of the project? Are results likely to add to the base of knowledge? Is the project likely to generate novel information, methodology or approaches? Will the information ultimately be useful to decision-makers?

The approach is well designed for this type of program. This is a remediation project, not a research program, but the successful treatment of the area should lead to a knowledge base applicable to other contaminated sites. Lead shot contaminated areas are widespread along the west coast, into Oregon and Washington, and are also known in British Columbia.

4. **Feasibility.** Is the approach fully documented and technically feasible? What is the likelihood of success? Is the scale of the project consistent with the objectives?

The remediation approach is clearly feasible for this site with a probability of success near 1.0. The major issue is the salt brine pond, but that should not provide an engineering roadblock.

5. **Project-Specific Performance Measures.** Does the project include appropriate performance measures to measure success relative to the project's goals and objectives? Is there enough detail as to how the performance measures will be quantified? For restoration projects, are monitoring plans explicit and detailed enough to determine if performance measures will be adequately assessed?

The program includes the appropriate analytical procedures to measure the success of the clean up program. The clean up will be documented by film and written reports.

6. **Products.** Are products of value likely from the project? Specifically for restoration projects, are products of value also likely from the monitoring component? Are interpretative outcomes likely from the project?

Improved water quality and a technical demonstration of the clean up process are the products of this program.

7. **Capabilities.** What is the track record of applicants in terms of past projects? Is the project team qualified to efficiently and effectively implement the proposed project? Do they have available the infrastructure and other aspects of support necessary to accomplish the project?

The team members are well qualified for this project. There is a great deal of expertise provided by the City of San Francisco in accomplishing previous clean ups of contaminated areas.

8. **Cost/Benefit Comments.** Is the budget reasonable and adequate for the work proposed?

The budget is typical of these kinds of efforts. The San Francisco is matching a considerable part of the overall budget, \$9.7 M of the \$14.6 M total.

Miscellaneous comments:

Lead contamination continues to pose a major risk to wildlife, especially birds and waterfowl. Water and sediment quality are also degraded by the contamination of soils and sediments. Clean-up and proper disposal of the areas outlined in this study should improve this important coastal habitat.

External Scientific: #3

Research and Restoration External Scientific Review Form

Proposal Number: 133

Applicant Organization: San Francisco Public Utilities Commission

Proposal Title: Peninsula Sportsmen's Club, Salt Pond Remediation

Conflict of Interest Statements:

I have no financial interest in this proposal.

XCorrect

-Incorrect

In the blank below please explain any connection to proposal, to applicant, co-applicant or subcontractor or to submitting institution (write "none" if no connection):

none

Review:

Please provide an overall evaluation summary rating:

Excellent: outstanding in all respects;

Good: quality but some deficiencies;

Poor: serious deficiencies.

Overall Evaluation Summary Rating	Provide a brief explanation of your summary rating
-Excellent	I feel like the applicants just did not give enough supporting information to justify the expenditure of such a large sum on this 29 acre restoration project. More details are needed as to why this site is so critical to the ecosystem as well as more details on how it will be done and monitored.
-Good	
XPoor	

1. **Goals.** Are the goals, objectives and hypotheses clearly stated and internally consistent? Is the concept timely and important?

This project requests funds to remove Pb-contaminated soil (60,000 cubic yards) from a former sportsmen's club. The lead contamination is from lead shot resulting from a skeet shooting range. Prior to the 1920s the site was primarily tidal wetlands. A levee was constructed in 1955 to separate the area from the bay. Much of the area was filled by 1969. There are some seasonal wetlands and a salt pond, the latter of which is 13 acres.

They cite Fig. 1-3 but that figure was not in my copy of the proposal. Some maps and photographs of the affected site would have been nice. They don't say how deep the pond is.

2. **Justification.** Is the study justified relative to existing knowledge? Is a conceptual model clearly stated in the proposal and does it explain the underlying basis for the proposed work? Is the selection of research, pilot or demonstration project, or a full-scale implementation project justified?

I don't feel that the justification presented in the proposal contains enough information supporting the fact that this site is truly critical to the tidal ecosystem. Perhaps it should just be capped and abandoned.

3. **Approach.** Is the approach well designed and appropriate for meeting the objectives of the project? Are results likely to add to the base of knowledge? Is the project likely to generate novel information, methodology or approaches? Will the information ultimately be useful to decision-makers?

After removing the contaminated soil they will bring in clean fill. They don't give an estimate of how much fill will be needed. They say they will separate the lead shot for recycling. I wonder if this is cost-effective. How do they do this? Are the "clean soils" those that have been treated with phosphate? I didn't understand the separation process of "clean" vs other soils. More details are needed here.

They mention a couple dredging alternatives, but they never mentioned the idea of filling the pond and capping the whole area with a clay layer and then covering this with clean soil and planting it. This would lose the area to tidal marsh but in light of the \$14.6 million price tag it may be that this should be considered and put the money into restoring other areas that don't have the big contamination problems. The contaminated soil is just going to be hauled off and stored somewhere else.

4. **Feasibility.** Is the approach fully documented and technically feasible? What is the likelihood of success? Is the scale of the project consistent with the objectives?

I'd feel more comfortable about the possible success if they had cited some papers published about other sites where similar tasks were undertaken, or had at least discussed a few similar projects in some detail and the success or failure of such projects.

5. **Project-Specific Performance Measures.** Does the project include appropriate performance measures to measure success relative to the project's goals and objectives? Is there enough detail as to how the performance measures will be quantified? For restoration projects, are monitoring plans explicit and detailed enough to determine if performance measures will be adequately assessed?

Very little detail is given regarding performance measures and no detail at all is given about the water quality, sediment testing, or benthic fauna sampling. Approximately how many samples will be collected? When? Where? Etc.

6. **Products.** Are products of value likely from the project? Specifically for restoration projects, are products of value also likely from the monitoring component? Are interpretative outcomes likely from the project?

The only product they list is improved water quality. As I mentioned above, it would be nice to know if similar projects resulted in significantly improved water quality. The monitoring component is not detailed whatsoever, e.g. they say "evaluation of benthic infauna will be performed, if possible".

7. **Capabilities.** What is the track record of applicants in terms of past projects? Is the project team qualified to efficiently and effectively implement the proposed project? Do they have available the infrastructure and other aspects of support necessary to accomplish the project?

I didn't see where they listed the qualifications of the people conducting the work. Maybe for some reason I couldn't download all of the proposal, because I seem to be missing some figures too.

8. **Cost/Benefit Comments.** Is the budget reasonable and adequate for the work proposed?

I guess they are requesting \$5 million from CalFed, but the total project is \$14.6 million. I was a little confused about where the money above the \$5 million is all coming from. I don't really have the expertise to judge the costs of excavation and truck and train removal of the soil. I was surprised they needed three full-time people (1 manager and 2 engineers) in addition to all the consulting services. Can't the engineers do the plans and specs for the project? And can't the project manager handle some of the \$300,000 in construction management duties?

Miscellaneous comments:

Environmental Compliance:

Proposal Number: 133

Applicant Organization: San Francisco Public Utilities Commission

Proposal Title: Peninsula Sportsmen's Club, Salt Pond Remediation

1. Are the legal or regulatory issues that affect the proposal identified adequately in the proposal?

Yes -No

If no, please explain:

State Lands Commission Land Use Lease may be necessary.

May also need Reclamation Board Encroachment Permit if levees are part of a flood control program.

Land use change may require rezone or conditional use permit.

2. Does the project's timeline and budget reflect adequate planning to address legal and regulatory issues that affect the proposal?

Yes -No

If no, please explain:

Budget for permits and environmental documents not specifically listed.

More time may be necessary for adoption of CEQA documents. A negative declaration must be adopted within 180 days after application is complete.

3. Do the legal and regulatory issues that affect the proposal significantly impair the project's feasibility?

-Yes No

If yes, please explain:

Most required permits will be obtained but should look into getting the above mentioned permits.

Other Comments:

Budget:

Proposal Number: 133

Applicant Organization: San Francisco Public Utilities Commission

Proposal Title: Peninsula Sportsmen's Club, Salt Pond Remediation

1. Does the proposal include a detailed budget for each year of requested support?

Yes -No

If no, please explain:

2. Does the proposal include a detailed budget for each task identified?

Yes -No

If no, please explain:

3. Does the proposal clearly state the type of expenses encompassed in indirect rates or overhead costs?

Yes -No

If no, please explain:

4. Are appropriate project management costs clearly identified?

Yes -No

If no, please explain:

5. Do the total funds requested (Form I, Question 17A) equal the combined total annual costs in the budget summary?

Yes No

If no, please explain (for example, are costs to be reimbursed by cost share funds included in the budget summary).

17a is \$5,000,000 and identifies partner, SF PUC, \$920,000 approx. Budget Summary is \$14,617,570.78. Page 12 of proposal identifies matching cost share of \$9,617,570.78 from the SF PUC capital improvement projects budget.

6. Does the budget justification adequately explain major expenses?

Yes -No

If no, please explain:

7. Are there other budget issues that warrant consideration?

-Yes No

If yes, please explain:

Other Comments:

page 14 of the proposal identifies tasks but does not identify costs and time frames for each task.