



**HEARING STATEMENT TO BOARD OF SUPERVISORS**  
**HUNTERS POINT NAVAL SHIPYARD**  
**15 September 2022**

Thank you for the opportunity to provide this statement to the Board of Supervisors' Government Audit and Oversight Committee regarding the June 2022 report from the Civil Grand Jury (CGJ). The Navy takes a comprehensive approach to cleanup at the former Hunters Point Naval Shipyard (HPNS) to ensure the health and safety of the community – now and into the future.

Our responsibility is to complete work in a way that ensures long-term public health and safety before any parcel is transferred to the City of San Francisco. That's why the Navy remains methodical in its cleanup approach, which is based on the best available data, science and engineering. Our sampling and testing requirements are vetted through rigorous work plans that have been prepared by Navy cleanup experts, and reviewed and concurred with by the regulatory agencies and the City of San Francisco. Once work has been performed, reports documenting completion are vetted following the same rigorous review process by the Navy and regulatory agencies that our work plans undergo. Our work plans and reports are available to the public through the Administrative Record website.

The June 2022 CGI Report makes many claims about the Navy's environmental program at HPNS and concludes that the program does not adequately account for future Sea Level Rise. We disagree with the report's conclusion. The Navy has not only accounted for current and future sea level rise at HPNS, but there are measures and monitoring requirements in place at the Shipyard that demonstrate this fact. For example, the Remedial Action underway at Parcel E-2 includes an engineered shoreline designed to address 100-year sea level rise projections. These efforts are consistent with the Navy's goal to protect public health over the long term – even after property is transferred to the City of San Francisco.

With respect to regular, ongoing monitoring, the Navy is required to evaluate the protectiveness of the remedies in place at HPNS every five years, indefinitely. Under the Five Year Review process, the Navy, federal and state regulatory agencies and the City of San Francisco re-evaluate the protectiveness of the remedies currently in place as required by the Comprehensive Environmental Response, Compensation, and Liability Act (or CERCLA) to ensure that public health is protected.

The following provides the Committee some specifics about the Navy's work to account for the effects of climate change:

- Sea level rise is evaluated and accounted for in design documents that are reviewed by federal, state and local regulatory agencies as part of the CERCLA regulatory process. The Navy's response actions are dependent on site-specific conditions.



- The Navy has monitored groundwater elevation changes due to tidal influences and seasonal variations under the Navy's basewide groundwater monitoring program at HPNS for over two decades. Several years ago, the Navy's groundwater monitoring program was enhanced to provide groundwater data to evaluate groundwater level rise over time. This groundwater data will be used to evaluate the site and ensure it remains safe. The Navy will make adjustments to the remedies in place as needed throughout time so they remain protective.
- Measures the Navy uses to counter sea level rise at HPNS include: (a) below and above-ground walls that prevent water and soil movement to limit erosion, (b) increasing the shoreline elevation, (c) excavation and removal of contaminated soils, (d) groundwater treatment, and (e) long-term monitoring/maintenance to ensure that treatment technologies remain effective.
- The Parcel E-2 landfill remedy under construction at the Shipyard is an example of how the Navy has factored sea level rise into the HPNS cleanup. The Navy's remedy includes armoring the shoreline with large boulders and building a 3-foot-high concrete seawall to provide erosion protection to a combined 12' above the mean sea level. Parcel E-2 will be inspected at least yearly, and any required maintenance will be identified and addressed.
- At Parcel E, the Navy is addressing soil contamination through "in-situ stabilization", a method specifically designed to prevent contaminants moving from soil into groundwater, regardless of groundwater elevation.
- The next Five Year Review for HPNS will be completed in 2023, and will include an evaluation of the potential effects of sea level rise and associated groundwater elevation changes on the remedies currently in place. The 2023 Five Year Review will be available on our website in Spring/Summer of 2023. The Navy will also present relevant SLR information to the HPNS community during our monthly community outreach activities as information becomes available.
- In March 2022, Navy experts at the Naval Facilities Engineering and Expeditionary Warfare Center (NAVFAC EXWC), who specialize in groundwater and surface water modeling and who evaluate the effects of sea level rise on CERCLA sites across the Department of Navy, began a review of the remedial actions at HPNS. NAVFAC EXWC will support and inform the upcoming HPNS Five Year Review, which will be coordinated with regulatory agencies, the City of San Francisco, and other stakeholders at HPNS.
- We will continue working together with the U.S. Environmental Protection Agency, the California Department of Toxic Substances Control (DTSC) and the Water Board to assess sea level rise impacts to remedies that are in place to ensure they remain protective of human health and the environment.



The Navy maintains a close working relationship with the City, regulatory agencies, and other stakeholders on the HPNS cleanup program, and bases its decisions on sound science. This represents our collective commitment now and in the future to ensure necessary actions are taken to protect the public and environment from the potential impacts of climate change, namely sea level rise. We encourage the public to view our website at [www.bracpmo.navy.mil/hpns](http://www.bracpmo.navy.mil/hpns) where we announce opportunities to meet with the Navy and to learn more about the environmental cleanup program at Hunters Point.

Should the Committee have any questions about HPNS, please contact the Navy's HPNS Environmental Coordinator, Derek Robinson at [derek.j.robinson1@navy.mil](mailto:derek.j.robinson1@navy.mil).