



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

June 14, 2000

Attn: Mr. Dean Gould
BRAC Environmental Coordinator
MCAS El Toro
P.O. Box 51718
Irvine, CA 92619-1718

Re: EPA Comments On Federal Agency-To-Agency Property Transfer, Environmental Summary Document, For Certain Property, Marine Corps Air Station El Toro, CA

Dear Mr. Gould:

Thank you for the opportunity to review the federal agency-to-agency property transfer environmental summary document for certain property at Marine Corps Air Station El Toro, Ca. The United States Environmental Protection Agency (EPA) has reviewed this document and offers the following comments:

General Comments

- 1) The document was somewhat confusing to read, therefore, EPA recommends that the document be revised to eliminate several inconsistencies and to clarify which areas will be transferred and to whom.
- 2) In order to better locate areas, all locations referenced in the text e.g., APHO 44, USTs, pistol range, etc., should be shown on the map referenced as Attachment 2.
- 3) What is being done with Site 1? It is not mentioned in the text yet it is shown on Attachment (2) as being transferred to the Federal Bureau of Investigation. Is Site 1 part of this transfer? If so, then it should part of the text.
- 4) The boundaries of the parcel to be transferred should be described in the text.

Specific Comments

- 1) pgs. 4 & 13 - the Area types in the Statement of Findings and the Area type 1 exceptions described on page 4 do not entirely match, i.e., there is no mention of the pistol range on page 4 and there is no mention of UST areas, APHO 44 and OWS Site 806 on page 13.

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2) Attachment 3 - the first paragraph mentions habitat for the California least tern in the acreage proposed for transfer, yet the main text of the document mentions the California gnat catcher habitat in the landfill areas. Are both species present in the parcel? This should be clarified in both documents as well as the status of the birds - federally protected? If the least tern is present at the landfills, will there also be some mitigation for their habitat?

3) Attachment 3 - the text states 901 acres of real property will be transferred while Attachment 4 map shows 991 acres. Please clarify why there is a difference in the 2 numbers.

Again, thank you for the opportunity to comment. Please feel free to contact me if you have any questions.

Sincerely,



Glenn Kistner
Remedial Project Manager
Federal Facilities Cleanup Branch

cc: Triss Chesney, DTSC
John Hamill, EPA
Patricia Hannon, RWQCB
Gregory Hurley, RAB Co-Chair
Polin Modanlou, LRA