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MCAS EL TORO
SSIC #5090.3



County of Orange
California

Gary Simon
Executive Director

MCAS El Toro
Local Redevelopment
Authority

February 26, 2001

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

Subject: Final Radiological Survey Plan

Dear Mr. Gould:

In November of last year, the Department of Navy / United States Marine Corps ("DON/USMC") issued a Draft Final Radiological Survey Plan ("Draft Final Survey Plan") for the former Marine Corps Air Station ("MCAS") El Toro. As with an earlier draft issued in July 2000, the Draft Final Survey Plan outlined the proposed radiological investigation for various buildings and sites at MCAS El Toro, which were selected based on the Final Historical Radiological Assessment (HRA) completed in May 2000.

On December 15, 2000, the MCAS El Toro Local Redevelopment Authority ("LRA") transmitted to DON/USMC a written memorandum prepared by the LRA's technical consultant in which a number of issues and concerns regarding the Draft Final Survey Plan were raised. In particular, the memorandum noted that many of the LRA's prior comments on the July 2000 draft had not been fully addressed.

In January of this year, DON/USMC issued its Final Radiological Survey Plan for MCAS El Toro ("Final Survey Plan"), as well as its response to comments submitted by the LRA and others on the Draft Final Survey Plan. While DON/USMC's response to comments are fairly detailed, they nonetheless fail to address all of the issues and concerns raised by the LRA. In several instances, DON/USMC dismisses these issues and concerns and defends its proposed strategy and approach for conducting the radiological survey at MCAS El Toro. In other instances, DON/USMC asserts the issues and

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concerns raised by the LRA will be addressed when the radiological survey is conducted and any required remediation measures are implemented.

Given this, the LRA does not believe that submitting further comments on the Final Survey Plan would be productive or appropriate at the time. Rather, the LRA will wait until radiological survey has been implemented and the results are obtained. To that end, the LRA hereby requests that it be provided with copies of any and all future documents and data generated by DON/USMC in conjunction with its radiological survey at MCAS El Toro.

Having said this, the LRA wants to emphasize that all potential risks to human health and the environment that may be posed by radiological materials at MCAS El Toro must be identified and addressed by DON/USMC. Furthermore, if the results of the radiological survey indicate that there were flaws in the assumptions made or protocols proposed in the Final Survey Plan, then it will be DON/USMC's responsibility to correct such problems and re-survey the property.

Thank you for the opportunity to review the Draft Final Survey Plan. We look forward to receiving the results of the radiological survey for MCAS El Toro. If you have any questions, please do not hesitate to call Polin Modanlou of my staff at (714) 834-3156.

Sincerely,



Gary Simon, Executive Director
MCAS El Toro Redevelopment Authority

cc: Members, Board of Supervisors
Michael Schumacher, Ph.D., CEO
Nicole Moutoux, US EPA
Triss Chesney, DTSC
John Broderick, CRWQCB
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