



City of Irvine, California

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MCAS EL TORO
SSIC # 5090.3

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SEP 12 1995

September 12, 1995

Mr. Joseph Joyce
Environmental Projects Manager
Southwest Division Naval Facilities
Engineering Command (SWDIV)
1220 Pacific Highway
San Diego, CA 92132-1581

Subject: EE/CAS for Sites 4, 7, 11, 13, 14, 19 and 20

Dear Mr. *Joseph* Joyce:

The City of Irvine staff would like to express its concern with the comments discussed at the Restoration Advisory Board (RAB) meeting of August 31, 1995, regarding the draft Engineering Evaluation and Cost Analyses (EE/CAS) for sites 4, 7, 11, 13, 14, 19 and 20, located at MCAS El Toro.

As noted in Ms. Bonnie Arthur's presentation to the RAB, the proposed clean-up for the above noted remediation sites will only be performed to "industrial" standards. Furthermore, it was indicated that additional clean-up efforts would be contingent upon the land uses identified in the approved Record of Decision (ROD).

Based on this approach, we believe that once the sites have been cleaned-up to industrial standards additional funds may not be budgeted and/or be available for additional clean-up efforts. Potentially, this approach could result in numerous inconsistencies between clean-up levels for portions of the base and land uses contained in the ROD resulting in significant delays in implementation of the ROD until such time additional clean-up funds could be secured and remediation could be completed. This point is especially important considering the diverging range of opinions currently expressed by the impacted communities regarding the reuse of MCAS El Toro.

Therefore, we believe that the draft EE/CAS for the subject sites should be revised to indicate a commitment that federal clean-up will be to pre-MCAS El Toro development levels, unless the Record of Decision dictates otherwise (that a lower than pre-development clean-up standard is acceptable based on the uses anticipated). We respectfully request that this important issue be placed on the next RAB meeting agenda for discussion scheduled for September 28, 1995.

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If you have any questions, please feel free to contact Mr. Daniel Jung,
Senior Planner, at (714) 724-6424.

Sincerely,



PETER HERSH
Manager of Land Use and Policy Programs

c: Marcia Rudolph, RAB Community Chair
Paul Brady, Jr., City Manager
Robert C. Johnson, Director of Community Development
Colonel Jim Ritchie, BRAC Office