



BECHTEL NATIONAL INC.

M600501001950  
MCAS EL TORO  
SSIC # 5090.3

**CLEAN II TRANSMITTAL/DELIVERABLE RECEIPT**

Contract No. N-68711-92-D-4670

Document Control No.: CTO-0103/0143

File Code: 0222

TO: Commanding Officer  
Naval Facilities Engineering Command  
Southwest Division  
Mr. Richard Selby, Code 57CS.RS (O)  
Building 128  
1220 Pacific Highway  
San Diego, CA. 92132-5187

DATE: February 21, 1997

CTO #: 0103

LOCATION: MCAS El Toro

FROM:

C. L. Carlisle, Project Manager

DESCRIPTION: Response to Comments Draft BRAC Cleanup Plan  
DTD January 1997

TYPE:  Contract Deliverable (Cost)  CTO Deliverable (Technical)  Other

VERSION: Final REVISION #: 0

ADMIN RECORD: Yes  No  Category  Confidential   
(PM to Identify)

SCHEDULED DELIVERY DATE: 02/21/97 ACTUAL DELIVERY DATE: 02/21/97

NUMBER OF COPIES SUBMITTED: 10/4C/4E

COPIES TO (Include Name, Navy Mail Code, and No. of Copies):

**SWDIV:**

- J. Rogers, Code 5723.JR (1C/1E)\*
- B. Lindsey, Code 56MC.BL (1C/1E)
- V. Garelick, Code 5722.VG (1C/1E)
- A. Piszkin, Code 56MC.AP (1C/1E)
- 
- 
- 
- 
- 

**BECHTEL** (Distributed by Bechtel):

- J. Kluesener (1C)
- C. Carlisle (1C/1E)
- D. Hallerbach (1C/1E)
- B. Coleman (2E for AR, 1E for IR)
- El Toro File (1C/1E)
- BNI Document Control (1C/1E)
- 
- 
- 

**OTHER** (Distributed by Bechtel):

- J. Joyce, El Toro (1C/1E)
- G. Kistner, US EPA (1C/1E)
- T. Mahmoud, Cal EPA (1C/1E)
- T. Mathews, Orange Co. (1C/1E)
- 
- 
- 
- 

O = Original Transmittal Sheet  
C = Copy Transmittal Sheet  
E = Enclosure  
\* = Unbound

Date/Time Received

# Bechtel

401 West A Street  
Suite 1000  
San Diego, CA 92101-7905

CLEAN II Program  
Bechtel Job No. 22214  
Contract No. N68711-92-D-4670  
File Code: 0222  
**IN REPLY REFERENCE:** CTO-0103/0143

February 21, 1997

Commanding Officer  
Naval Facilities Engineering Command  
Southwest Division  
Mr. Richard Selby, Code 57CS.RS  
Building 128  
1220 Pacific Highway  
San Diego, CA 92132-5187

Subject: Response to Comments Draft BRAC Cleanup Plan  
Marine Corps Air Station, El Toro

Dear Mr. Selby:

Enclosed are response to comments on the 1997 Draft Base Realignment and Closure (BRAC) Cleanup Plan (BCP).

Formal responses to comments on the Draft BCP are provided for Cal-EPA and County of Orange, Local Redevelopment Authority, comments only. No U.S. EPA comments were received. The final BCP serves as the comment resolution document for all other comments on the Draft BCP received from SWDIV and Station staff.

If you have any questions, please do not hesitate to contact Dimitri Hallerbach at (619) 687-8855 or me at (619) 687-8804.

Very truly yours,



Craig L. Carlisle  
Project Manager

CLC/sp

Enclosure: Response to Comments Draft BRAC Cleanup Plan



**Bechtel National, Inc.** Systems Engineers-Constructors

**RESPONSE TO COMMENTS  
DRAFT BRAC CLEANUP PLAN  
MCAS EL TORO, CALIFORNIA**

<p><b>Originator:</b> Tayseer Mahmoud DTSC</p> <p><b>To:</b> Joseph Joyce, BRAC Environmental Coordinator MCAS El Toro</p> <p><b>Date:</b> 23 January 1997</p>	<p><b>CLEAN II Program</b> Contract No. N68-711-92-D-4670 CTO-0103/0143 File Code: 0222</p>
<p><b><u>SPECIFIC COMMENTS</u></b></p> <p><b>COMMENT 1:</b> <u>Chapter 1, Figure 1-2, Location of Past Hazardous Substance Activities</u> - Please verify whether legend item number 7 should be "FIRE" instead of "FIVE."</p>	<p><b><u>RESPONSES TO SPECIFIC COMMENTS</u></b></p> <p><b>RESPONSE 1:</b> "Fire" is correct. Comment incorporated.</p>
<p><b>COMMENT 2:</b> <u>Chapter 3, Page 3-6 and 3-7, bullet Items on OU-3</u> - The text states that portions of Sites 15, 19, and 20 were withdrawn from the IR Program via the CERCLA petroleum exclusion. It is not clear whether the Navy will track the status of these sites in the BCP. We strongly recommend that the BCP continue to update the status of these sites so that the BCT will have an overall picture of the remedial activities and schedules.</p>	<p><b>RESPONSE 2:</b> Sites that are removed from the Installation Restoration Program through the CERCLA petroleum exclusion are placed in the appropriate compliance programs. The BCP will continue to update the status of these sites, as will the appropriate RI and FS reports, proposed plans and records of decision.</p>
<p><b>COMMENT 3:</b> <u>Chapter 3, Page 3-26, Section 3.2.11 Lead-Based Paint</u> - The U.S. Environmental Protection Agency, Office of General Counsel issued a memorandum which discusses soil contamination with lead from paint chips flaking or sandblasted off residential and other structures (copy attached). They have determined that this constitutes a CERCLA release. The U.S. EPA has also commented on draft FOSTs, that they would not agree that the military could provide the CERCLA Section 120(h)(3) covenant that "all remedial actions have been taken," if no investigation for lead contamination was conducted around structures. We recommend that the BCT discuss the memorandum and decide how to incorporate this information and schedule for investigation in the BCP. Sections 3.2.11 may require revisions.</p>	<p><b>RESPONSE 3:</b> Department of the Navy and U.S. EPA policies do not currently address this type of release. Because the BCP is a "living" document, immediate resolution of this issue is not a requirement for the issuance of the final BCP. However, at the 30 January 1997 BCT meeting, the BCT agreed that they would address this issue in the future if there were any change in policy.</p>

**RESPONSE TO COMMENTS  
DRAFT BRAC CLEANUP PLAN  
MCAS EL TORO, CALIFORNIA**

<p><b>Originator:</b> Thomas B. Mathews County of Orange</p> <p><b>To:</b> Joseph Joyce, BRAC Environmental Coordinator MCAS El Toro</p> <p><b>Date:</b> 24 January 1997</p>	<p style="text-align: right;">CLEAN II Program Contract No. N68-711-92-D-4670 CTO-0103/0143 File Code: 0222</p>
<p><b><u>COMMENTS</u></b></p> <p><b>COMMENT 1: <u>Executive Summary</u></b> - Revise the section titled "Status of Disposal, Reuse and Interim Lease Process" beginning on page ES-1 as follows:</p> <p>In March 1994, the County of Orange (County), along with the Cities of Irvine and Lake Forest, formed a joint powers authority to develop a reuse plan for MCAS El Toro. In January 1995, the County withdraw from the joint powers authority in response to the passage of Measure A, a countywide ballot initiative approved by Orange County voters in November 1994. Measure A anticipates that the principal feature of a County-adopted reuse plan for MCAS El Toro should be a commercial airport serving a substantial portion of the County's demand for commercial passenger and air cargo service. Measure A also established the 13-member El Toro Airport Citizens Advisory Commission (CAC) to advise the Board of Supervisors and Orange County Planning Commission on base reuse.</p> <p>In April 1995, the Office of Economic Adjustment formally recognized the Orange County Board of Supervisors as the official Local Redevelopment Authority (IRA) for MCAS El Toro. As the recognized IRA, the Board of Supervisors was given sole responsibility for preparing a Community Reuse Plan (CRP) for submittal to the DON.</p> <p>The following DoD and federal agencies submitted formal applications for MCAS El Toro property during the federal screening process conducted by the Military Department:</p> <ul style="list-style-type: none"> <li>• Defense Commissary Agency</li> <li>• Department of the Air Force/California Air National Guard</li> <li>• Department of the Army/Army Reserve Command</li> </ul>	<p><b><u>RESPONSES TO COMMENTS</u></b></p> <p><b>RESPONSE 1:</b> Due to the summary nature of this document, not all of the recommended text was included. The following text appears in the executive summary:</p> <p>In March 1994, the County of Orange (County), along with the Cities of Irvine and Lake Forest, formed a joint powers authority to develop a reuse plan for MCAS El Toro. In January 1995, the County withdraw from the joint powers authority in response to the passage of Measure A, a countywide ballot initiative approved by Orange County voters in November 1994. Measure A anticipates that the principal feature of a County-adopted reuse plan for MCAS El Toro should be a commercial airport. Measure A also established the 13-member El Toro Airport Citizens Advisory Commission to advise the Board of Supervisors and Orange County Planning Commission on base reuse.</p> <p>In April 1995, the Office of Economic Adjustment formally recognized the Orange County Board of Supervisors as the official Local Redevelopment Authority (LRA) for MCAS El Toro. As the recognized LRA, the Board of Supervisors was given sole responsibility for preparing a Community Reuse Plan (CRP) for submittal to the Department of the Navy (DON). Eight Department of Defense (DoD) and federal agencies submitted formal applications for MCAS El Toro property during the federal screening process conducted by the Military Department. They are listed in Chapter 2.</p> <p>The LRA provided its recommendations on each of these requests to the Assistant Secretary of the Navy in early 1995. The LRA has endorsed requests by the Department of Interior for the Habitat Reserve, the Federal Aviation Administration, and the California Air National Guard. The LRA recommended that the remaining requests be denied. No surplus property determination has been made, and none of the transfer</p>

**RESPONSE TO COMMENTS  
DRAFT BRAC CLEANUP PLAN  
MCAS EL TORO, CALIFORNIA**

<p><b>Originator:</b> Thomas B. Mathews County of Orange</p> <p><b>To:</b> Joseph Joyce, BRAC Environmental Coordinator MCAS El Toro</p> <p><b>Date:</b> 24 January 1997</p>	<p style="text-align: right;"><b>CLEAN II Program</b> Contract No. N68-711-92-D-4670 CTO-0103/0143 File Code: 0222</p>
<ul style="list-style-type: none"> <li>• Department of Interior - Habitat Reserve</li> <li>• Department of Interior - Land Exchange</li> <li>• Department of Justice/Federal Bureau of Prisons</li> <li>• Federal Aviation Administration</li> <li>• Immigration and Naturalization Service</li> </ul> <p>The LRA provided its recommendations on each of these requests to the Assistant Secretary of the Navy in early 1995. The Department of Interior Land Exchange request and the request by the Federal Bureau of Prisons were withdrawn by the applicants. The LRA has endorsed requests by the Department of Interior for the Habitat Reserve, the Federal Aviation Administration and the California Air National Guard. The LRA recommended that the remaining requests be denied. No surplus property determination has been made, and none of the transfer actions has been approved by the Assistant Secretary of the Navy as of 15 January 1997.</p> <p>In the Fall of 1995, the LRA conducted the state/local and homeless provider screening process in accordance with the Base Closure Community Redevelopment and Homeless Assistance Act of 1994 and implementing regulations issued by the DoD and the U.S. Department of Housing and Urban Development (HUD) in August 1995.</p> <p>The LRA prepared a Draft CRP and Draft EIR which evaluated three alternatives at a comparable level of detail. The LRA conducted an analysis of these three alternatives and provided extensive opportunities for public participation and input. Reuse Alternative A - Commercial Passenger/Cargo Use (the proposed project) - provided for a full service commercial passenger and cargo airport and compatible nonaviation uses. Reuse Alternative B - Cargo/General Aviation Use - provided for a cargo and general aviation airport and compatible non-aviation uses. Reuse Alternative C - Nonaviation - provided for nonaviation uses including an educational campus, visitor oriented attractions, research and development and other uses.</p>	<p>actions has been approved by the Assistant Secretary of the Navy as of 15 January 1997.</p> <p>In the fall of 1995, the LRA conducted the state/local and homeless provider screening process in accordance with the Base Closure Community Redevelopment and Homeless Assistance Act of 1994 and implementing regulations issued by the DoD and the U.S. Department of Housing and Urban Development (HUD) in August 1995.</p> <p>The LRA prepared a final CRP and draft Environmental Impact Report (EIR) which evaluated three reuse alternatives for the Station. Reuse Alternative A—Commercial Passenger/Cargo Use (the proposed project)—provided for a full service commercial passenger and cargo airport and compatible nonaviation uses. Reuse Alternative B—Cargo/General Aviation Use—provided for a cargo and general aviation airport and compatible non-aviation uses. Reuse Alternative C—Nonaviation—provided for nonaviation uses including an educational campus, visitor-oriented attractions, research and development, and other uses.</p> <p>In August 1996, the LRA issued the draft MCAS El Toro CRP, Homeless Assistance Submission (HAS) and draft EIR for a 67-day public review and comment period. The written public comment period ended on 15 October 1996. In the fall of 1996, the Orange County Airport Commission, the El Toro Airport Citizens Advisory Commission, and the Orange County Planning Commission conducted public meetings/hearings and adopted recommendations to the Board of Supervisors on the draft CRP, HAS and EIR.</p> <p>On 11 December 1996, the Board of Supervisors adopted the final MCAS El Toro CRP (P&amp;D Consultants Team, December 1996), which provides for more detailed study of a full-service commercial passenger and cargo airport, as well as compatible nonaviation uses.</p> <p>The final CRP also incorporates the LRA's previously transmitted</p>

**RESPONSE TO COMMENTS  
DRAFT BRAC CLEANUP PLAN  
MCAS EL TORO, CALIFORNIA**

<p><b>Originator:</b> Thomas B. Mathews County of Orange</p> <p><b>To:</b> Joseph Joyce, BRAC Environmental Coordinator MCAS El Toro</p> <p><b>Date:</b> 24 January 1997</p>	<p style="text-align: right;"><b>CLEAN II Program</b> Contract No. N68-711-92-D-4670 CTO-0103/0143 File Code: 0222</p>
<p><b>In August 1996, the LRA issued the Draft MCAS El Toro CRP, Homeless Assistance Submission (HAS) and Draft EIR for a 67-day public review and comment period. The written public comment period ended on 15 October 1996. In the Fall of 1996, the Orange County Airport Commission, the El Toro Airport Citizens Advisory Commission and the Orange County Planning Commission conducted public meetings/hearings and adopted recommendations to the Board of Supervisors on the Draft CRP, HAS and EIR.</b></p> <p><b>On December 11, 1996 the Board of Supervisors adopted the Final MCAS El Toro CRP (P&amp;D Consultants, Inc., December 1996) which provides for more detailed study of a full-service commercial passenger and cargo airport, as well as compatible nonaviation uses. These non-aviation uses include: a 998-acre habitat reserve, an educational campus, research and development/light industrial, commercial/office, a multimodal transportation center, recreation, golf, public facility and institutional uses, and housing and various support services for the homeless.</b></p> <p><b>The Final CRP also incorporates the LRA's previously transmitted recommendations on each of the DoD and federal agency requests for property at the base and the 47 Notice of Interest applications submitted during the state/local and homeless provider screening process conducted by the LRA. The Final CRP and HAS were submitted to the Assistant Secretary of the Navy and the Secretary of HUD on 13 December 1996.</b></p> <p><b>Continue with the following three paragraphs on page ES-2 of Draft BCP:</b></p> <p><b>[Remainder of first paragraph beginning with:] "Through the final Environmental Baseline Survey (EBS) Report (Jacobs Engineering, 1995), and the preparation of the BCP, approximately 2,105 acres (66 percent)..."</b></p> <p><b>"Currently, the Bake Parkway..."</b></p> <p><b>"The County and DON have entered into agreements ...."</b></p>	<p><b>recommendations on each of the DoD and federal agency requests for property at the base and the 47 Notice of Interest applications submitted during the state/local and homeless provider screening process conducted by the LRA. The final CRP and HAS were submitted to the Assistant Secretary of the Navy and the Secretary of HUD on 13 December 1996.</b></p>

**RESPONSE TO COMMENTS  
DRAFT BRAC CLEANUP PLAN  
MCAS EL TORO, CALIFORNIA**

<p><b>Originator:</b> Thomas B. Mathews County of Orange</p> <p><b>To:</b> Joseph Joyce, BRAC Environmental Coordinator MCAS El Toro</p> <p><b>Date:</b> 24 January 1997</p>	<p style="text-align: right;"><b>CLEAN II Program</b> Contract No. N68-711-92-D-4670 CTO-0103/0143 File Code: 0222</p>
<p><b>COMMENT 2:</b> <u>Chapter 1 - Introduction</u> - Revise Table 1-1 to reflect for Thomas B. Mathews the "Title/Organization" as "County of Orange, Planning and Development Services Department" and the "Role/Responsibility" as "LRA Representative to the RAB." Please delete the reference to the Airport Citizens Advisory "Committee." The Orange County Board of Supervisors, not the El Toro Airport Citizens Advisory Commission, is the recognized LRA.</p>	<p><b>RESPONSE 2:</b> Comment incorporated.</p>
<p><b>COMMENT 3:</b> <u>Chapter 2 - Property Disposal and Reuse Plan</u> - Revise the second paragraph on Page 2-1 as follows: On 11 December 1996, the Orange County Board of Supervisors, as the officially recognized LRA for MCAS El Toro, adopted the Final MCAS El Toro Community Reuse Plan (CRP), approved the Final Homeless Assistance Submission (HAS), and certified Final Environmental Impact Report (EIR) No. 563 for the Reuse Plan (all prepared by P&amp;D Consultants, Inc., 1996). The Final CRP and Homeless Assistance Submission were submitted to the Assistant Secretary of the Navy and the U.S. Department of Housing and Urban Development (HUD) on 13 December 1996.</p>	<p><b>RESPONSE 3:</b> Comment incorporated</p>

**RESPONSE TO COMMENTS  
DRAFT BRAC CLEANUP PLAN  
MCAS EL TORO, CALIFORNIA**

<p><b>Originator:</b> Thomas B. Mathews County of Orange</p> <p><b>To:</b> Joseph Joyce, BRAC Environmental Coordinator MCAS El Toro</p> <p><b>Date:</b> 24 January 1997</p>	<p style="text-align: right;">CLEAN II Program Contract No. N68-711-92-D-4670 CTO-0103/0143 File Code: 0222</p>
<p><b>COMMENT 4: <u>Revise Section 2.1 - "Status of Disposal Planning Process" on page 2-1 as follows:</u></b> In March 1994, the county of Orange (County), along with the cities of Irvine and Lake Forest, formed a joint powers authority to develop a reuse plan for MCAS El Toro and undertook the first phase of this planning effort. In January 1995, the County withdrew from the joint powers authority in response to Measure A, a countywide ballot initiative approved by Orange County voters in November 1994. Measure A anticipates that the principal feature of a County-adopted reuse plan for MCAS El Toro should be a commercial airport serving a substantial portion of the County's demand for commercial passenger and air cargo service. Measure A also established the 13-member El Toro Airport Citizens Advisory Commission (CAC) to advise the Board of Supervisors and Orange County Planning Commission on base reuse.</p> <p>In April 1995, the office of Economic Adjustment formally recognized the Orange County Board of Supervisors as the official Local Redevelopment Authority (LRA) for MCAS El Toro. As the recognized LRA, the Board of Supervisors was given sole responsibility for preparing a Community Reuse Plan for submittal to the DON.</p> <p>Although invited and encouraged to participate in the LRA's reuse effort, a group of nine cities in southern Orange County remain opposed to the LRA's reuse planning structure, process and adopted CRP. These nine cities formed the El Toro Reuse Planning Authority (ETRPA) which is a joint powers authority created for the purpose of developing its own redevelopment plan for submittal to the DON. OEA has indicated to ETRPA in writing that it will accept a redevelopment plan only from the County which is the officially recognized LRA and which is intended as the single point of contact on all base reuse matters.</p> <p>On December 11, 1996 the Board of Supervisors adopted the Final MCAS El Toro CRP (P&amp;D Consultants, Inc., December 1996) which provides for further study of a full-service commercial passenger and cargo airport, as well as compatible nonaviation uses. These non-aviation uses include: a</p>	<p><b>RESPONSE 4:</b> Due to the summary nature of this document, not all of the recommended text was included. Some of the table and figures called out in the comments have been omitted. However, portions of the text omitted from the Executive Summary comments (Comment 1) are included in Chapter 2. The following text appears in Chapter 2:</p> <p>In March of 1994, the County of Orange (County), along with the cities of Irvine and Lake Forest formed a joint powers authority to develop a reuse plan for MCAS El Toro and undertook the first phase of this planning effort. On 31 January 1995, the County withdrew from the joint powers authority in response to Measure A, a countywide ballot initiative approved by County voters in November 1994. Measure A anticipates that the principal feature of a County-adopted reuse plan for MCAS El Toro should be a commercial airport serving a substantial portion of the County's demand for commercial passenger and air cargo service. Measure A also established the 13-member El Toro Airport Citizens Advisory Commission (CAC) to advise the Board of Supervisors and Orange County Planning Commission on base reuse.</p> <p>In April 1995, the Office of Economic Adjustment (OEA) formally recognized the Orange County Board of Supervisors as the official LRA for MCAS El Toro. As the recognized LRA, the Board of Supervisors was given sole responsibility for preparing a CRP for submittal to the DON.</p> <p>Although invited and encouraged to participate in the LRA's reuse effort, a group of nine cities in southern Orange County remain opposed to the LRA's reuse planning structure, process, and adopted CRP. These nine cities formed the El Toro Reuse Planning Authority (ETRPA) as a joint powers authority created for the purpose of developing its own redevelopment plan for submittal to the DON. The OEA has indicated to ETRPA in writing that it will accept a redevelopment plan only from the County which is the officially recognized LRA and which is intended as the single point of contact on all base reuse matters.</p> <p>The LRA prepared a draft CRP and EIR which included three reuse</p>

**RESPONSE TO COMMENTS  
DRAFT BRAC CLEANUP PLAN  
MCAS EL TORO, CALIFORNIA**

<p><b>Originator:</b> Thomas B. Mathews County of Orange</p> <p><b>To:</b> Joseph Joyce, BRAC Environmental Coordinator MCAS El Toro</p> <p><b>Date:</b> 24 January 1997</p>	<p style="text-align: right;"><b>CLEAN II Program</b> Contract No. N68-711-92-D-4670 CTO-0103/0143 File Code: 0222</p>
<p><b>998-acre habitat reserve, an educational campus, research and development/light industrial, commercial/office, a multimodal transportation center, recreation, golf, public facility and institutional uses, and housing and various support services for the homeless. Figure 2-1 illustrates the land uses included in the Final CRP, and Table 2-1 summarizes the land uses by acre.</b></p> <p>Disposal of MCAS El Toro land for reuse will be conducted in accordance with the Base Closure and Realignment Act of 1990, the Pryor amendment to the Defense Authorization Act the Base Closure Community Redevelopment and Homeless Assistance Act of 1994 and its implementing regulations, and the Base Reuse Implementation Manual of 1995.</p> <p>As part of the BRAC process, the DON conducted the required DoD and federal screening process of available property at MCAS El Toro as identified in the 1993 closure actions. During this process, eight formal applications were submitted. Applications submitted by the Department of Interior for a land exchange and the Department of Justice/Federal Bureau of Prisons were subsequently withdrawn by the applicants. Six applications by DoD and federal Agencies are pending.</p> <p>The LRA provided its recommendations on each of these requests to the Assistant Secretary of the Navy in early 1995. The LRA recommended that requests by the Department of Interior for a habitat reserve, the Federal Aviation Administration and the California Air National Guard be approved. The LRA recommended that the remaining requests be denied. Figure 2 - ____ depicts the locations of the federal conveyances endorsed by the LRA. A summary of the pending federal requests and the LRA's adopted recommendations are provided in Table 2-2. No surplus property determination has been made for MCAS El Toro, and none of the transfer actions has been approved by the Assistant Secretary of the Navy as of 15 January 1997.</p> <p>On 26 October 1994, President Clinton signed into law the Base Closure Community Redevelopment and Homeless Assistance Act of 1994.</p>	<p><b>alternatives. The LRA conducted an analysis of these three alternatives and provided extensive opportunities for public participation and input. Reuse Alternative A—Commercial Passenger/Cargo Use (the proposed project)—provided for a full service commercial passenger and cargo airport and compatible non-aviation uses. Reuse Alternative B—Cargo/General Aviation Use—provided for a cargo and general aviation airport and compatible non-aviation uses. Reuse Alternative C—Nonaviation—provided for non-aviation uses including educational campus, visitor-oriented attractions, research and development, and other uses.</b></p> <p>In August 1996, the LRA issued the draft MCAS El Toro CRP, draft HAS, and draft EIR for a 67-day public review and comment period. In the Fall of 1996, the Orange County Airport Commission, the El Toro Airport CAC, and the Orange County Planning Commission conducted public meetings/hearings and adopted recommendations to the Board of Supervisors on the draft CRP, HAS, and EIR.</p> <p>On 11 December 1996, the Orange County Board of Supervisors adopted the final MCAS El Toro CRP (P&amp;D Consultants Team 1996), which provides for future study of a full service commercial passenger and cargo airport and compatible nonaviation uses. The nonaviation uses include a 998-acre habitat reserve, an educational campus, a research and development/light industrial area, commercial office space, a multimodal transportation center, recreation area, golf course, public facility and institutional use area, and housing and various support services for the homeless. Figure 2-1a (Recommended Disposal and Reuse Parcels) illustrates the land uses included in the final CRP, and Table 2-1a (Community Reuse Plan Parcel Data Summary) summarizes the land uses by acre.</p> <p>Disposal of MCAS El Toro land for reuse will be conducted in accordance with the Base Closure and Realignment Act (BRAC) of 1990, the Pryor amendment to the National Defense Authorization Act, the Base Closure</p>

**RESPONSE TO COMMENTS  
DRAFT BRAC CLEANUP PLAN  
MCAS EL TORO, CALIFORNIA**

<p><b>Originator:</b> Thomas B. Mathews County of Orange</p> <p><b>To:</b> Joseph Joyce, BRAC Environmental Coordinator MCAS El Toro</p> <p><b>Date:</b> 24 January 1997</p>	<p style="text-align: right;"><b>CLEAN II Program</b> Contract No. N68-711-92-D-4670 CTO-0103/0143 File Code: 0222</p>
<p>Implementing regulations for this Act were subsequently published by the DoD and U.S. Department of Housing and Urban Development (HUD) in August 1995. The Act and implementing regulations significantly changed the process for the state/local and homeless provider screening process which was formerly the responsibility of the Military Department under the McKinney Act. Under the new requirements, responsibility for this screening process was assigned to the IRA.</p> <p>In accordance with the Base closure Community Redevelopment and Homeless Assistance Act, the LRA requested that MCAS El Toro be included under the provisions set forth by the Act. In the Fall of 1995, the LRA conducted the state/local and homeless provider screening process in accordance with the Act and its implementing regulations. Figure 2-_____ illustrates the state/local homeless provider conveyances recommended by the LRA in the Final CRP. Table 2-____ provides a summary of each of the recommended conveyances.</p> <p>The LRA's CRP reflects local needs as identified by the LRA and indicates the LRA's preference for the use of parcels available at MCAS El Toro. The CRP will generally be used as the basis for the proposed action in conducting the environmental analysis, or Environmental Impact Statement (EIS) as required under the National Environmental Policy Act (NEPA). The CRP serves as a blueprint for local base redevelopment and economic adjustment activities and provides input for the Military Department's National Environmental Policy Act (NEPA) analysis.</p> <p>The EIS and a disposal plan will be prepared by the Military Department no later than 12 months after receipt of the Final CRP. The disposal plan will specifically address the methods for disposal of base property at the installation, including conveyances for homeless assistance, public benefit transfers, public sales, economic development conveyances, and other disposal methods. Parcel recipients and disposal methods cannot be finalized until a Disposal and Reuse (D&amp;R) ROD is issued.</p> <p>Currently, one public highway expansion project has resulted in the</p>	<p>Community Redevelopment and Homeless Assistance Act of 1994, and its implementing regulations, the Base Reuse Implementation Manual of July 1995.</p> <p>As part of the BRAC process, the DON conducted the required Department of Defense (DoD) and federal screening process of available property at MCAS El Toro as identified in the 1993 closure actions. During this process, the following DoD and federal agencies submitted formal applications for MCAS El Toro property:</p> <ul style="list-style-type: none"> <li>• Defense Commissary Agency;</li> <li>• Department of the Air Force/California Air National Guard;</li> <li>• Department of the Army/Army Reserve Command;</li> <li>• Department of Interior-Habitat Reserve;</li> <li>• Department of Interior-Land Exchange;</li> <li>• Department of Justice/Federal Bureau of Prisons; and</li> <li>• Federal Aviation Administration.</li> </ul> <p>Immigration and Naturalization Service applications submitted by the Department of Interior for a land exchange and the Department of Justice/Federal Bureau of Prisons were subsequently withdrawn by the applicants. Six other applications by the DoD and federal agencies are pending.</p> <p>The LRA provided its recommendations on each of these requests to the ASN in early 1995. The LRA recommended that requests by the Department of Interior for a habitat reserve, the Federal Aviation Administration and the California Air National Guard be approved. The LRA recommended that the remaining requests be denied. No surplus property determination has been made by MCAS El Toro and none of the transfer actions has been approved by the ASN as of 15 January 1997.</p> <p>On 26 October 1994, President Clinton signed into law the Base Closure Community Redevelopment and Homeless Assistance Act of 1994.</p>

**RESPONSE TO COMMENTS  
DRAFT BRAC CLEANUP PLAN  
MCAS EL TORO, CALIFORNIA**

<p><b>Originator:</b> Thomas B. Mathews County of Orange</p> <p><b>To:</b> Joseph Joyce, BRAC Environmental Coordinator MCAS El Toro</p> <p><b>Date:</b> 24 January 1997</p>	<p style="text-align: right;"><b>CLEAN II Program</b> Contract No. N68-711-92-D-4670 CTO-0103/0143 File Code: 0222</p>
<p>transfer of MCAS El Toro property. This project is the Bake Parkway/Interstate 5 project. The County and DON have entered into an agreement permitting transfer by quitclaim deed for the Bake Parkway/Interstate 5 right-of-way at fair market value.</p> <p>As mandated by CERFA...[continue with remainder of page 2-3 and 2-4].</p>	<p>Implementing regulations for this Act were subsequently published by the DoD and U.S. Department of HUD in August 1995. This Act and implementing regulations significantly changed the process which was formerly the responsibility of the Military Department under the McKinney Act. Under the new requirements, responsibility for this screening process was assigned to the LRA.</p> <p>In accordance with the Base Closure Community Redevelopment and Homeless Assistance Act, the LRA requested that MCAS El Toro be included under the provisions set forth by the Act. In the fall of 1995, the LRA conducted the state/local and homeless provider screening process in accordance with the Act and its implementing regulations.</p> <p>The LRA's CRP reflects local needs as identified by the LRA and indicates the LRA's preference for the use of parcels available at MCAS El Toro. The CRP will generally be used as the basis for the proposed action when conducting the environmental analysis, or Environmental Impact Statement (EIS) as required under the National Environmental Policy Act (NEPA).</p> <p>The EIS and a disposal plan will be prepared by the Military Department no later than 12 months after receipt of the final CRP. The disposal plan will specifically address the methods for disposal of base property at the installation, including conveyances for homeless assistance, public benefit transfers, public sales, economic development conveyances, and other disposal methods. Parcel recipients and disposal methods cannot be finalized until a disposal and reuse Record of Decision (ROD) is issued.</p> <p>Currently, one public highway expansion project will result in the transfer of MCAS El Toro property. This project is the Bake Parkway/Interstate 5 project. The County and DON have entered into an agreement permitting transfer by quitclaim deed for the Bake Parkway Interstate 5 right-of-way at fair market value.</p>

**RESPONSE TO COMMENTS  
DRAFT BRAC CLEANUP PLAN  
MCAS EL TORO, CALIFORNIA**

<p><b>Originator:</b> Thomas B. Mathews County of Orange</p> <p><b>To:</b> Joseph Joyce, BRAC Environmental Coordinator MCAS El Toro</p> <p><b>Date:</b> 24 January 1997</p>	<p style="text-align: right;"><b>CLEAN II Program</b> Contract No. N68-711-92-D-4670 CTO-0103/0143 File Code: 0222</p>
<p><b>COMMENT 5:</b> [Note: Table 2-1a should be replaced with Table 1-1 (attached) from the adopted CRP. Table 2-1b should be revised to show the “proposed reuse” and “property recipients” as included in the Final CRP. Figure 2-1a should be replaced with Figure 1-1 (attached) from the adopted CRP. Figure 2-1b and Figure 2-1c for Reuse Alternatives B and C should be deleted.]</p>	<p><b>RESPONSE 5:</b> Table 2-1a and Figure 2-1a have been revised, as indicated.</p> <p>Table 2-1b has not been updated with information from the CRP. The information presented in 2-1b coincides with parcel designations based on current land use. Detailed parcel maps based on the CRP were unavailable, so the locations of concern (LOCs) could not be plotted within the recommended reuse parcels presented in the CRP. As the reuse parcels are finalized in the D&amp;R ROD, the parcel designations in the BCP will be modified.</p>
<p><b>COMMENT 6:</b> [Note: Figure 3-4: Federal Conveyances (attached) and Table 3-1: Federal Screening Request Recommendations (attached) for the Final CRP should be inserted.]</p>	<p><b>RESPONSE 6:</b> Due to the summary nature of the BCP, the figure and table were not included in the text.</p>
<p><b>COMMENT 7:</b> [Note: Figure 3-5 - Recommended State, Local and Homeless Provider Conveyances - (attached) and Table 3-2 - Notice of Interest Applications Recommended as Part of the community Reuse Plan - (attached) from the adopted CRP should be inserted.]</p>	<p><b>RESPONSE 7:</b> Due to the summary nature of the BCP, the figure and table were not included in the text.</p>
<p><b>COMMENT 8:</b> <u>Chapter 3 - Installation Environmental Program Status</u> - This chapter should be updated to incorporate pertinent information included in Final EIR No. 563 prepared by the LRA for the Community Reuse Plan, especially in regard to the Biological and Cultural Resources Technical Reports included in the Final EIR.</p>	<p><b>RESPONSE 8:</b> Information in Chapter 3 has been reviewed and updated based on comments from SWDIV and Station staff, including the BRAC Office. Pertinent information from the Final EIR is not likely to effect Sections 3.1, 3.2, 3.4, and 3.5.</p> <p>Information from the following reports was used to update Section 3.3.</p> <ul style="list-style-type: none"> <li>• Dames &amp; Moore. 1996. MCAS El Toro Conservation Plan. August.</li> <li>• JPR Historical Consulting Services. 1996. Historic Context and Proposal for Inventory and Evaluation Work At Marine Corps Air Station (MCAS) El Toro. Draft. Prepared for KEA Environmental. August.</li> </ul>

**RESPONSE TO COMMENTS  
DRAFT BRAC CLEANUP PLAN  
MCAS EL TORO, CALIFORNIA**

<p><b>Originator:</b> Thomas B. Mathews County of Orange</p> <p><b>To:</b> Joseph Joyce, BRAC Environmental Coordinator MCAS El Toro</p> <p><b>Date:</b> 24 January 1997</p>	<p style="text-align: right;"><b>CLEAN II Program</b> Contract No. N68-711-92-D-4670 CTO-0103/0143 File Code: 0222</p>
	<ul style="list-style-type: none"> <li>• KEA Environmental. 1996. Base Realignment Archeological Survey Report, Marine Corps Air Station, El Toro. Prepared for SWDIV, Naval Facilities Engineering Command. September.</li> </ul>
<p><b>COMMENT 9:</b> <u>Chapter 6 - Technical and Other Issues to Be Resolved</u> - Section 6.19 "Interfacing with the Community Reuse Plan" on page 6-13 should be revised as follows:</p> <p>On December 11, 1996 the Board of Supervisors adopted the Final MCAS El Toro Community Reuse Plan (CRP) (P&amp;D Consultants, Inc., December 1996) which provides for more detailed study of a full-service commercial passenger and cargo airport, as well as compatible nonaviation uses. The adopted Community Reuse Plan and Homeless Assistance Submission were submitted to the Assistance Secretary of the Navy and the U.S. Department of Housing and Urban Development (HUD) on December 13, 1996.</p> <p>Regular meetings and clear communication between the BCT members and the LRA will be critical to incorporate the adopted CRP into the restoration plans for the station. As of January 1997, regular meetings with LRA staff were in progress.</p>	<p><b>RESPONSE 9:</b> Comment incorporated.</p>
<p><b>COMMENT 10:</b> <u>Chapter 7 - References</u> - The list of reference documents should be revised to include the Final MCAS El Toro Community Reuse Plan and Final EIR No. 563, including the numerous technical studies and reports incorporated therein.</p>	<p><b>RESPONSE 10:</b> The reference section has been updated to include appropriate documents.</p>