

FINAL RAB COMMENTS ON DRAFT BRAC CLEANUP PLAN UPDATE #1 24 January 1995

GENERAL:

The report is well organized and generally clear, although the reader may have to wait for the tables to find out when certain actions were scheduled to be taken. (The tables and page numbers in contents are incorrect). The text gives schedule information for some items, but not for others (e.g. boat channel sediments, storm drains).

Page	Comment
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1.	ES-1: "...comments from various sources, ... will be considered..." It would appear that those of the NTC RAB will not be considered. to any great extent.
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2.	ES-2 para. 2, line 4: "point of interest" should be defined in words.
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3.	ES-2: "Initiatives for Accelerating Cleanup ... NTC has accelerated cleanup schedules for sites by overlapping phases of the cleanup process, thereby demonstrating a bias for cleanup instead of studies... application of presumptive remedies at NTC... teambuilding with the regulatory community... developing community reuse plan and schedule are considered..."
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A step by step process, doing careful work should be the "bias." Studies that prevent mistakes play an important role in this process. The "application of presumptive remedies" is another way of saying that the method of performing the work is based on assumptions. There must be a more professional way (than this end-run on expert consulting) to make sure that the job is done right the first time. That the (presumed) regulatory agencies have provided members of the BRAC cleanup team is obscene. If, in the future, something were to go wrong, the "teambuilding"/conflict of interest would be difficult to justify. Have the legal aspects of the haste/waste of the plan been examined in any detail? Awaiting the community reuse plan, etc. has already been ignored.

4.	The Executive Summary casts doubt on the professionalism/adequacy of the BRAC cleanup team and the organization(s) supporting it.
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The following examples indicate that the BCT has not provided information to the RAB and/or has not given appropriate consideration to the contributions of the RAB:

5.	1-8 para. 1.5.3: Delete "Commissioned Officers" from the next-to-last sentence; the Admiral Kidd Club is now an "All-hands" facility.
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6. 1-9 para. 1.5.4: Near the end of the fourth paragraph, insert the word "private" between the last two words, "and" and "aircraft" to recognize the use of Lindbergh Field occasionally by civilian-owned pleasure aircraft.
7. 1-11 and 3-26: Is Celeste Albanez still the Public Participation Specialist? We had been informed that she is no longer working in this capacity. Please advise.
8. 1-15 Table 1.3: Mention should be made here of the Golf Course Maintenance Shop (BRAC Site 6).
9. 2-2... "on 8 August 1994, SWDIV awarded a contract to Ogden ... to prepare the EIS/EIR contract..." Not communicated to RAB.
10. 2-2 In the list of para. 1: define "transitional housing".
11. 2-3 This is not a comment regarding the BRAC document but rather the implied process. The Plan states that the Secretary of Defense will enter into agreements to transfer contaminated property "to any person who agrees to perform all environmental restoration....". What is the oversight on this process? How do we insure that the restoration is done? Who decides what restoration is to be done? Please clarify this statement In the document.
12. 2-3 para 4, line 9: Clarify "stored". Is meaning "existed"
13. 2-4 last para, line 7: What is "footprint"?
14. Chapter 3: General: Reference to the potential contamination by pesticides at site 6 (the golf course should be made, perhaps in pages 3-14 through 3-16.
15. 3-1 "... the U.S. Navy is the lead `federal' agency...". Who is watching whom? [See ES2]
16. 3-1 LRA should be changed to reflect the existence of the Mayor's Base Reuse Committee. Since there is specific information available, it should be used in the document.
17. 3-1 AOC vs PO1: Environmental Health Coalition requests that the BCT team follow the guidelines AOC vs and continue to refer to Areas of Concern as AOCs and not Points of Interest. These documents are confusing enough and the Navy should strive for consistency in language wherever possible.
18. 3-2 to page 3-5: Sites 2, 7, 8 and 9 are reported to have remediation completed by 1995. Does that mean by 1 January 1995?

19. 3-2 "Site 2:...Remediation of the site begin in November 1994..." Remediation was not communicated to the RAB. On 6 Dec. '94. the RAB was presented with the BCT responses to its site review. Based on the BCT responses, the comments of the RAB were, in general, ignored.
20. 3-2/3-3 "Site 3:... A contract to conduct an ESA and [[a] TS has been awarded..." RAB comments were elicited, but there has been no BCT response other than going ahead.
21. 3-3 "Site 4;... A PA has been conducted at this site... A Final PA report was produced in November 1994 and submitted to the regulators..." The RAB was told that further Information re Site 4 should be coming from Washington, D.C. It would appear that the BCT went ahead with its plans and ignored (and/or lied to) the RAB in this instance
22. 3-3/3-4 "Site 7 ..."; "Site 8 ..."; "Site 9:..." The comments re Site 2 pertain to Sites 7, 8, and 9. There are members of the RAB who have the expertise (and/or know where to obtain it) to provide solutions to the NTC cleanup problems. Unfortunately, at every turn, the BCT has chosen to ignore their contributions.
23. 3-5 In the section on tanks of unknown status, some plan should be mentioned or a reference given to future action.
24. 3-9 para. 2, last sentence: More explicit information should describe "soil sampling"
25. 3-10 para 2: What are plans for grenade range cleanup?
26. 3-13 para 3.1.4: Add a final sentence to the "Site 1" paragraph to the effect "The site has been designated a California Least Tern Protected Area." Linkage referring to page 3-17, para 3.2.12 should be offered here.
27. 3-23 para. 3.4.7: Again, mention should be made here of the potential pesticide contamination at site 6 para 3.4.7 (the golf course.)
28. 3-25 The initial Community Relations Plan was produced in 1992 on page 3-25 and in 1993 on page 3-26.
29. 3-71 Figure 3-4: We cannot see where any estuarine or wetland habitat is demarcated. It is our understanding that there are areas that qualify in the boat channel for this designation but they are not listed on the map. Please clarify.

30. 4-3 EHC Is glad to note that the residential exposure scenario will be employed for risk assessment.
31. 4-4 para 4, Site 10, Second sentence: What are "traditional sampling points"?
32. 4-8 Last para: What is an "ordnance sweep"? How is it done? What types of equipment?
33. 6-4 Please clarify how the background levels will be determined. (6.4.3)
34. 6-5 Another point of order, EHC requests copies of all minutes of the meeting of the risk assessors and an opportunity for the RAB to review and approve the assumptions used for the calculations.
35. Appendix A is entitled "Fiscal Year Funding Requirements/Costs" but contains no information. Tables B-1, B-3, and 4-4 list numerous ongoing contracts for which funding must be obligated. **REQUEST RAB BE TOLD HOW MANY TAXPAYER DOLLARS ARE ALREADY OBLIGATED TO THE NTC BASE CLEANUP PROGRAM.**