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MCAS EL TORO
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IN REPLY REFERENCE: CTO-0063/0181

November 21, 1995

Commanding Officer
Naval Facilities Engineering Command
Southwest Division
Mr. Paul Kennedy, Code 0233
Building 128
1220 Pacific Highway
San Diego, CA 92132-5187

Subject: Responses to Comments for MCAS Tustin and
MCAS El Toro Draft Revised Community Relations Plans

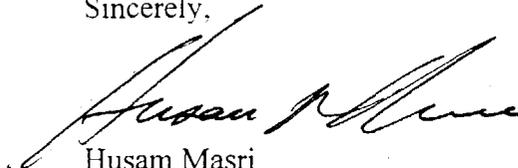
Dear Mr. Kennedy:

Enclosed are the responses to comments on the Draft Revised Community Relations Plans for MCAS Tustin and MCAS El Toro.

We look forward to concurrence or discussion on these comments as soon as possible so that we may distribute the Plans to their respective Restoration Advisory Board.

Please call me at (415) 768-4612 if you have any questions regarding these responses.

Sincerely,



Husam Masri
Project Manager, MCAS Tustin

HNМ/aqr

Enclosure: Responses to Comments



Bechtel National, Inc. Systems Engineers-Constructors

U.S. Navy CLEAN Tustin/AMVICRPLET RTC

**RESPONSE TO COMMENTS
MARINE CORPS AIR STATION - TUSTIN, CALIFORNIA
DRAFT REVISED COMMUNITY RELATIONS PLAN**

Italicized print indicates new/revised text

September 14, 1995

Comments by: Marsha Mingay, DTSC, Long Beach, CA

Number	Specific Comments	Response
1	Introduction. Second paragraph, second to the last sentence, add DTSC's Public Participation Manual.	Comment will be incorporated.
2	Figure 2. Please clarify my confusion, how is this figure a map of existing off-base land use when most of the areas are not identified by their use.	Figure 1-2 will be renamed <i>Detailed Base Location Map</i>
3	1.2 Description of Local Communities. Please provide data references for the statistics and conclusions stated in these paragraphs. Without the references, the conclusions and statistics can be read as less than factual information. My concern is that if community members disagree with the conclusions or statistics, it may weaken the impact of the factual material presented from the interviews. Examples include: "the fastest growing city in the county" ". . . the community has closely associated itself with MCAS Tustin" "Irvine is the nation's largest master-planned community" demographics	Text has been revised to include references and sources of information for the statistics and conclusions in Section 1.2. Text will reference the Office of the Mayor, City of Irvine, the City of Santa Ana, the City of Tustin and the Tustin Chamber of Commerce.
4	2.1 History of Community Involvement. Page 2-1, fourth paragraph, since the RAB has not yet been introduced, provide some clarification (or reference appropriate section). Same paragraph, add information that a community co-chair was selected pursuant to DOD guidelines for RABs.	The second sentence of this paragraph will be reworded to read: <i>The Restoration Advisory Board (RAB) was established in 1994 in accordance with these guidelines, to involve the communities surrounding MCAS Tustin in the decision-making process of the Restoration Installation Program. Section 3.2.2.1 provides additional information on the RAB.</i>

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		The following text will be added to the fifth sentence of this paragraph: <i>Pursuant to DOD guidelines for RABs and assure equal representation of the community's concerns...</i>
5	2.2 Community Interview Results. Verify the number of interviewees. Was it 31 for Tustin?	Actual number of interviews (people who provided information on MCAS Tustin) was 36. This number is based on the final Thank You letters mailed to these individuals by the Marine Corps.
6	2.2.1. Environmental. A suggestion is made to utilize the written summaries to state the major themes and distinctions made within the interviewees. Following this idea, elaborate more on a major theme present in the interviews, namely fear that the project will produce unnecessary years of studies and assessment, and a related fear of military compromise on cleanup efforts because of high costs (see last bullet). Second paragraph, first sentence, change to, "Due to the longer history of MCAS El Toro's environmental activities (<i>e.g., groundwater investigation and proposed cleanup technologies</i>) and the . . . Many of those interviewed explained that the greater <i>media</i> attention . . ." (italics were use to indicate suggested word change).	No change necessary per discussion with M. Mingay (11/21/95). Suggested changes will be incorporated; however the current statement about <i>controversies over its reuse</i> should remain as this was stated by the interviewees as the issue was the catalyst for brining environmental activities to the forefront of reuse discussion.
7	2.2.1. Restoration Advisory Board. According to my notes, 17 interviewees stated that they were unaware of the RAB. Please review and assess your data supporting this conclusion. The following is suggested, "The majority of those interviewed, who were not associated to the Restoration Advisory Board, were unaware of the	Suggested changes will be incorporated. First two sentences of Section 2.2.1.4 Restoration Advisory Board will read: <i>Approximately half of those interviewed, who were not associated with the MCAS Tustin RAB, were unaware of the RAB and its purpose. Of these, most indicated a desire to receive additional</i>

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	RAB and its purpose. However, after interviewees were informed of the RAB, most indicated in receiving more information.”	<i>information on the RAB. Of those respondents who were aware of the RAB, half consider the board effective in its contributions to the base’s environmental programs.</i>
8	Table 3-2. Add a check for information repositories for non-time critical removals.	Suggested change will be incorporated.
9	3.2.1 Fact Sheets. Page 3-6, last sentence in this section, add “general public” to list of entities receiving fact sheets.	Suggested change will be incorporated to read: ... homeowners’ associations, <i>members of the RAB, and members of the general public.</i>
10	3.2.2.2 Public Meetings. Correct information to reflect that public meetings at the conclusion of a site investigation, the conclusion of a remedial response actions, or for removal actions are not required by law or regulation. They are, however, very much appreciated.	The first three sentences of Section 3.2.2.2 will be revised to read: <i>As required by federal and state environmental regulations, a public meeting will be held to present preferred cleanup alternatives for remedial response actions. Public meetings at the conclusion of a site investigation, the conclusion of a remedial response action, or for removal actions are not required by law or regulation. However, they are encouraged by the public and effective in supporting a good relationship with the base. The meetings may present, for example, a summary of...</i>
11	3.2.3.1 Mailing List. Please list all categories which must be included in a mailing, or provide the complete listing or categories in	Section 3.2.3.1 mailing list categories will be expanded to include the same list provided in last paragraph of Section 3.2.1.1 (Fact

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	the appendix.	Sheets).
12	3.2.3.2 Evaluation of Community Relations Activities. Please clarify who will review the public information and activities described in this plan. And elaborate on how they will be evaluated.	Section 3.2.3.2 will be revised to read: <i>The public information...will be reviewed quarterly by the Marine Corps/Navy and their community relations contractors for effectiveness in meeting community relations program goals and objectives. The lead regulatory agency, the California Environmental Protection Agency's Department of Toxic Substances Control, Public Participation Unit also may evaluate activities for their effectiveness. Recommendations for improved community relations activities and enhanced public participation will be communicated in writing to MCAS Tustin. Such recommendations also will be welcomed from members of the MCAS Tustin community.</i>
13	3.2.3.3 Community Relations Program Revisions. The last sentence on page 3-10 assumes that the RI/FS will be complete at the time of the next CRP revision. Please provide the basis for this, or revise the sentence to include this phase of the project.	Following the first sentence of Section 3.2.3.3, text will be inserted to read: <i>Revisions to all or parts of the Plan may be made in order to incorporate new information, reflect changes in community concern, and adjust public participation activities to meet these changes. A revised Plan ensures that the Marine Corps/Navy remains sensitive to community concerns through all phases of the project. Regular revisions to the Plan will be scheduled for no more than two years from the completion of the current Plan or at the start of remedial actions supporting the basewide Record of Decision (supporting the basewide Feasibility Study), if this occurs sooner than two years. The second and third sentences in the current version will remain.</i>

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Number	Specific Comments	Response
14	<p>Appendix C Community Interviews</p> <p>7 Radio Stations. Add KLOS, KFWB and KOCE.</p>	Suggested change will be incorporated.
15	<p>Appendix C Community Interviews</p> <p>8 TV Stations. Add CNN, Channel 4 and Channel 7 to this section and, when applicable, Appendix D.</p>	CNN and Channel 4 are currently listed in Appendix C(8). Channel 7 will be added. Channels 7 and 4 are currently listed in Appendix D (page D-3). CNN is not considered a local media resources and, therefore, is not included in Appendix D, per discussion with BRAC Public Affairs Officer.
16	<p>Page C-14 Community-At-Large. EPA's Superfund guide, page 27 states, "the names . . . of private citizens contacted for interviews should not be included as part of the plan that is made public." Please delete them from the listing. A suggestion is made to include the category name and follow it with a sentence which reads, "The list of private citizens interviewed is maintained separately to protect their privacy."</p>	Per discussion with M. Mingay (11/21/95) a DTSC policy, issued since this comment was submitted, requires the inclusion of "community-at-large" interviewee names in the Plan. Text will remain.
17	<p>Appendix D Contacts for Targeted Involvement and Outreach. Please verify that we have included all interested and affected school districts.</p>	Contact information for the affected schools in the neighboring districts has been added to Appendix D.

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October 3, 1995

Comments by: Virginia Garelick, SWDIV, San Diego, CA

Letter	Specific Comments	Response
a	The purpose of the subject document is to describe how DON will ensure community participation in the decision making process regarding the investigation and remediation of hazardous waste sites at MCAS Tustin. The document was well written and adequately followed U.S. EPA guidance.	
b	Has any consideration been given to expand PR efforts to include CNO and DOD Hqs? Although this activity is not within the scope of CTO 63, recommend that some effort be made to publicize MCAS Tustin success stories in periodicals that are read by the people who determine the environmental budget for MCAS Tustin. Our environmental PAO has provided press releases about MCAS Tustin to "Inside EPA" and "Defense Environmental Alert". In addition to these press releases, recommend developing articles for distribution to appropriate publishers to showcase MCAS Tustin. Given the current workload of our environmental PAO, recommend that the Base PAO be responsible for this activity.	Text currently discusses opportunities for development and distribution of information promoting success stories, based primarily on significant technical milestones (Page 3-6, Section 3.2.1.3). Per discussion with the BRAC Public Affairs Officer, base public affairs activities are the responsibility of the SWDIV environmental PAO or the BRAC PAO, as there is no designated base PAO. Captain Bartelt also stated that it is not standard media relations practice for complete articles to be provided to the local or regional media that is targeted in the Plan.
c	According to the subject document, nearly 30% of the population of Tustin is Hispanic. In light of this, suggest that at least some of the fact sheets be written in English and Spanish (see example attached).	During community interviews, Tustin residents and municipal representatives were asked about the need for Spanish or Asian translation of community relations material. There was not a strong need for this translation expressed; they emphasized that providing information to the Spanish-speaking media would be more effective. Spanish language radio and newspaper contacts, as well as the Hispanic Chamber of Commerce, are listed in Appendix D and will receive all written information. Text will be added to Section 3.2.1.1, Page 3-6, to read: <i>If the need arises, or upon the request of the Hispanic, Asian, or other minority communities, fact sheets and other written material will be provided in languages other than English.</i>

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d	I noticed that the Asian community represented 10 percent of the population of Tustin and Santa Ana, respectively, and nearly 20 percent of the population of Irvine; however, no newspaper or periodical targeted to this community was listed in Appendix C (Contacts for Targeted Involvement and Outreach). Is the majority of the Asian population represented by one or two ethnic groups (e.g., Vietnamese, Filipino)? Please clarify.	<p>During community interviews, Tustin, Santa Ana, and Irvine residents and municipal representatives were asked about the need for Spanish or other language translations of community relations material. It was stated on several occasions that the majority of the Asian community also speaks English and translation may not be necessary. They emphasized use of the print media for communication with the minority neighborhoods, as minority newspapers will translate material for publication. As stated above, material translated by the Marine Corps/Navy will be provided as necessary. Appendix D includes contacts for Hispanic media outlets and a minority community organization in the region of concern.</p> <p>Statistics provided to us by the municipalities do not break down the Asian populations.</p>
e	Table 3-1 (Timing and Overview of Community Relations Activities for Remedial Response Actions): Suggest adding the following activity to the list of community relations techniques: "articles in periodicals".	<p>It is not standard media practice that "articles" are provided for publication in periodicals. Articles are written by the periodicals from press releases provided by the project or at the request of the periodical. Extensive amounts of time and resources can be spent writing an article for a targeted periodical that will not be printed unless prior acceptance has been granted by the publisher/editor. Press releases will be developed and distributed at appropriate project milestones and to promote "success stories".</p>
f	Page 3-6, Public Notices, Press Releases, and Media Events: Regarding removal actions, please clarify that a notice of availability/description of the EC/CA will be published.	<p>Section 3.1.2 references the public notice required to announce the availability of removal action documents for public review (first bullet point on page 3-3). The first sentence of Section 3.2.1.3 (page 3-6) states the public notices will be distributed announcing opportunities for public comment on proposed removal activities. Language specifying documents (EE/CAs, Proposed Plans) was averted to avoid explanations of particular documents within the</p>

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g	Page 3-8, Public Meetings: The subject document states that "a public meeting will be held at the conclusion of site investigations, at the presentation of preferred cleanup options, and at the conclusion of remedial response actions." Suggest holding a public meeting for the "kick-off" or remedial/removal projects, too.	text. Table 3-2 also indicates that a public notice and description of an EE/CA will be provided for non-time critical removal actions. The first three sentences of Section 3.2.2.2 will be revised to read (per response to M. Mingay's comments): <i>As required by federal and state environmental regulations, a public meeting will be held to present preferred cleanup alternatives for remedial response actions. Public meetings at the conclusion of a site investigation, the conclusion of a remedial response action, or for removal actions are not required by law or regulation. However, they are encouraged by the public and effective in supporting a good relationship with the base. The meetings may present, for example, a summary of...</i>
h	According to the community interview response summary (Appendix C), several interviewees believed "that more media involvement is needed [since] the RAB is not effective in getting the word out." Interviewees suggested that articles be provided to various media sources (e.g., Chambers of Commerce, Orange County Business Journal). Has this activity been accomplished? If not, suggest providing boiler-plate articles (along with the press releases) to targeted media sources.	See response to B and E above.
i	I noticed that the Orange County Metro magazine was not listed in Appendix D (Local Media Resources) even though this was listed as a valuable resource during the community interviews. Suggest adding this contact to the list.	Orange County Metro magazine has been added to Appendix D.
j	How will the effectiveness of the current community relations efforts	Section 3.2.3.2 will be revised to read: The public

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	<p>be monitored? Will there be follow-up surveys? Please clarify.</p>	<p><i>information...will be reviewed quarterly by the Marine Corps/Navy and their community relations contractors for effectiveness in meeting community relations program goals and objectives. The lead regulatory agency, the California Environmental Protection Agency's Department of Toxic Substances Control, Public Participation Unit also may evaluate activities for their effectiveness. Recommendations for improved community relations activities and enhanced public participation will be communicated in writing to MCAS Tustin. Such recommendations also will be welcomed by members of the MCAS Tustin community.</i></p> <p>Following the first sentence of Section 3.2.3.3, text will be inserted to read: <i>Revisions to all or parts of the Plan may be made in order to incorporate new information, reflect changes in community concern, and adjust public participation activities to meet these changes. A revised Plan ensures that the Marine Corps/Navy remains sensitive to community concerns through all phases of the project. Regular revisions to the Plan will be scheduled for no more than two years from the completion of the current Plan or at the start of remedial actions supporting the basewide Record of Decision (supporting the basewide Feasibility Study), if this occurs sooner than two years. The second and third sentences in the current version will remain.</i></p>

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November 15, 1995

Comments by: Capt. Brad Bartelt, BRAC, San Diego, CA

Letter	Specific Comments	Response
1	Executive summary - Under information collected during interviews the majority of folks expressed a concern in credibility, mainly because they were concerned about funding or lack thereof. Others, although very few, expressed a concern about the military's history of lack of openness. More folks expressed concern or rather open distrust of state and local governments.	The following text will be inserted after the second sentence of the fifth paragraph of the Executive Summary: <i>Concern was expressed, however, for the adequacy of Congressional funding for the cleanup program.</i>
2	1.1 -- 2nd paragraph. The sentence about base closure needs to be reworded. Congress approved the Base Closure and Realignment Commission's (BRAC) recommendation to close MCAS Tustin. In 1993, the closure of MCAS Tustin was revisited with the result of Tustin being scheduled to close by 1999.	The last sentence of second paragraph will be revised to end with: <i>the Base Realignment and Closure (BRAC) Act of 1993.</i>
3	1.2 -- "fastest growing city in the county", according to who? Irvine--nation's largest master-planned community--attribute.	Text has been revised to include references and sources of information for the statistics and conclusions in Section 1.2. Text will reference the Office of the Mayor, City of Irvine; the City of Santa Ana; the City of Tustin; and the Tustin Chamber of Commerce.
4	Figure 1-2 -- This is not a map of existing off-base land use. The only thing identified for use is the Health Care/Medical Center.	Figure 1-2 will be renamed <i>Detailed Base Location Map</i>
5	2.1 -- 1st paragraph. You might want to add...the two large hangars at the base which were once used to store blimps, etc. 4th paragraph. You should probably clarify the RAB more and add that the meetings are open to the public.	In the first paragraph, the last sentence will be expanded to read:...the large air hangars at the base, <i>historically used to store blimps.</i> The second sentence of the fourth paragraph will be reworded to read: <i>The Restoration Advisory Board (RAB) was established in 1994 in accordance with these guidelines, to involve the communities surrounding MCAS Tustin in the decision-making process of the Restoration Installation Program. Section 3.2.2.1 provides additional information on the RAB.</i>

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Letter	Specific Comments	Response
		A final sentence will be added to this fourth paragraph stating: <i>All RAB meetings are open to the public.</i>
6	2.2 -- 2nd paragraph. Text says "contentious community issue", might want to say because of the planned use of the base for a commercial airport.	A parenthetical phrase will be added to the fourth sentence: ... contentious community issue (<i>in part due to the planned use of the base as a commercial airport</i>), ...
7	3.2.1.1 -- Add that fact sheets are distributed to the general public..	Suggested change will be incorporated to read: ... homeowners' associations, <i>members of the RAB, and members of the general public.</i>
8	3.2.2.1 -- Need to include more of the mission statement in the paragraph. Promote community awareness and review, etc.	New text will be inserted after the first sentence: <i>The purpose of the RAB, detailed in the Mission Statement included in Appendix F, is to promote community awareness and obtain constructive community review and comment on environmental restoration actions to accelerate the cleanup and conversion of MCAS Tustin. It is used to disseminate information about the Installation Restoration Program and to assure opinions about environmental restoration reflect diverse interests within the community. The RAB also serves to encourage a two-way dialogue between the community and MCAS Tustin. The original second sentence will be deleted.</i>
9	3.2.3.2 -- Who does the evaluations and how? Expand, elaborate.	Section 3.2.3.2 will be revised to read: <i>The public information...will be reviewed quarterly by the Marine Corps/Navy and their community relations contractors for effectiveness in meeting community relations program goals and objectives. The lead regulatory agency, the California Environmental Protection Agency's Department of Toxic Substances Control, Public Participation Unit, also may evaluate activities for their effectiveness. Recommendations for improved community relations activities and enhanced public participation may be communicated in writing to MCAS Tustin. Such recommendations also will be welcomed from members of the MCAS Tustin community.</i>