



DEPARTMENT OF THE NAVY
SOUTHWEST DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
1220 PACIFIC HIGHWAY
SAN DIEGO, CA 92132-5190

M60050.00162

11015
Ser 231TW/224

JUL 31 1996

Mr. Gail Kobetich, Field Supervisor
Attn: Ms. Marge Nelson
U.S. Fish and Wildlife Service
2730 Loker Avenue West
Carlsbad, CA 92008-6608

Dear Mr. Kobetich:

This letter is in reference to our Installation Restoration Program (IRP) response activities at two landfill sites at Marine Corps Air Station, El Toro.

Earlier our staff met on site to discuss interim actions which are being conducted as emergency removal actions under the Comprehensive Environmental Response, Compensation, and Liability Act and the National Oil and Hazardous Substances Spill Contingency Plan Site IRP Site 2 (Magazine Road Landfill) and IRP Site 17 (Communications Station Landfill). The emergency removal actions include the installation of fencing around each of the landfill sites and other field activities to protect human health and the environment. The emergency removal actions are intended as interim actions which precede the final remedy. The final remedy has not yet been developed, however it is anticipated to be implemented within the next four years.

Due to the presence of the California gnatcatcher, we wanted to provide to you a plan that showed locations of gnatcatchers and associated vegetation. As of this date, most of gnatcatchers in the area of the proposed alignments have completed breeding activities. Sweetwater Biological Services is contracted to provide on site support during the construction of the fence and other field activities in order to reduce and/or avoid potential harassment of the gnatcatcher.

The placement of fences occurs in either existing or old firebreaks void of coastal sage scrub, in agricultural lands or along the road right of way. These alignments are provided in green in enclosure (1). The fence alignment in red is currently being evaluated as to whether it can be relocated as to avoid impacts to associated coastal sage vegetation. If we are unable to relocate those portions of the red alignment that affects coastal sage or other use areas, then we will mitigate for these actions during the implementation of the final remedy.

Construction of the fence is slated to begin the first week of August 1996 using a tractor with an attached auger to drill the post holes. Surveys for the California gnatcatcher were conducted throughout this spring. Some areas received two surveys and others three. Surveys were stopped at two visits once birds were located. Since no vegetation is affected (except non-native grasslands and annuals), we are anticipating a "no affect" as long as those birds do

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not have another nest attempt. If they do nest and it is within 150' of the fence line, that portion of the fence will be delayed until the young fledge.

We will be conducting other field activities during the implementation of the emergency removal actions at both IRP Sites 2 and 17, and we believe that our avoidance to vegetation and bird activities have reduced impacts to this species. However, there may be some areas where we cannot mitigate for vegetation impacts at this time until the closure plan is completed. There are other field activities planned for the landfill sites include the following:

- a. Removal of surface and limited subsurface landfill debris;
- b. limited grading of stream banks with placement of rip-rap along severely eroded sections to reduce erosion of landfill material;
- c. placement of debris which is collected from the stream channels at a central location at each landfill site;
- d. widening of gravel access roads;
- e. construction of staging areas and field office facilities along Magazine Road.

These are interim actions that are separate from the final remedy. All impacts to gnatcatcher habitat in the above efforts will be documented during implementation of the interim actions, assessed and mitigated for during the implementation of the final remedy at each landfill site. We recognize our responsibility to mitigate for impacts to those species protected under the Endangered Species Act (ESA). However, we want to avoid "double" mitigating during this project.

The Department of Navy is committed to complying with the ESA and would like to work with your office in developing guidelines that will allow us to conduct the interim actions and that will identify mitigation goals to be addressed in the final remedy for IRP Sites 17 and 2.

If you have any questions, please contact Mr. Tommy Wright, Natural Resource Specialist, at (619) 532-3757.

Sincerely,



MICHAEL C. STROUD
Manager, Natural Resources Branch
By direction of the Commander

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Encl:

(1) Map Site (Areas 1-3, OHM)

Copy to:

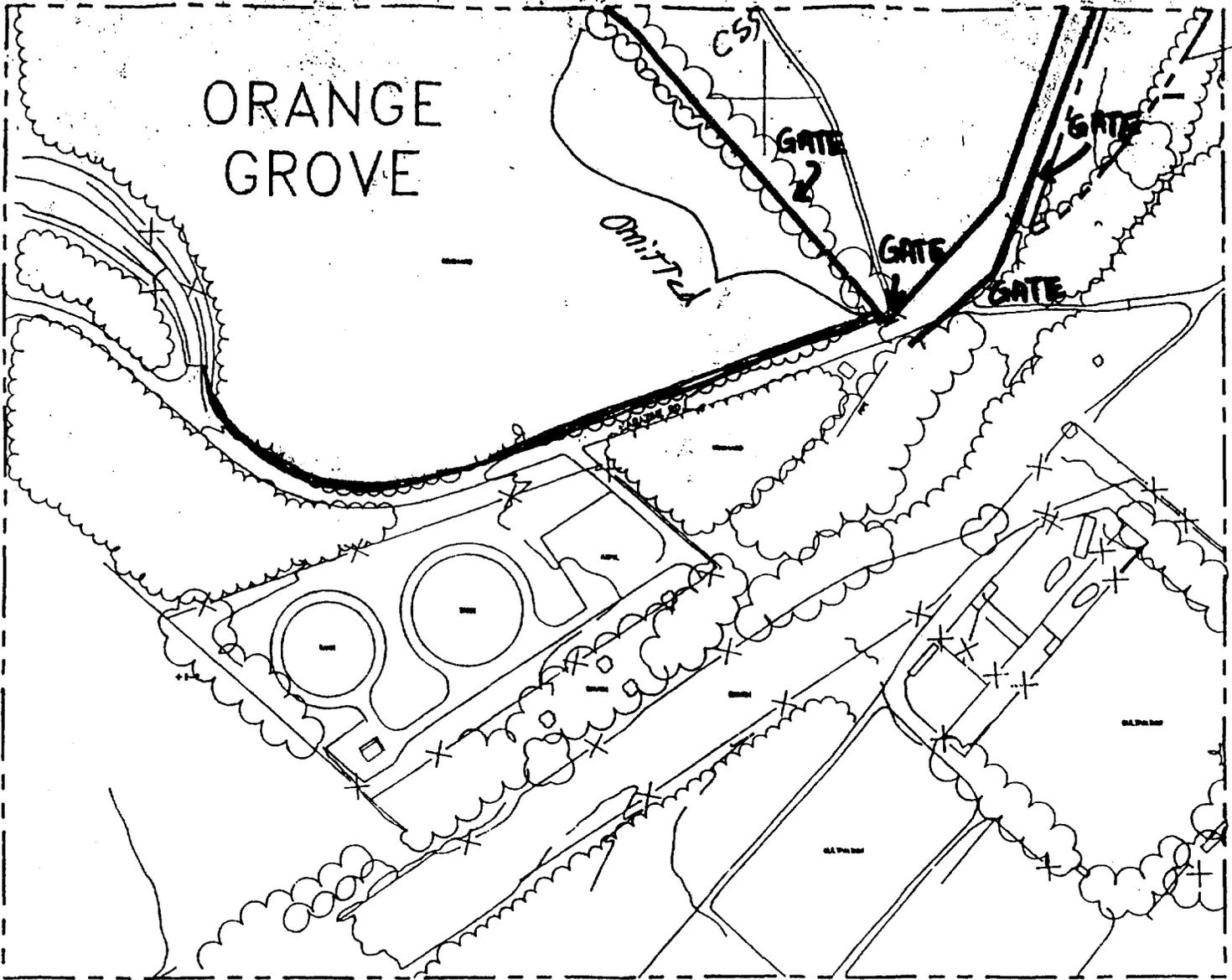
Larry Vitale, Regional Water Quality Control Board, Santa Ana Region, 2010 Iowa St.,
Suite 100 Riverside, CA 92507

Eric Stein, U.S. Army Corps of Engineer Los Angeles District, P.O. Box 2711,
Los Angeles, CA 90053-2325

Assistant Chief of Staff, Installations, Code 1JP5, Marine Corps Air Station El Toro,
P.O. Box 94003, Santa Ana CA 92709-4003

Bill Sedlak, OHM, 2031 Main St., Irvine, CA 92714

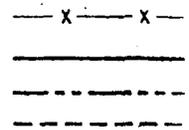
OHM PROJECT & DRAWING No.
18535-SITE PLA



OHM AREA

AREA 1

LEGEND:



LOT SCALE 1" = 200'



OHM Remediation Services Corp.

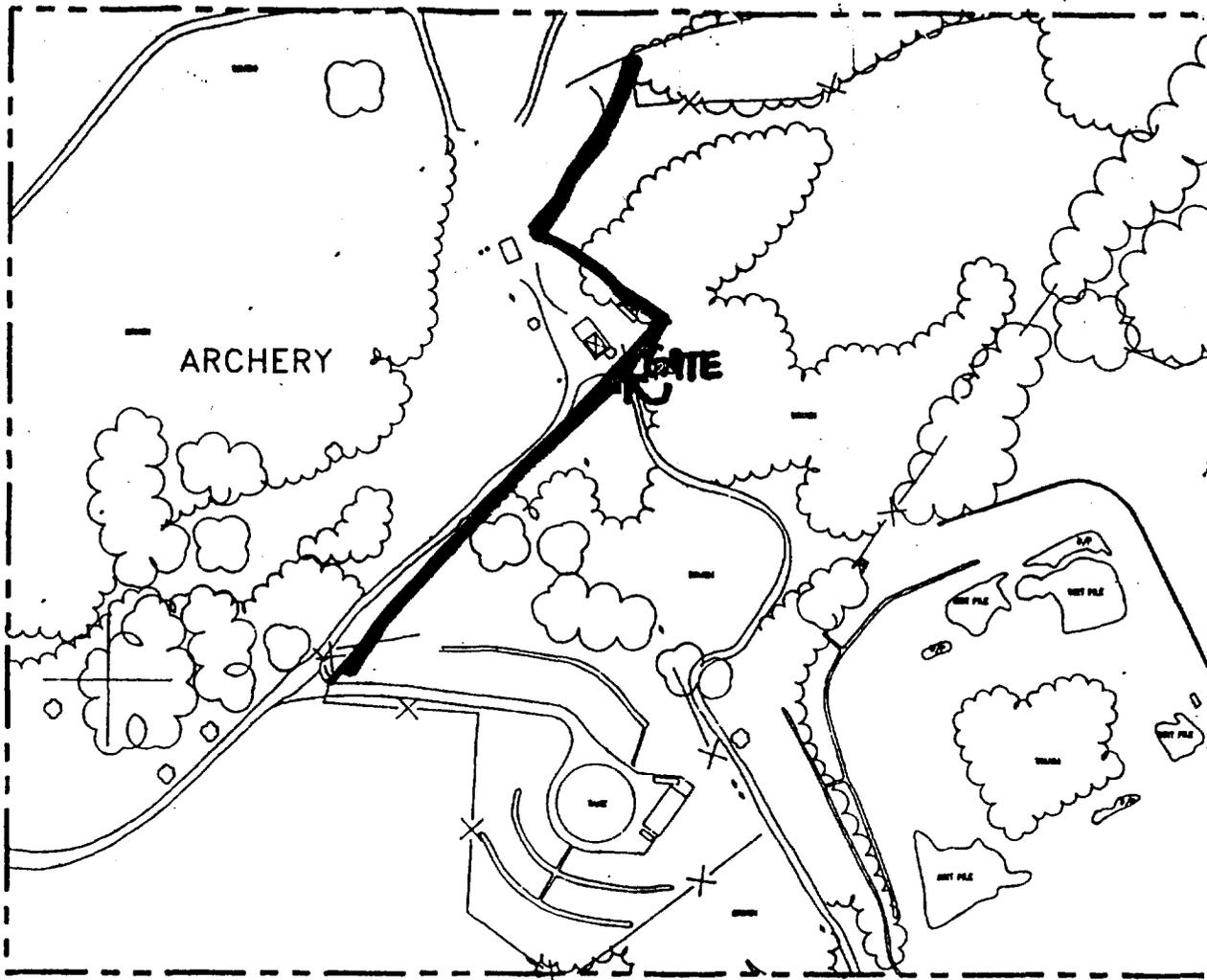
IRVINE

SITE PLAN--AREA 1
IRP SITE 2 & 17 FENCE
MCAS EL TORO, CALIFORNIA

PROJECT

OHM PROJECT No.

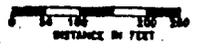
DRAWING



ARCHERY

GATE

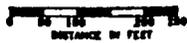
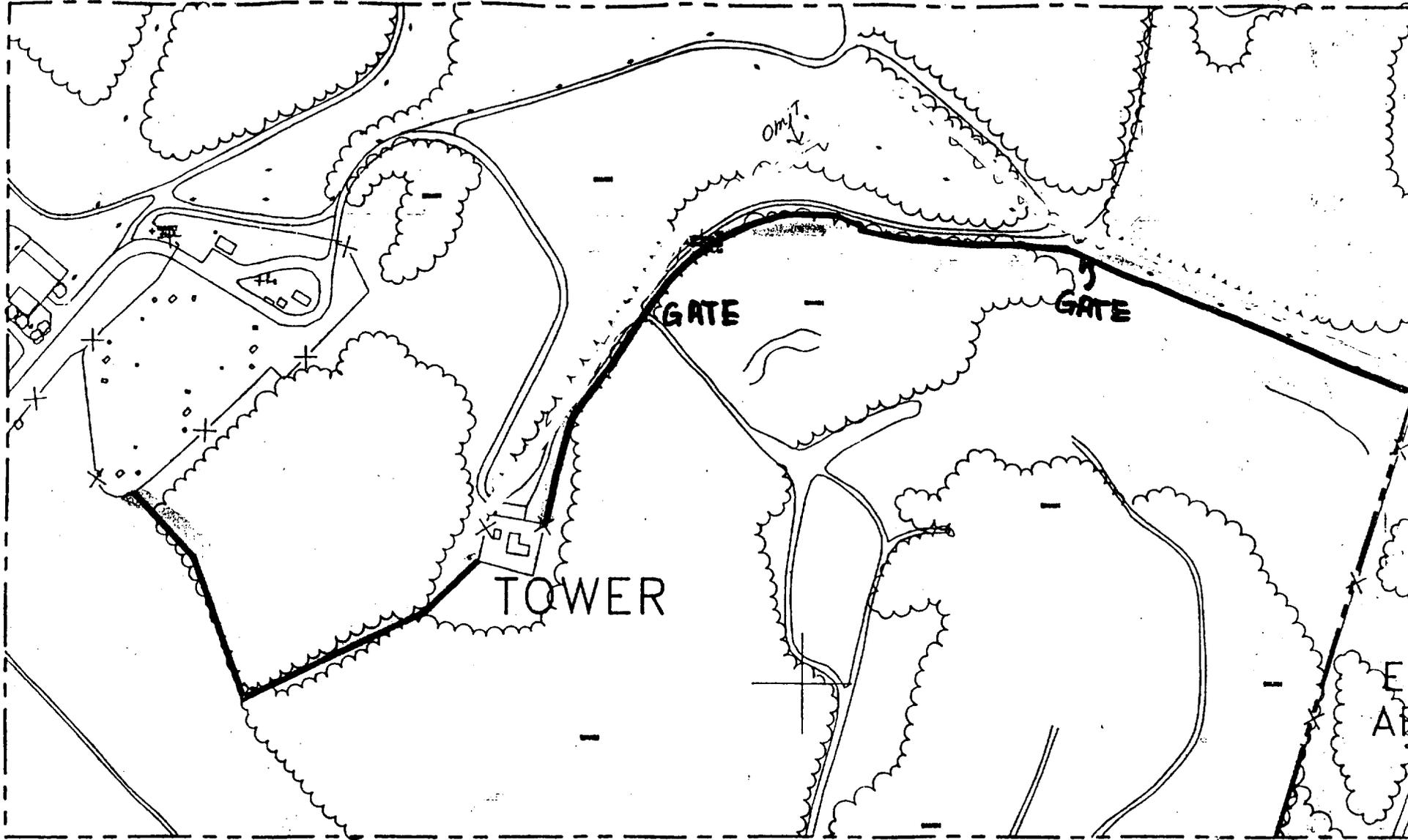
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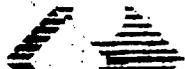
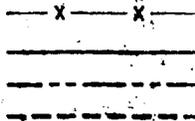
AREA 2

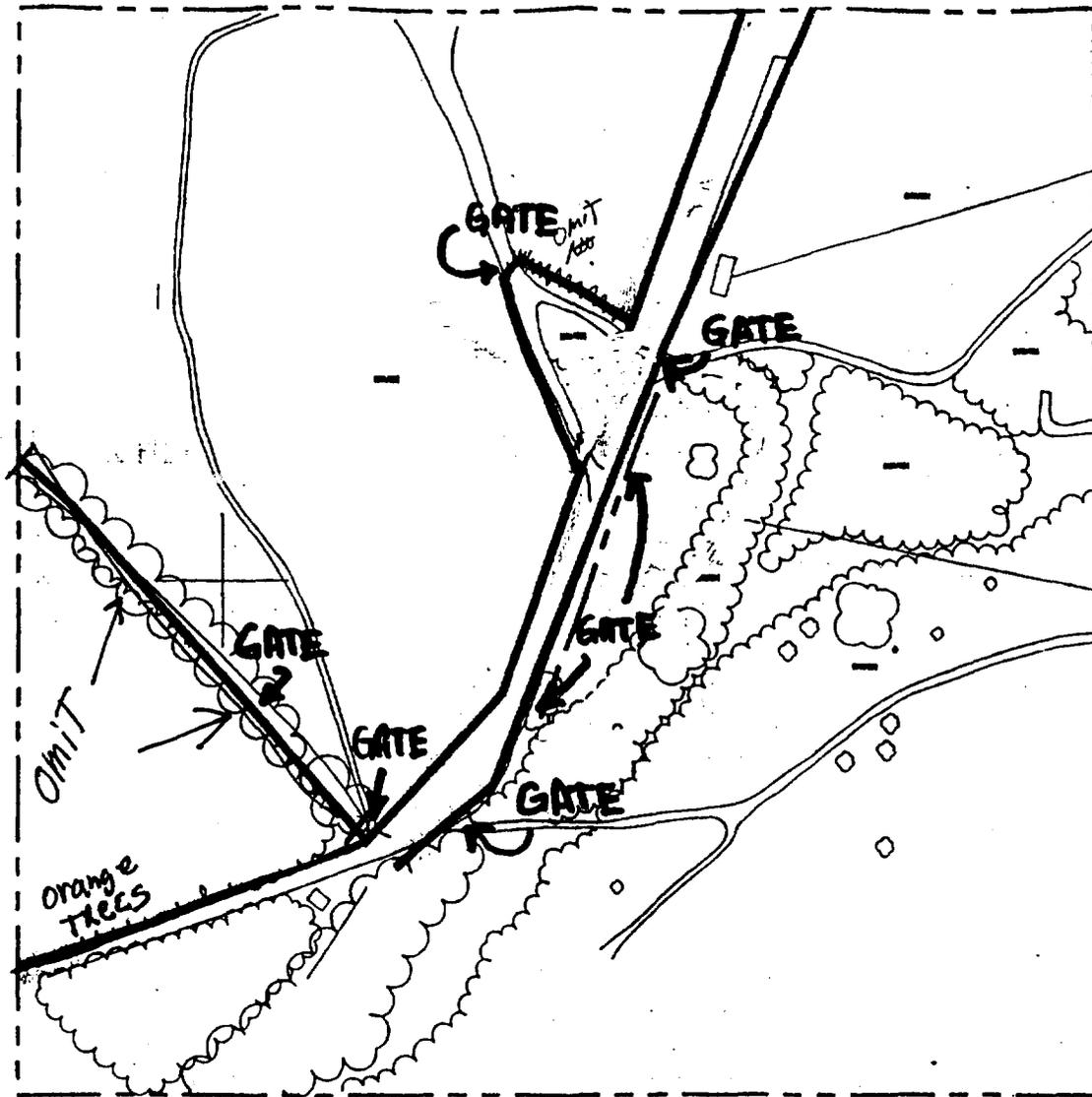




AREA 3

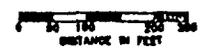
LEGEND:





OHM
OFFICE TRAIL
(24' x 60')

OHM
LAYDOWN AREA



LEGEND:
 --- X --- X --- EXISTING
 _____ OHM PROP
 - - - - - SPECIFIED

AREA OHM

