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MCAS EL TORO  
SSIC NO. 5090.3.A

February 14, 2007

Mr. Darren Newton  
BRAC Environmental Coordinator, MCAS El Toro  
7040 Trabuco Road  
Irvine, CA 92618

Dear Mr. Newton,

This letter serves as a comment for the public comment period of the Proposed Plan for Installation Restoration Program Operational Unit 2C, Sites 3 and 5. We would like to request that the alternative of clean closure (excavation and off-site disposal) be evaluated as an option for the selection of remedial alternatives at the two landfills. It was stated in the RAB presentation on January 31, 2007, that, during the 1997 Feasibility Study, excavation and off-site disposal was not economically feasible and was screened out. In the same presentation, it was also noted that, through subsequent investigations, the landfill boundaries and waste quantities were refined and reduced significantly. Based on this new information, we feel that the alternative of clean closure should be revisited to determine whether this method is still cost prohibitive. We have estimated the rough costs for clean closure, using the new volumes and the same assumptions that the Navy used in the Anomaly Area 3 Feasibility Study, and came up with the following remediation costs: Site 3- \$8.5-9.5 million, and Site 5- \$5.2-5.7 million.

Based on our analysis, it appears that excavation of the landfill is a viable alternative that falls within the cost ranges of the other alternatives and would satisfy all the Applicable or Relevant and Appropriate Requirements for Proposed Closure of Sites 3 and 5 landfills in a more environmentally friendly and timelier manner than what has been proposed. Excavation and clean closure of the landfills would benefit all interested parties and the community and better achieve the 'vision' and 'mission' statements of the Navy for the former MCAS El Toro that state *"the 'vision' is to expedite the restoration and reuse of the Former MCAS El Toro, and the 'mission' fast-track remediation of MCAS El Toro to promote reuse and protect human health and the environment by working cooperatively with the regulatory agencies, the community, and the stakeholders."*

Sincerely,

James P. Werkmeister, P.E.  
Manager, Environmental Affairs  
Lennar  
Heritage Fields

Glen Worthington  
Manager of Planning  
Orange County Great Park Corporation

received  
2/26/07