

February 3, 1995

RESPONSE TO NAVY COMMENTS ON CTO-047 REVISED DRAFT
COMMUNITY RELATIONS PLAN,
NAVAL TRAINING CENTER
Betty Schmucker, CTOL
Community Relations, Bechtel

COMMENT	RESPONSE
Comments from DTSC (Celeste Albanez):	
1. Page V, first paragraph, last sentence: "The purpose of the CRP is to address the concerns and interests of the community in the IR Program". The purpose of the CRP is to <u>identify the concerns</u> the community may have regarding the IR Program and to ask the community how they would like to be kept informed throughout the Program. Please change this sentence to reflect that the document identifies concerns and is a plan of action for the Navy to address.	Comment acknowledged and incorporated
2. Section 1.1 Overview and Organization, second sentence: "The IR Program was ... hazardous materials spills at Navy and Marine Corps activities." This does not make sense. The highlighted word should probably be facilities.	Comment acknowledged -- although the Navy uses the word "activity" to refer to its facilities, this term may not be clear to the public; therefore, the wording has been changed to "facilities"
3. Sentence #4: "The California Environmental Protection Agency (Cal-EPA) is the state oversight ...". Please change to read: The California Environmental Protection Agency (Cal-EPA), Department of Toxic Substances Control (DTSC) is the lead Regulatory Agency providing regulatory oversight for the Program.	Comment acknowledged and incorporated -- the wording, however, was changed slightly to avoid redundancy in using the word "regulatory" twice
4. Next sentence: "In addition to the soil and hydrogeologic investigations underway as part of the IR Program ..." Please delete this phrase and begin the sentence as "The Navy recognizes ..." The hydrogeologic investigations don't have anything to do with the Navy recognizing the importance of the community.	Comment acknowledged and incorporated

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| 5. Page 1-2, Section 1.2, second paragraph: "The goal ... give input to technical solutions to site problems." Please change this to read "the opportunity to comment and provide input throughout the IR Program". | Comment acknowledged and incorporated |
| 6. Page 2.2, Section 2.4, paragraph 2 last sentence: Please delete the word "technical". | Comment acknowledged and incorporated |
| 7. Page 4-1, Section 4.2, second sentence: We cannot assume anything so let's write and say something like "This plan is being written because of the change of the base's status from open to closed. Because of this change, this Plan is being written to reflect any changes in the community's interest and concern. | Comment acknowledged and incorporated -- two sentences were rewritten to reflect NTC's closure plans |
| 8. Page 4-2, second paragraph, third sentence: "Because participation was strictly voluntary, those who expressed reluctance, uncertainty or disinterest in being interviewed were not pursued." Please delete this sentence; it sounds like we only pursued who we wanted to pursue. Change the last sentence to read A total of 35 individuals were interviewed from the following groups:" | Comments acknowledged and incorporated |
| 9. Page 4-3, paragraph 4, last sentence: The way this sentence is written, it sounds like half of the interviewees felt that EHC does not represent the community as well as scaring the community and considering them zealots. Since only one person considered the EHC to be zealots, I recommend you shorten the sentence to read "The other half felt that EHC does not represent the community for various reasons." | Comment acknowledged and incorporated |
| 10. Page 4-4, third paragraph, second sentence: The last part of the sentence "wasting time out of fear" is not clear in that you would need to identify what the fear pertained to. I recommend deleting this phrase unless you can explain what the source of fear is. | Comment acknowledged and incorporated |
| 11. Page 5-3, Series of Newspaper Articles: Several interviewees mentioned the possibility of the Navy providing information to the community via newspaper articles. This recommendation should be strongly considered. I recommend that a formal process and schedule be established and disseminated to the RAB. | Comment acknowledged -- this section does describe how <i>The Beacon</i> , one of the most often-mentioned local papers, will be disseminating information on NTC |
| 12. Page 5-3, last paragraph: What is "FASW"? | Comment acknowledged; FASW is Fleet Anti-Submarine Warfare Training Center |

13. Page D-5: I am listed twice in this list. Please delete. Also delete Alvaro and add Alice.	Comment acknowledged and incorporated
14. Page E-2: This page in my copy was crooked. Please correct this in the final version of this document.	Comment acknowledged
15. Bechtel did an outstanding job in detailing and summarizing specific as well as the group concerns of the community. This was not an easy job, especially with a large number of interviewees. Overall, I was very pleased with the document.	Comment acknowledged

Comments from NTC Restoration Advisory Board:

A) General: The Draft Community Relations Plan as a “public relations” document is inadequate. The process of selecting the interviewees, conducting the interviews, and the analysis of their responses, both orally and written, from a “scientific” view point is questionable.

This document is in no way intended to be a “public relations” document, nor is that the purpose of EPA and DTSC community relations/public participation programs. Further, all appropriate state and federal guidance and regulations were followed in preparing this document, including the process of selecting interviewees, conducting the interviews, and analyzing responses, both orally and written, and none of it was or is ever considered to be “scientific”.

Specific:

B) Page 1-1, Section 1.1, para. 3: An explanation as why NTC is being treated as a CERCLA site would be appropriate.

Comment acknowledged; however, both the Executive Summary and Section 1 discuss CERCLA; in addition, a paragraph has been added on page 1-1 to explain the role of the UST Program and its relation to CERCLA at NTC

The following mechanical changes are probably being effected anyway, but to state the obvious:

C) Page 3-4, Site 2, last line: “ ... to be awarded in August 1994” is out of date and should be corrected.

Comment acknowledged and incorporated

D) Page 3-4, Site 3, line seven: This paragraph should be updated to reflect latest status of study.

Comment acknowledged and incorporated

E) Page 3-4, Site 4, 5, 6: Status of PA should be updated.

Comment acknowledged and incorporated

F) Page 3-4, Site 7, last line: Status of project to remove soil should be updated

Comment acknowledged and incorporated

G) Page 4-1, Section 4.1, para 1: To help those not familiar with San Diego geography, add a fourth sentence to the effect “Immediately to the east is San Diego International Airport, Lindbergh Field”.

Comment acknowledged; however, the geography of the NTC area was already presented in the introduction to Section 3 (page 3-1)

H) Page 4-1, Section 4.3: A more detailed description of the questionnaire and the interview process would assist in the review of this document.

Comment acknowledged; however, the questionnaire is included as Appendix A -- in addition, wording was added to indicate that both questionnaire and interviews were conducted in accordance with federal and state guidelines

I) Page 4-3, Section 4.4, para. 3, “Knowledge of Community ... Program/IR Sites”. RAB members expressed strong objection to the language used in this section which targets particular organizations. While the term “survey” is not specifically used, the document leaves a perception that the process used has a connotation of being scientific. There is no analytical conclusion to support the interpretation of the results. The RAB opposes the terms “zealots” and “vultures”. This terminology has no place in a document designed to enhance community relations. The RAB recommends this section be deleted or rewritten to reflect the results and titled “A Measure of Interview Opinion”.

Comment acknowledged and partially incorporated; “vultures” and “zealots” were actual words used by several interviewees to explain their feelings and perceptions about particular organizations, and this document fairly reflects those -- the wording, however, was changed (see Comment 9, above); see response to Comment A, above regarding “scientific”

J) Page 4-3, Section 4.4, para. 3, "Knowledge of Community ... Program/IR Sites", line 4, sentence [sic]. "... personal health problems she ..." change to read " personal health problems believed to be ..."

Comment acknowledged; the wording was changed to remain gender neutral

K) Appendix D: The order is confusing; I can't see the logic in the way contacts were sorted by name, title, or organization. It should be alphabetized.

Comment acknowledged and incorporated by organizing into groups rather than alphabetizing