

**RESPONSES TO RAB COMMENTS ON
DRAFT BRAC CLEANUP PLAN (BCP) UPDATE #2
Naval Training Center (NTC) San Diego**

1. **R. Cooper's COMMENT:** In the first paragraph on pages ES-1 and 1-1, mention is made of the "Base Closure and Realignment Act" -- I think this should read "Base Realignment and Closure" (BRAC).

Response: Although the acronym "BRAC" would suggest otherwise, the actual title of the law is indeed the "Base Closure and Realignment Act".

Charles B. Bishop's Comments:

2. **COMMENT. Page ES-3 & Section 3.5:** I do not recall any resolution of the concerns expressed by the RAB when the Community Relations Plan was discussed at the 25 October 1994 meeting. Ms. Albanez was to have briefed the RAB at the next meeting, but there is no record in my minutes. Please discuss with RAB.

Response: Most, if not all, comments were incorporated in the final document.

3. **COMMENT. Section 2.3.3:** What authorizes negotiated sale of NTC property to public agencies and excludes private bidder?

Response: Competitive public sale is also an option. See Section 2.3.7 on page 2-7. There are numerous laws and regulations which together create the process for property disposal. The DoD Base Reuse Implementation Manual, located in the Information Repository, lists the major laws and regulations.

4. **COMMENT. Section 3.4.1 & 3.4.8:** Does this mean that there are no areas in NTC where it is known that groundwater contamination does not exist? What is the plan to provide the information needed? Section 6.7 states that sampling will be done on a "site-by-site" basis, rather than areas. Will that satisfy the regulators?

Response: As POI evaluations, site investigations, and remedial actions are conducted at NTC, further information will be obtained regarding the potential for groundwater contamination from these source areas. As this information becomes available, the BCT, which includes regulatory personnel, will determine where best to sample groundwater on the installation to definitively identify areas of NTC that can be deemed eligible for transfer.

5. **COMMENT. Section 4.1.5 & 6.5.3:** These sections state that risk assessments will use residential exposure scenarios". Does that apply to the Landfill and to the areas inside the 65 db CNEL? If so, why?

Response: Section 6.5.3 of the BCP states that residential exposure scenarios will be used “in the absence of an identified land reuse option”. Therefore, for example, as it is expected that the golf course will likely remain a golf course, a residential scenario is not applicable for this area. Also, future residential use at the Inactive Landfill is highly unlikely, making the use of residential exposure scenarios inappropriate.

6. **COMMENT.** Chapter 5: This tells us that the cleanup program at NTC is scheduled to complete in time for the legislated turnover date, and that is based on “unconstrained” funding. Since there are indications from Washington that some funding constraints may occur, are fallback positions being prepared which match lower funding levels with priority cleanup actions?

Response: Cleanup is dependent on the receipt of appropriate funding. If the funding allocated NTC is not sufficient for the completion of cleanup activities, then properties will be leased for longer durations until such a time as funding becomes available and cleanup activities can be completed.

7. **COMMENT.** I note that \$22.5 million of taxpayer dollars are planned to be spent on the NTC cleanup program, of which \$18.5 are in the programs for FY-97 and -98. Before these commitments are made, I request assurance that the RAB will have the information needed to understand the problems, evaluate the risks and be able to justify these expenditures to the community. Please discuss this issue with the entire RAB.

Response: The cost information represents estimates only. The RAB will be provided further cost information in future.