



Fort Ord Environmental Justice Network, Inc.

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July 27, 2006

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Ms. Youngblood,

This letter is being submitted in response to the replies given in the Army's response to Fort Ord Environmental Justice Network's comments on the *Draft Final, Prescribed Burn Supplemental Report, Ranges 43-48, Former Fort Ord California*. Overall, these replies show a fundamental misunderstanding of the community's concerns and a disregard of their technical basis. The community's health concerns are portrayed as completely unfounded in a fashion that is not conducive to community involvement.

The basis for the Army's dismissal of these health concerns continues to be the wholly inadequate 2005 ATSDR Health Consultation. FOEJN and ESC have repeatedly noted the flaws in this ten page study. ATSDR flaws included but were not limited to a failure to review the pertinent literature, inadequacies in the Army's air sampling plan to evaluate conditions after the burn escaped their control, failure to determine the clinical response to the burn, lack of consideration for the well established health effects of smoke inhalation, and a failure to evaluate risks to sensitive populations. To date, neither ATSDR nor the Army have responded in any meaningful way that indicates that they have followed up on these concerns. One example of this is the conspicuous absence in this most recent response to the 2002 Leikauf paper reviewing the health effects of multiple respiratory irritants. Environmental Health Perspectives, the journal that the article was published in, is available for free online and thus readily accessible to anyone so there is no excuse for this paper to have not been reviewed in response to ESC's comments. A copy of the Leikauf paper is included with this letter. The Army must acknowledge that the public does not accept the conclusions of the 2003 ATSDR Health Consultation. If the Army continues to hold up the ATSDR report in response to ongoing health concerns regarding prescribed burns, trust within the community will continue to deteriorate regardless of the number of public meetings, workshops, or documents released that the Army provides.

The same comment that contained the reference to the 2002 Leikauf paper (Comment 3) also noted ESC and FOEJN's objection to the use of data from Los Angeles and Tokyo for comparative purposes. Both of these cities have long been noted for air quality issues. In its response, the Army does not address these concerns or the obvious problem of comparing data to those gathered at highly polluted locations. Instead, a section referring to the effects of acrolein by itself that does not consider its health effects in combination with other respiratory irritants is quoted.

ESC also disagrees with the Army's assertion in its response to Comment 3 that "stations within or directly adjacent to the burn area...did not represent locations where public receptors were present." When the fire escaped, it came within less than a quarter mile (well within spotting distance) from residential areas. The air monitoring plan in place at the time did not place any monitoring stations in these areas, so identifying other stations that experienced similar conditions is vital to assessing public health risks from the burn. The only stations that experienced similar conditions were directly adjacent to the original burn area, and as such should have been used to evaluate risk from the burn. ESC continues to maintain that this is the wrong approach to risk assessment at the site.

The Army's rationale for only monitoring PM₁₀ continues to be inadequate. The Army's response to Comment 5 fails to explain why PM₁₀ and PM_{2.5} cannot be monitored at the same time during future burns. "Comparability" can still be maintained if both are monitored. ESC and FOEJN continue to dispute that monitoring solely for PM₁₀ provides enough data to assess impacts from smoke. The Army and MBUAPCD's positions appear to overlook that the PM_{2.5} standards were developed because PM₁₀ standards alone were not deemed adequate to protect public health. This repeated dismissal of the scientific literature regarding respiratory irritants is neither acceptable nor appropriate at a cleanup site of this scale.

The Army does not appear to consider the community to be a substantial stakeholder in the cleanup of Fort Ord. This attitude is illustrated by the Army's response to Comment 4 in which ESC requested a cumulative risk assessment. The Army responded by noting the EPA had no further comments on the supplemental report in question. The absence of additional comments by the EPA is not a stance on the need for additional risk assessment or an endorsement for not performing one, and should not be portrayed as such. The rest of the Army's response does not provide a technical basis for refusing to conduct a cumulative risk assessment that includes PM₁₀, PM_{2.5}, acrolein, aluminum, dioxin, and other compounds detected during the burn. The TAG grant and regulations pertaining to community involvement during the cleanup process emphasize that the relationship between regulatory agencies and the public should be one of partnership, where decisions are made collaboratively. To date, the Army has shown no inclination to view the community in such fashion, particularly in regard to prescribed burns. This problem needs to be resolved as quickly as possible to maintain the integrity of the community involvement process.

No other issue at Fort Ord has generated as much interest as the proposed prescribed burns. The Army has not considered the public in all aspects of this issue, from its dismissal of the community's health concerns to the attempted discontinuation of the voluntary relocation plan. One way that the Army could potentially rebuild the public's trust in its efforts would be to halt all plans for additional burns and engage the public in a meaningful discussion regarding the options for vegetation clearance at Fort Ord. ESC and FOEJN have noted in our most recent comments on the MRS-16 that mechanical clearance of vegetation is more cost efficient than prescribed burning, which requires mechanical clearance of vegetation even after the burn. We look forward to these concerns being addressed in a meaningful way as soon as possible.

(signature page follows as page 3)

Sincerely,

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