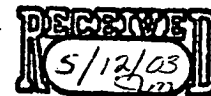


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May 6, 2003

**VIA TELECOPIER AND CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Ms. Sharon R. Cotner
FUSRAP Program Manager
U.S. Army Corps of Engineers
8945 Latty Avenue
Berkeley, MO 63134

Re: Request for Extension of Comment Period -- North County Feasibility Study and North County Proposed Plan

Dear Ms. Cotner:

On behalf of the General Investment Funds Real Estate Holding Company ("GIFREHC"), we request a 45-day extension of the public comment period (through July 14, 2003) respecting the North County Feasibility Study and North County Proposed Plan ("FS/PP") 68 Fed. Reg. 23290-91 (May 1, 2003). As you know, GIFREHC's subsidiary owns the Vicinity Property located immediately adjacent to the Hazelwood Interim Storage Site ("HISS"), which we understand to be the North County Vicinity Property perhaps most significantly impacted by MED/AEC materials. In addition, GIFREHC has allowed the Corps to construct a railroad spur across its property to remove the former HISS stockpiles, and which presumably will be used in connection with any remedial alternative selected involving excavation and out-of-state disposal of materials contaminated with MED/AEC wastes. For these reasons, GIFREHC will be directly and significantly impacted by whatever alternative the Corps selects at the close of the comment period, and GIFREHC intends to review the FS/PP and provide its comments to the Corps.

Given the highly technical and voluminous record associated with this action, the current 30-day period is insufficient to allow GIFREHC and others to retain the necessary outside expertise to develop and submit meaningful public comment. The FS and PP documents only summarize the results of the Government's 26-year effort, and together comprise nearly 900 pages of technical discussion and analysis. In addition, the FS and PP themselves are premised on both the thousands of pages of underlying site-specific technical studies and reports contained in the administrative record, as well as the equally voluminous guidance and policy documentation authoritatively cited in these decision documents. Moreover, in view of the 26 years of study already devoted to this effort by the Government, forestalling a final decision for another 45 days would represent only an insignificant postponement, would not prejudice human

Sharon R. Cotner

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health or the environment, and would result in more meaningful public input on these important but highly technical matters.

GIFREHC intends to review and provide comments on the FS and PP; however, the 30 days currently allotted for public review and input are insufficient for this purpose as a practical matter given (i) the extensive record supporting the FS and PP, and (ii) GIFREHC's (and perhaps others') need and intention to obtain the advice of outside radiological experts. We believe the Corps' own experience underscores this point. According to the St. Louis FUSRAP Sites Newsletters, drafts of the FS and PP were first distributed to EPA and MDNR for their comments in the fall of 2000 -- some two and half years ago -- and have been the subject of internal and inter-agency review, comment and revision cycles ever since. If the Government required more than two years of review and discussion to assure that these documents appropriately address all relevant issues, in our view, it would be unreasonable to expect that the public (who do not have ready access to the same technical expertise available to the Government) could review and provide meaningful comment on these documents in 30 days.

In light of (i) the potential impact and importance of the Corps' decisions on GIFREHC and other Vicinity Property owners in particular, and on the North County community generally; (ii) the practical impossibility of providing meaningful review and comment within the currently allotted time; (iii) the absence of any meaningful opportunity for judicial review after the decisions are made; and (iv) the negligible deferment involved; we respectfully request, on behalf of GIFREHC, that the Corps extend the comment period by 45 days to July 14, 2003.

Very truly yours,


James G. Votaw

cc: John Katkish
Jeffrey J. Davidson

*** TX REPORT ***

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Date: May 6, 2003

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