

Interim Land Use Control Implementation Plan Update
Track 2 Bureau of Land Management Area B and
Munitions Response Site 16
Former Fort Ord, California

Final
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Interim Land Use Control Implementation Plan Update Track 2 Bureau of Land Management Area B and Munitions Response Site 16 Former Fort Ord, California

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1 INTRODUCTION

The former Fort Ord was placed on the National Priorities List (NPL) of Superfund sites by U.S. Environmental Protection Agency (EPA) on February 21, 1990. The former Fort Ord was selected in 1991 for Base Realignment and Closure (BRAC) and the base was officially closed in September 1994. *Record of Decision (ROD) for the Track 2 Bureau of Land Management (BLM) Area B and Munitions Response Site (MRS) 16, Former Fort Ord, California* (BLM Area B and MRS-16 ROD; U.S. Department of the Army [Army], 2017), addresses munitions and explosives of concern (MEC; e.g., unexploded ordnance [UXO], discarded military munitions [DMM]) that potentially remain in the BLM Area B and MRS-16 at the former Fort Ord. The selected remedy includes Land Use Controls (LUCs) as part of the remedy (Figure 1). Following the ROD signature, the Army developed *Final Interim Land Use Control Implementation Plan, Track 2 Bureau of Land Management Area B and Munitions Response Site 16, Former Fort Ord, California* (2017 Interim LUCIP; KEMRON, 2017c) to describe the procedures for the Army to implement the LUCs required by the ROD during the interim period while remedial action (removal of MEC) was underway in portions of BLM Area B. The 2017 Interim LUCIP was written in accordance with the *Institutional Controls: A Guide to Preparing Institutional Control Implementation and Assurance Plans at Contaminated Sites* (EPA, 2012) and supplements *Final Work Plan, Remedial Design (RD)/Remedial Action (RA) Track 2 BLM Area B and MRS-16, Former Fort Ord, California* (KEMRON, 2017a).

The BLM Area B and MRS-16 ROD required remedial actions to be conducted in BLM Area B sub-areas B-2A and B-3 (Figure 2). The remedial action consists of surface MEC removal in the sub-areas, and subsurface MEC removal in selected areas such as trails and roads. The remedial action was initiated in May 2017 in accordance with *Final Site-Specific Work Plan, Munitions and Explosives of Concern Remedial Action, BLM Area B, Former Fort Ord, California* (SSWP; KEMRON, 2017b). As of March 2020, all remedial actions are complete with the exception of Unit A. Remedial actions so far completed will be documented in a remedial action report. The completed remedial actions support the use of the BLM trail network as shown in Figure 3.

The prescribed burn planned for Unit A in 2018 was not conducted due to lack of days meeting prescribed conditions. In early 2019, Fort Ord BRAC received funding guidance which reduced funding for Fort Ord Military Munitions Response Program (MMRP) starting in 2019 and affecting multiple years. The munitions response contract in effect at the time was due to expire in March 2020. A decision was made not to conduct a prescribed burn in Unit A in 2019 and suspend munitions cleanup in Unit A in order that all other remedial actions would be completed under the contract. The remedial action will resume as soon as funding is made available and a new munitions response contract can be awarded. Fort Ord BRAC will continue to submit through its established budget channels a funds request that adequately addresses the completion of the remaining response actions.

This update to the 2017 Interim LUCIP describes how Fort Ord BRAC Office will implement the LUCs during the period of reduction in project personnel starting in April 2020. In the absence of a munitions response contract, the most significant change is that tasks requiring UXO-qualified personnel will be managed by U.S. Army Corps of Engineers (USACE) Ordnance and Explosives Safety Specialist (OESS) assigned to Fort Ord, supplemented by additional qualified personnel as arranged by USACE. Implementation actions will be coordinated with BLM, the current and future landowner.

Approximately 790 acres of BLM Area B property was included in the 1996 transfer of portions of Fort Ord to BLM. The Army plans to transfer the remainder of BLM Area B and MRS-16

property to BLM following completion of the remainder of the remedial action (Unit A). The interim LUCIP will be reviewed and updated as appropriate when the remedial actions identified for BLM Area B are completed. It is anticipated that portions of the LUC implementation actions may be transferred to another party (e.g., BLM) in the future. Anticipated long-term implementation and maintenance of the LUCs is described in Table 3 and will be further evaluated at the time of remedial action completion.

1.1 Definition of Land Use Controls

The term LUC means any restriction or administrative action, including engineering and institutional controls, arising from the need to reduce risk to human health and the environment.

The Department of Defense (DoD) defines LUCs as follows:

Physical, legal, or administrative mechanisms that restrict the use of, or limit access to, real property, to manage risks to human health and the environment. Physical mechanisms encompass a variety of engineered remedies to contain or reduce contamination, or physical barriers to limit access to real property, such as fences or signs. (DoD, 2019)

The BLM Area B and MRS-16 ROD identified the following LUCs for the property:

- Public education. Such education will be based upon the Army's Recognize, Retreat, Report (3Rs) Explosives Safety Education Program and include the provision of 3Rs educational materials in brochures and at kiosks, and presented during public presentations and safety briefings. It will also encourage people to adhere to access management guidelines and may include trail markings, signage or other engineering controls, where warranted;
- Munitions recognition and safety training for people who conduct ground-disturbing or intrusive activities;
- The provision of construction support by UXO-qualified personnel for ground-disturbing or intrusive activities; and
- Prohibition against uses of the property that are inconsistent with the Habitat Management Plan (HMP), including but not limited to residential, school, and commercial/industrial development.

1.2 Responsibilities

The Army Fort Ord BRAC will implement the LUCs described in the BLM Area B and MRS-16 ROD. Under Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Army is ultimately responsible for the implementation, maintenance, enforcement, and reporting of remedial LUCs, although all or part of such responsibilities may be transferred to another party (e.g., BLM, current and future property owner), with the approval of EPA and in consultation with Department of Toxic Substances Control (DTSC). LUCs will be maintained until the Army, EPA, and DTSC concur that the site is protective of human health and the environment from the explosives safety risks posed by MEC that may remain present without a need for LUCs.

Responsible organizations and points of contact are identified in Table 1.

2 SITE DETAILS

The Army transferred majority of the property within BLM Area B to BLM in 1996 as a habitat reserve. The remainder of BLM Area B and MRS-16 is planned for future transfer to BLM. In 2012, current and future BLM lands at the former Fort Ord, including BLM Area B and MRS-16, were designated as the Fort Ord National Monument. Current and future BLM parcels at the former Fort Ord are shown on Figure 3.

Designated development and habitat reserve areas are identified in the *Installation-Wide Multispecies Habitat Management Plan for Former Fort Ord* (HMP; USACE, 1997) and associated updates and revisions. The HMP, as modified or updated, describes special management measures and habitat monitoring requirements for species of concern within the habitat reserve and development areas that apply to the Army's environmental cleanup actions as well as future land management uses. The Army's environmental cleanup actions are also subject to the Biological Opinion issued by U.S. Fish and Wildlife Service (USFWS) to protect the special-status natural resources (USFWS, 2017). Management guidelines for transferred properties, outlined in the HMP for the Natural Resource Management Area (NRMA), including BLM Area B and MRS-16, comprise habitat restoration, enhancement and monitoring, access control, prescribed burning, and an allowance for development-oriented use in as much as two percent of the area. In addition, BLM has identified recreational access on established routes to be an important component of the current and future uses of the Fort Ord public lands managed by BLM.

The areas included in BLM Area B are currently open to public access for recreational use of established trails and roads. The current BLM trail network is shown in Figure 3.

2.1 Site Description

The former Fort Ord, EPA identification number CA 7210020676, is located near Monterey Bay in northwestern Monterey County, California, approximately 80 miles south of San Francisco (Figure 1). The former Army base consists of approximately 28,000 acres of land next to Monterey Bay and the cities of Seaside, Sand City, Monterey, and Del Rey Oaks to the south and Marina to the north. State Route 1 passes through the western portion of former Fort Ord, separating the beachfront from the rest of the base. Laguna Seca Recreation Area, Toro Park, and Highway 68 border former Fort Ord to the south and southeast, respectively, as well as several small communities such as Toro Park Estates and San Benancio.

Since 1917, military units (e.g., cavalry, field artillery, and infantry) used portions of the former Fort Ord for training (e.g., maneuvers, live-fire) and other purposes. Because the military conducted munitions-related activities (e.g., live-fire training) on the facility, MEC may be present on parts of the former Fort Ord. The types of military munitions used at the former Fort Ord included: artillery and mortar projectiles, rockets, rifle and hand grenades, practice land mines, pyrotechnics, bombs, and demolition materials. For the purposes of the Fort Ord Military Munitions Response Program (MMRP) being conducted, MEC does not include small arms ammunition.

BLM Area B is 1,597 acres that includes several MRSs and areas located in-between identified MRSs. The Army conducted munitions responses (e.g., investigation, removal) at identified MRSs prior to the development of *Final, Revision 2, Track 2 Munitions Response Remedial Investigation /Feasibility Study, BLM Area B and MRS-16, Former Fort Ord, California* (BLM Area B and MRS-16 RI/FS; Gilbane, 2015). The results of the munitions responses indicated the historical uses to have included various live-fire close combat and weapons training, as well as bivouac and maneuver training. Data about the type of military munitions used and relative risk at each MRS were used to support the BLM Area B and MRS-16 RI/FS (Gilbane, 2015). To evaluate the potential presence of MEC, BLM Area B was subdivided into eight sub-areas (Figure 2) based on

historic training uses and the quality, types, and depths to which previous munitions responses were conducted in each area.

MRS-16 consists of approximately 81 acres along the southern boundary of BLM Area B (Figure 2). MRS-16 was initially identified as a World War II era rocket range and as a “bazooka practice” area. The site was later used for a portion of time as an anti-armor training area. The Army completed an interim remedial action that included subsurface removal of munitions at MRS-16. The results of the interim remedial action was incorporated into the BLM Area B and MRS-16 RI/FS.

More detailed description of BLM Area B sub-areas and MRS-16 can be found in the BLM Area B and MRS-16 ROD (Army, 2017).

2.2 Summary of Response Actions

The BLM Area B and MRS-16 RI/FS evaluated the historical uses as well as the results of the munitions responses previously conducted in the sites. Based on the RI/FS, the ROD for BLM Area B and MRS-16 required remedial actions to be conducted in portions of BLM Area B (sub-areas B-2A and B-3). As of March 2020, all remedial actions are complete with the exception of Unit A.

2.2.1 Risk Exposure Pathways

Based on the RI/FS and the completed remedial actions, it is not likely that people traversing on the roads and trails (those that are authorized for public use) would encounter a MEC item. The response actions selected in the ROD support the reuse of the property as a habitat reserve, including: habitat enhancement; habitat monitoring and educational programs; route, road, and trail management and maintenance; and recreational access on established routes. The presence of MEC in BLM Area B and MRS-16 does not appear to be a concern in terms of explosive safety risks to ecological receptors (Army, 2017).

2.2.2 Response Action Summary

Munitions responses were conducted in portions of BLM Area B and MRS-16 prior to the development of the BLM Area B and MRS-16 RI/FS. Limited evidence of MEC was found during previous investigations in BLM Area B sub-areas B-1, B-2 and B-3A. While there is a possibility that MEC remain present in vegetated areas away from the roads and trails, it was considered unlikely. Surface and/or subsurface removals were conducted in MRS-16 and BLM Area B sub-areas B-4, B-5, and B-6, significantly reducing the potential for encounter with MEC. The selected remedy for MRS-16 and BLM Area B sub-areas B-1, B-2, B-3A, B-4, B-5 and B-6 is Alternative 2 – LUCs (Figure 2).

Available data from previous investigations indicated the possibility for MEC to remain present in BLM Area B sub-areas B-2A and B-3 in vegetated areas away from the roads and trails. The selected remedy for BLM Area B sub-areas B-2A and B-3 is Alternative 3 – Technology-Aided Surface Removal, with Subsurface Removal in Selected Areas, and LUCs (Figure 2). The remedial action was initiated in May 2017 in accordance with the SSWP. As of March 2020, all remedial actions are complete with the exception of Unit A. Remedial actions completed so far completed will be documented in a remedial action report.

The remedial actions that have been completed included some areas outside of sub-areas B-2A and B-3 due to configurations of prescribed burn units. It should be noted that even after conducting remedial actions, uncertainty remains regarding the potential presence of MEC (subsurface) and associated exposures; therefore, LUCs are included in the selected remedies. Remedial action within Unit A is not complete; therefore, there is a potential for MEC to be present on the surface, away from the trails and roads. More complete information on the remedial actions

will be documented in a remedial action report.

Since the ROD signature in May 2017, Fort Ord BRAC Office has implemented the LUCs within BLM Area B and MRS-16. Implemented actions have been reported to the regulatory agencies annually as required by the 2017 Interim LUCIP.

2.2.3 Cleanup Objectives

The primary remedial action objective (RAO) for BLM Area B and MRS-16 is to support the designated use of the property as a habitat reserve as described in the HMP with public access as part of the Fort Ord National Monument. Based on years of site experience, the potential presence of MEC in BLM Area B and MRS-16 does not appear to be a concern in terms of explosive safety risks to ecological receptors, therefore, risks to plants and animals from explosive hazards are not addressed in the ROD.

Based on this RAO, the Army intends to (a) complete the remedial actions to address the potential presence of MEC, and (b) incorporate institutional controls (i.e., LUCs) as part of the remedy to manage risks from MEC that may remain present.

2.2.4 LUC Components Identified in the Decision Document

Response actions have been conducted, and will be completed to further reduce the potential for MEC to be present. However, uncertainty remains regarding the potential presence of MEC (subsurface) and associated exposures. Therefore, LUCs are included in the selected remedies. LUCs will support safe reuse activities as part of the Fort Ord National Monument managed by BLM (e.g., habitat monitoring, invasive species control, prescribed burning, associated fire management activities, and public access).

The following LUC components were identified in the ROD for the entirety of BLM Area B and MRS-16: public education, munitions recognition and safety training, construction support, and prohibition against uses inconsistent with the HMP. These LUC components are discussed in further detail in Section 3.0.

2.3 Current and Reasonably Anticipated Future Land Use

The *Fort Ord Base Reuse Plan* (Fort Ord Reuse Authority [FORA], 1997) identified land use categories for the former Fort Ord. The categories included development of public, commercial, and residential areas and open space, recreation, and habitat management. Designated development and habitat reserve areas are also identified in the HMP (USACE, 1997). The *Assessment, East Garrison and Parker Flats Land Use Modifications* (Zander and Associates [Zander], 2002) and the Revised Attachment A – HMP map (April, 2005) present the revised boundaries of the habitat reserve areas. The HMP, as modified or updated, describes special land use restrictions and habitat monitoring requirements for target species within the habitat reserve and development areas that apply to Army's environmental cleanup actions and land management under future uses. Post-disposal (after the Army transfers the property) management guidelines are outlined in the HMP for the NRMA, which includes BLM Area B and MRS-16. The management guidelines include habitat restoration, enhancement and monitoring, access control, prescribed burning, and an allowance for development-oriented use in as much as two percent of the area. In addition, BLM has identified recreational access (non-motorized) on established routes to be an important component of the current and future uses of BLM-managed public lands at the former Fort Ord.

In 2012, current and future BLM lands at the former Fort Ord, including BLM Area B and MRS-16, were designated as the Fort Ord National Monument. Presidential Proclamation 8803 states, "The protection of the Fort Ord area will maintain its historical and cultural significance, attract tourists and recreationalists from near and far, and enhance its unique natural resources, for the

enjoyment of all Americans.” In addition, the proclamation safeguards the use of the Fort Ord National Monument by stating that “All Federal lands and interests in lands within the boundaries of this monument are hereby appropriated and withdrawn from all forms of entry, location, selection, sale, leasing, or other disposition under the public lands laws, including withdrawal from location, entry, and patent under the mining laws, and from disposition under all laws relating to mineral and geothermal leasing other than by exchange that furthers the protective purposes of the monument” (The White House, 2012).

The majority of the property within BLM Area B was transferred to BLM in 1996 as a habitat reserve as described in a Memorandum of Understanding (Army, 1995) and a Letter of Transfer from the Army to the Department of the Interior (Army, 1996). Established trails and roads in BLM Area B are currently accessible to the public for recreational use. The current trail network, which reflects the results of the completed remedial actions, is shown in Figure 3. The Army and BLM have and will continue to coordinate actions to promote the 3Rs explosives safety (e.g., use of signage, notices, reports of munitions encounters, and munitions recognition and safety training). Reporting of suspected munitions items discovered on federal property is implemented according to the procedure described in *Munitions Response Site (MRS) Security Program, Former Fort Ord, California* (Army, 2016).

2.4 Property Ownership Information

MRS-16 is located within parcel F1.3. BLM Area B is located within portions of parcels F1.1.1, F1.2, and F1.3 (Figure 4). The LUCs apply only to those parcel portions on which BLM Area B and MRS-16 lie. Parcels F1.1.1 and F1.2 were transferred to BLM in 1996 as described in a Memorandum of Understanding (Army, 1995) and a Letter of Transfer from the Army to the Department of the Interior (Army, 1996). Parcel F1.3 has not yet been transferred and is currently held by the Army. Table 2 provides the parcel ownership, acreage, and the acreage of each parcel where LUCs apply.

2.5 Related Site Management Information

The MRS Security Program (Army, 2016) and periodic updates provide information about site security measures implemented and maintained at various MRSs within the former Fort Ord. The program is modified as necessary due to changes in the nearby human populations or to reflect the status of munitions responses. The MRS Security Program includes procedures for: providing munitions recognition and safety training; handling reports of incidental munitions encounters on federal property; reporting trespassing incidents; community relations related to site security; and periodic program review by the MRS Security Committee. The LUC implementation actions will utilize relevant existing processes established under the MRS Security Program.

Within the Fort Ord National Monument, BLM enforces its public use rules. Among the rules is that recreational access is allowed only on trails and roads that are signed open. The rules are posted on BLM kiosks, BLM website, and through BLM outreach materials. Law enforcement on transferred BLM properties is provided by BLM. For Parcel F1.3, Fort Ord BRAC has adopted the same public use rules that BLM has established for the rest of the National Monument. U.S. Army Garrison Presidio of Monterey (POM) Police Department (POMPD) provides law enforcement on Fort Ord BRAC property.

As of February 2020, all trails within BLM Area B that have been subjected to temporary closures due to remedial action have been reopened. To supplement the emphasis on recreational user compliance with the trail use rules, in Unit A in particular, additional signs were installed at Unit A perimeters and at trailheads. The signs give clear notice to recreational users that recreational access is allowed only on trails and roads that are signed open. In coordination with BLM, Fort Ord

BRAC will monitor public access in Unit A. If any unauthorized activity is detected, Fort Ord BRAC will work with BLM and implement appropriate action to improve compliance with public access rules. If appropriate, law enforcement will be notified.

California Department of Forestry and Fire Protection (CalFire) provides fire protection services on the BLM Fort Ord property. In 2019, Fort Ord BRAC provided updated information to BLM (and CalFire) regarding restrictions that apply to wildfire responses on BLM property in BLM Area B. Unit A was identified as “potential surface munitions area” where horizontal exclusion zone would apply in an event of a wildfire. Vertical exclusion zones were discontinued based on a new recommendation by USACE (further information is provided in Appendix A). Fire management and suppression activities may be conducted on designated fuel break roads and 15 feet on either side of the road (approximately 45 feet in width), and other areas where subsurface removal has been conducted. Other than Unit A “potential surface munitions area”, UXO escort is not required for surface access. U.S. Army Garrison POM Fire Department (POMFD) provides fire protection on Fort Ord BRAC property. The Army recognizes that prescribed burning and wildfire response are part of the current and future uses of this property. To facilitate these activities to occur in a safe manner, additional safety information is provided in Appendix A.

Other site management actions include tasks such as road maintenance within Army-owned portions of BLM Area B and MRS-16. Until the remaining remedial actions are completed, the Army will maintain those roads for safe vehicle travel by project staff, BLM, and emergency services.

3 LUC IMPLEMENTATION STRATEGIES

The following LUC components were selected as part of the remedy:

- Public education. Such education will be based upon the Army's 3Rs Explosives Safety Education Program and include the provision of 3Rs educational materials in brochures and at kiosks, and presented during public presentations and safety briefings. It will also encourage people to adhere to access management guidelines and may include trail markings, signage or other engineering controls (physical measures), where warranted;
- Munitions recognition and safety training for people who conduct ground-disturbing or intrusive activities;
- Provision of construction support by UXO-qualified personnel for ground-disturbing or intrusive activities; and
- The prohibition against uses of the property that are inconsistent with the HMP, including but not limited to residential, school, and commercial/industrial development.

This document describes Fort Ord BRAC's implementation actions. It is anticipated that portions of the LUC implementation actions may be transferred to another party (e.g. BLM) in the future. The interim LUCIP will be reviewed and updated as appropriate when the remaining remedial actions are completed. Anticipated long-term implementation and maintenance of the LUCs are provided in Table 3 and will be further evaluated at the time of remedial action completion.

3.1 Public Education

Public education measures will inform people who use the land (e.g., recreational users) about the historical military training uses of the areas, response actions conducted, the potential for MEC to be present, and actions to take should they encounter a suspected munitions item. Public education measures will be consistent with the Army's 3Rs of Explosives Safety Education Program (recognize, retreat, and report). Public education measures include the provision of 3Rs explosives safety education materials in brochures and at kiosks; and presented during public presentations and safety briefings. It will also encourage people to adhere to access management guidelines and may include trail markings, signage or other physical measures, where warranted.

For BLM Area B and MRS-16, the following public education measures may be applicable:

- Public education through established or new kiosks to provide information regarding the history and status of cleanup actions in BLM Area B and MRS-16.
- Publication of a brochure that describes the military's previous use of the property and the access management guidelines (e.g., staying on designated trails or roads, no camping, and no digging) for recreational users including actions to take if a suspected munitions item is encountered.
- Physical measures (e.g., signs and trail markings) that encourage adherence to access management guidelines.

3.1.1 Performance Objectives

The performance objectives for the public education LUC are: (a) to ensure that public land users are informed of the potential for MEC to be present and actions that should be taken if a suspected munitions item is encountered and (b) to ensure that public land users report discovery of suspected MEC items to local law enforcement.

3.1.2 Implementation

The following public education actions are being implemented by Fort Ord BRAC:

- Factsheet “The Superfund Process for Track 2 BLM Area B and MRS-16”: This factsheet provides a background on the historical military training uses of the areas, response actions conducted, the potential for MEC to be present, and actions to take should a suspected munitions item be encountered. It includes the Army’s 3Rs of explosives safety. It contains a message to encourage recreational users to stay on designated roads and trails. This factsheet has been distributed at the project kickoff community information meeting on May 23, 2017 and made available on www.fortordcleanup.com website. The factsheet was subsequently updated to also inform users that unauthorized ground disturbance is prohibited. The factsheet will continue to be distributed at community information events such as Community Involvement Workshops.
- “Frequently Asked Questions, Munitions Cleanup: Fort Ord National Monument (Northern Portion)”: This factsheet provides information about temporary road and trail closures associated with the remedial action and how the information will be communicated. It informs about the potential for MEC to be present and actions to take should a suspected munitions item be encountered, and includes the Army’s 3Rs of explosives safety. It contains a message to encourage recreational users to stay on designated roads and trails. The factsheet also informs users that construction support is a requirement for any ground disturbing or intrusive activities within BLM Area B and MRS-16. It was initially developed in May 2017 and has been updated over time to reflect the progress of the remedial action. This factsheet is available on www.fortordcleanup.com website. Hardcopies are made available in the kiosks installed at the start of the remedial action. The factsheet will be updated as necessary and continue to be distributed via the kiosks and at community information events such as Community Involvement Workshops.
- Kiosks: In coordination with BLM several information kiosks were installed in May 2017 at frequently-used recreational access points surrounding BLM Area B and MRS-16. The locations are identified in Figure 5. Information posted on these kiosks include the potential for MEC to be present, and actions to take should a suspected munitions item be encountered. It includes the Army’s 3Rs of explosives safety. It contains a message to encourage recreational users to stay on designated roads and trails. During the remedial actions in 2017-2019, information about temporary road and trail closures were prioritized. These kiosks will continue to be used to inform the land users of the status of the remedial action and associated public access information. Once all remedial actions are complete, it is anticipated some of the kiosks will continue to be used to provide public education material including information about the completed remedial action. Fort Ord BRAC Office coordinates the contents with BLM.
- Physical Measures: During the remedial actions in 2017-2019, signs and other physical access management measures were focused on supporting the remedial action in BLM Area B. As field work in remedial action units were completed, the associated temporary fencing and signs were removed. Trails within the remedial action units that have been approved by the EPA and DTSC for recreational uses were reopened for public access.

In October 2019, Fort Ord BRAC coordinated the revised security measures for Unit A with BLM, EPA and DTSC. New signs were installed at Unit A perimeters and at trailheads to give clear notice to recreational users that recreational access is allowed only on trails and roads that are signed open. Unit A trails were reopened in February 2020 for public use after the installation of these signs. The signs will be maintained until

the remaining remedial action in Unit A resumes.

- Website www.fortordcleanup.com: The “Munitions” page was updated in May 2017 to provide a background on the historical military training uses of the areas, response actions conducted, and the potential for MEC to be present. The “Munitions Safety” page provides the Army’s 3Rs of explosives safety; the availability of munitions recognition and safety training; and procedures for reporting incidental munitions encounters. Fort Ord Munitions Incident Recording Form is available on this web page (a copy is provided as Attachment 3). The “BLM Area B (Northern Portion of the National Monument)” website was developed in May 2017 to provide timely information about temporary trail closures related to the remedial action in BLM Area B. The website will continue to be used to inform the land users of the status of the remedial action and associated public access information.
- Community information events: Public education content has been provided at events such as the Community Involvement Workshop, and will be provided at future outreach events.

Public education materials, content, and distribution will be updated based on periodic reviews and in coordination with BLM. Activities will be summarized in the LUC Annual Report Form, described in Section 4.2.1.

Clarifications made based on past implementation efforts include:

- In 2017, the two-strand barbed wire fence delineating the Saturated Area within MRS-16 was replaced with 4-foot tall white poles to better communicate the intent of the delineation with BLM.

3.2 Munitions Recognition and Safety Training

Personnel involved in conducting ground-disturbing or intrusive activities will be required to attend munitions recognition and safety training to increase their awareness of and ability to recognize a potential munition. Prior to planned intrusive activities, BLM will be required to arrange for the munitions recognition and safety training to be provided to workers who will perform ground-disturbing or intrusive activities.

3.2.1 Performance Objectives

The performance objectives are: (a) to ensure that land users involved in ground-disturbing or intrusive activities are educated about the possibility of encountering MEC, and (b) to ensure that land users involved in ground-disturbing or intrusive activities stop the activity when encountering suspected MEC and report to the appropriate authority.

3.2.2 Implementation

The Army offers munitions recognition and safety training to identified property owners, lessees, contractors, municipal service providers, resource conservation workers, and anyone involved in intrusive activities on the former Fort Ord or property that has been transferred as described in the MRS Security Program (Army, 2016). A copy of the “Military Munitions Recognition and Safety Training and How to Request a Free Safety Training Class” flier is provided as Attachment 4. This training includes recognizing potential munitions that might be found during planned actions in a project area, the safety and notification procedures to follow if something is found, and the distribution and explanation of “Safety Alert” brochures. Fort Ord BRAC Office will maintain a record of training provided. Activities will be summarized in the LUC Annual Report Form, described in Section 4.2.1.

Clarifications made based on past implementation efforts include:

- The required frequency of the training was clarified as annual. Training received during the previous 12 months is acceptable.
- Trained BLM staff may provide 3Rs briefing to activity participants under his/her control (e.g., volunteer projects as part of public lands day). Documentation will be per the MRS Security Program.
- Fort Ord BRAC will provide the munitions recognition and safety training to BLM staff as part of the annual BLM safety week presentation or an alternative format requested by BLM.

3.3 Construction Support

Construction support must be requested during a project's planning stages prior to the start of intrusive activities. Planned ground-disturbing or intrusive activities will be assessed for the appropriate level of support.

If the probability of encountering MEC is assessed to be low, on-call construction support will be required. UXO-qualified personnel will be available to assist during ground-disturbance or intrusive activities. If evidence of a munition is encountered during such activities, the activity will cease. The standard process on Federal land is to request support of an explosives or munitions emergency from an explosive ordnance disposal (EOD) unit who will be dispatched to evaluate and remove the item. Within BLM Area B and MRS-16, UXO-qualified personnel will be available to provide an initial assessment of a munition encountered to determine whether EOD support is required.

If the Army determines that the probability of encountering MEC during a planned activity is assessed to be moderate or high, onsite construction support consistent with the Department of Defense Explosive Safety Board (DDESB) standard will be required.

The DDESB standard and related definitions are described in Defense Explosives Safety Regulation (DESR) 6055.09, Edition 1, January 13, 2019. Definitions of key terms are provided in Attachment 2.

3.3.1 Performance Objectives

The performance objective for the construction support LUC is to ensure projects involving ground-disturbing or intrusive activities are coordinated with UXO-qualified personnel, so that discoveries of potential MEC items will be handled appropriately.

3.3.2 Implementation

Fort Ord BRAC Office will provide construction support for ground-disturbing or intrusive activities within BLM Area B and MRS-16 that are authorized by BLM and/or Fort Ord BRAC. Construction support will be provided in a manner consistent with DDESB requirements by qualified personnel meeting the DESR 6055.09 Edition 1 requirements. Fort Ord BRAC and BLM will use the ground-disturbing or intrusive activity information form (Attachment 5) as a planning and communication/information tool to track and coordinate planned activities.

The types of ground-disturbing or intrusive activities could vary from minor intrusion as part of BLM's routine maintenance activities, to projects that necessitate more extensive advance planning. Fort Ord BRAC Office will assess each project for the probability of encountering MEC based on site-specific data, including historical records and/or onsite investigation data, and the planned activities. The remedial actions selected by the ROD are designed to support the current and future uses of the underlying property as a habitat reserve with recreational access on

designated roads and trails. Is it anticipated that most future ground-disturbing projects will be of nature and locations that would be supported with on-call construction support or anomaly avoidance.

General guidance in Department of the Army Pamphlet (DA PAM) 385-64 provides that a “low probability” determination may be assigned to those areas for which a search of available historical records and/or on-site investigation data indicates that, given the military munitions-related activities that occurred at the site, the likelihood of encountering MEC is low. Munitions-related activities that may merit a “low” determination include, but are not limited to, the former use of the area for live-fire training exclusively with small arms ammunition; for maneuver training, to include maneuver training involving the use of smokes, pyrotechnics and simulators; as firing points; for munitions inspection, handling, storage or transfers, to include residue points and inert storage yards; for air defense; or as munitions operating facilities in which the processes used did not result in the generation of concentrations of munitions constituents high enough to present an explosive hazard. Areas on which previous responses have been completed may also qualify for “low” determination. A “moderate to high [probability]” determination may be assigned to those areas for which a search of available historical records and/or on-site investigation data indicates that, given the military or munitions-related activities that occurred at the site, there is more than a low probability that MEC is present.

Starting in 2020 tasks requiring UXO-qualified personnel will be managed by USACE OESS assigned to Fort Ord, supplemented by additional qualified personnel as arranged by USACE. Until a new munitions response contract is awarded, Fort Ord BRAC will maintain the capability to provide on-call construction support and anomaly avoidance. Projects that require (or are likely to require) onsite detonations will be delayed until resources for appropriate level of support is available. The general steps for construction support is described below.

- BLM shall inform Fort Ord BRAC Office of planned ground-disturbing or intrusive activities at least six months in advance of the planned start of the project, or as soon as practicable. For routine maintenance activities in subsurface removal areas, BLM shall inform Fort Ord BRAC 30 days in advance or as soon as practicable. BLM shall inform the Army of BLM projects and any other project that it authorizes to occur on BLM properties within BLM Area B and MRS-16. BLM will use the intrusive activity information form (Attachment 5). Army-authorized projects (other than the remedial action) within Army properties within BLM Area B and MRS-16 will be handled in a similar manner.
- Fort Ord BRAC Office will assess the probability of encountering MEC based on site-specific data, including historical records and/or onsite investigation data, and the planned activities.
- Fort Ord BRAC Office will coordinate with BLM and provide an appropriate level of support for the planned activities. Construction support or anomaly avoidance shall be provided in a manner consistent with DDESB requirements by qualified personnel. A UXO-qualified personnel will be assigned to the project.
- The assigned UXO-qualified personnel will provide on-call construction support or anomaly avoidance.
 - On-call construction support: When a suspected munitions item is encountered the ground-disturbing activity will stop. The UXO-qualified personnel will provide an initial assessment of the found item. If the item poses no explosive hazard, the activity may resume. If the item potentially poses and explosive hazard, Fort Ord BRAC Office will request the support of an explosives or munitions emergency (military EOD or local bomb squad with equivalent training). The activities in the immediate vicinity of the suspect item will not recommence until

the response is complete and the status of the suspect item is known. When the project is completed Fort Ord BRAC Office will develop a report on construction support provided.

- Anomaly avoidance: A UXO-qualified personnel will be assigned to provide anomaly avoidance. When a suspected munitions item is encountered the activity will be relocated to another area. The suspect item will be handled as an incidental munition per the MRS Security Program protocol.
- If MEC are encountered during construction support, Fort Ord BRAC Office will notify EPA and DTSC as soon as practicable.
- If MEC are encountered during on-call construction support, Fort Ord BRAC Office will reassess the probability of encountering MEC for the area. If the reassessment confirms that there is a low probability of encountering MEC, the ground-disturbing activity can resume. If the reassessment finds that there is a moderate to high probability of encountering MEC, the level of construction support will be modified to meet the needs of the project.
- Onsite construction support requires an ability to address the explosives safety hazard before construction activity starts. Development of a work plan and DDESB approval of a safety submission are also required. Until a new munitions response contract is obtained, projects that require (or are likely to require) onsite detonations will be delayed until resources for appropriate level of support is available.

Activities will be summarized in the LUC Annual Report Form, described in Section 4.2.1.

Clarifications made based on past implementation efforts include:

- For goat use in the Lookout Ridge area (sub-area B-6), the required level of support is on-call construction support.
- For weed abatement in Picnic Canyon area (MRS-12) (sub-area B-5), the required level of support is on-call construction support.
- For aircraft use during fire events, minimum drop height is no longer applicable to prescribed burning or wildfire response.
- For entry into ponds for wetland monitoring in the Machine Gun Flats area (MRS-10A/10B) (sub-area B-4), UXO escort is not required.
- For entry into ponds for wetland monitoring in the Mudhen Lake (MRS-21) (sub-area B-5), on-call construction support is required.
- Fort Ord BRAC will provide training about the munitions-related restrictions and communications procedures to BLM staff as part of the annual BLM safety week presentation.
- Results of ground-disturbing activities conducted under each ground-disturbing activity information form will be summarized in annual LUC reports.
- Results of on-call construction support provided by the munitions response contract (which ended in March 2020) will be documented.
- If no incidental munitions encounter occurred during the first phase of a project, the coordination effort for repeat (subsequent) visits to the same area may be simplified.

- Biological surveys in several vernal ponds within BLM Area B, where subsurface anomaly investigation was conducted in 2018, may occur without construction support or anomaly avoidance (KEMRON, 2019).
- While unlikely, it is possible that munitions with sensitive fuzes or unknown filler could be encountered. An incidental encounter with such munitions or suspected munitions should only be handled by a DoD EOD unit.

3.4 Prohibition Against Inconsistent Uses

Uses of the property that are inconsistent with the HMP (e.g., residential, school, and commercial/industrial development) are prohibited.

The intent of this LUC is to ensure that the property will not be converted from the current designated use (habitat reserve) to development uses that are incompatible with the selected remedy. All of the activities and uses envisioned in the HMP for this property, including the allowance for 2% of the habitat reserve for development-oriented uses, which could include employee housing/barracks area, are part of the current designated use, and are allowed to occur, so long as they comply with the requirement for munitions recognition and safety training and construction support that apply to ground-disturbing or intrusive activities.

3.4.1 Performance Objectives

The performance objective is to ensure that the restriction remain in place until they are changed with the concurrence of the Army and EPA in consultation with DTSC.

3.4.2 Implementation

The Army will place the prohibition against inconsistent uses in a property transfer document (e.g., letter of transfer). The property transfer document will include the following land use activity restrictions:

- Prohibit unauthorized public access;
- Prohibit ground-disturbing or intrusive activities outside of specified areas, unless construction support is provided by UXO-qualified personnel; and
- Prohibit uses of the property that are inconsistent with the HMP (e.g., residential, school, and commercial/industrial development).

Ground-disturbing activities off of designated trails and roads are prohibited unless coordinated with BLM and Fort Ord BRAC Office.

The 1996 Letter of Transfer includes a provision that requires that BLM's management of the property will be guided by the Biological Opinion and the HMP. BLM's current management of the property is consistent with the Biological Opinion and the HMP. The property transfer document that will transfer the remaining lands to BLM will be prepared following the completion of the remedial action. The land use restrictions applicable to BLM Area B and MRS-16 will be instituted at that time.

Clarifications made based on past implementation efforts include:

- Specific use restriction language will be developed to better communicate the LUCs with land users and BLM.

4 LUC MAINTENANCE ELEMENTS

LUC maintenance activities, such as monitoring and reporting, help ensure that LUCs are in place and functioning as intended at the site so that response actions remain protective. Long Term Management Measures that will be implemented for BLM Area B and MRS-16 include a land transfer document that outlines any land use restrictions, annual monitoring and reporting, and five-year review reporting.

4.1 Property Interest and Resource Ownership

The Army will provide a property transfer document that: (a) informs BLM of the selected remedy, including land use or activity restrictions; (b) describes the munitions responses conducted on the property; (c) outlines appropriate procedures to be followed should suspected MEC be encountered; and (d) establishes BLM's obligations to maintain and enforce the land use and activity restrictions selected as part of the remedy. The Army previously transferred portions of BLM Area B to the Department of Interior, BLM, as documented in a Letter of Transfer dated 18 October 1996 (Army, 1996). The subsequent property transfer document will reiterate the information specified in the 1996 Letter of Transfer and establish the land use restrictions for the property within BLM Area B and MRS-16 regarding the risks associated with MEC that may remain present.

The property transfer document will establish the appropriate restrictions for transferred property within BLM Area B and MRS-16 regarding potential MEC risks and will indicate that:

- Specified reuses designated and approved at the time the Army transfers the property must be maintained by BLM; and
- Potential risks from MEC that may remain may significantly increase if changes are made to the designated and approved uses.

The Army will provide notice to EPA and DTSC as early as six months in advance but no later than 60 days prior to the transfer of the remaining BLM Area B and MRS-16 property to BLM to provide an opportunity for EPA and DTSC to be involved in discussions to ensure that appropriate provisions are included in the transfer terms to maintain the ROD-required land use restrictions. The Army will provide a copy of executed transfer document to EPA and DTSC.

4.2 LUC Assurance Monitoring and Reporting

LUC assurance monitoring is designed to help evaluate whether LUC instruments remain in place, operate in the manner envisioned during response action selection, and continue to be effective.

4.2.1 Annual Monitoring and Reporting

Fort Ord BRAC Office will collect information about and report on each MEC encounter that is unrelated to active remedial action activities and changes in site conditions that could increase the possibility of encountering MEC. Fort Ord BRAC manages incidental munitions encounters through the incidental munitions reporting process in the MRS Security Program. If a reported item in BLM Area B and MRS-16 is identified as MEC, Fort Ord BRAC Office will notify EPA and DTSC as soon as practicable.

Fort Ord BRAC will report results of the annual monitoring to EPA and DTSC on a yearly basis by 30 April of each year. Annual monitoring shall include the following activities:

- Document review. Records of public education, munitions recognition and safety

training, and construction support actions will be reviewed. Records of reports of munitions encounters will be reviewed.

- Site inspection. Information kiosks and any physical measures in use will be inspected to ensure they remain intact and undamaged.
- Interviews. Appropriate personnel from BRAC and BLM will be interviewed to collect their observations and feedback on the LUC implementation and maintenance actions; to identify possible changes for process improvement; and to identify any changes in site conditions that could increase the probability of encountering MEC.

Annual monitoring results will be summarized and reported using the LUC Annual Report Form provided at Attachment 6.

If, as a result of these periodic reviews, the Army proposes a modification of the remedy, the Army will submit the proposal to EPA and DTSC under the Federal Facility Agreement (FFA) (see Section 6).

4.2.2 Five-Year Review

The Army will conduct five-year reviews, under CERCLA Section 121(c) and the Fort Ord FFA, as part of the Fort Ord five-year review process. The five-year review will evaluate the protectiveness of the selected remedies. The next five-year review will occur in 2022.

At the time of each five-year review, the Army or Army's representatives will assess the status of the public education measures, munitions recognition and safety training program, construction support program, and prohibited land uses measures, and document any recommendations or modifications to the program as described in Section 6.

5 LUC ENFORCEMENT ELEMENTS

If the Army identifies any activity that is inconsistent with the specific LUC objectives, use restrictions, or any activity that may interfere with the effectiveness of the LUCs, the Army will notify EPA, DTSC, and BLM as quickly as possible, and no later than 10 days, after discovery of any inconsistent activity. The Army will work together with BLM, EPA, and DTSC to determine a plan of action to rectify the situation.

6 LUC MODIFICATION AND TERMINATION ELEMENTS

If the remedy is determined to be no longer effective or if site conditions change over time, it may be necessary to modify the LUCs through the CERCLA process. Changes to the LUCs will be made in consultation with BLM, EPA, and DTSC. Such changes will be documented in an updated LUCIP.

LUCs will be maintained until the Army, EPA, and DTSC concur that the site is protective of human health and the environment from the explosives safety risks posed by MEC that may remain present without a need for LUCs. This decision will be based on:

- Post-remediation site evaluation incorporating new information (e.g., geophysical mapping); or
- Where removal to depth has adequately addressed the potential of MEC remaining in the subsurface.

7 REFERENCES

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- Army, 1996. *Letter of Transfer, A Portion of Former Fort Ord from the Department of the Army to the Department of the Interior, Bureau of Land Management*. [OE-0152]
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- The White House, 2012. *Presidential Proclamation – Establishment of the Fort Ord National Monument*.
- Zander Associates (Zander), 2002. *Assessment, East Garrison - Parker Flats Land Use Modifications, Fort Ord, California*. May. [AR# BW-2180]

Tables

Table 1. Responsible Organizations and Points of Contact

| Organization | Point of Contact |
|---|---|
| Department of the Army | William K. Collins BRAC Environmental Coordinator Fort Ord BRAC Office P.O. Box 5008 Monterey, California 93944-5008 Phone: (831) 393-1284 FAX: (831) 393-9188 email: William.K.Collins.civ@mail.mil |
| Bureau of Land Management | Eric Morgan Fort Ord National Monument Manager BLM Central Coast Field Office 940 2nd Avenue Marina, CA 93933-6009 Phone: (831) 582-2200 email: EMorgan@blm.gov |
| U.S. Environmental Protection Agency, Region IX | Maeve Clancy Remedial Project Manager Superfund Federal Facilities Cleanup Branch 75 Hawthorne Street, Mail Code SFD-8-3 San Francisco, California 94105 Phone: 415-947-4105 email: Clancy.Maeve@epa.gov |
| California EPA Department of Toxic Substances Control, Region 2 | Brett Leary Project Manager Military and Corrective Action Unit Site Mitigation and Restoration Program Department of Toxic Substances Control 8800 Cal Center Drive Sacramento, California 95826 Phone: (916) 255-4988 email: Brett.Leary@dtsc.ca.gov |

Table 2. Parcel Information

| Parcel Number | Current Property Owner | Parcel Acreage | Acreage under LUCs |
|----------------------|-------------------------------|-----------------------|---------------------------|
| F1.1.1 | BLM | 4,943.31 | 489.1 |
| F1.2 | BLM | 1,191.20 | 300.76 |
| F1.3 | Army | 806.74 | 806.74 |

Table 3. Near- and Long-Term LUC Implementation

| Land Use Control | Description | Near-Term Implementation | Anticipated Long-Term Implementation* |
|---|---|--|---|
| Public Education | Includes the provision of 3Rs explosives safety education materials in brochures and at kiosks; and presented during public presentations and safety briefings; encouragement for users to adhere to access management guidelines and may include trail markings, signage or other engineering controls, where warranted. | <p>Army</p> <p>The BRAC Fort Ord will supply the Army's 3Rs Explosives Safety Education Program and include the provision of 3Rs educational materials in brochures and at kiosks, and presented during public presentations and safety briefings.</p> <p>The BRAC Fort Ord will provide to BLM the public education materials used prior to transfer.</p> <p>The BRAC Fort Ord will install and maintain physical measures as needed (e.g., Unit A signs).</p> | <p>BLM</p> <p>BLM will review the public education materials for any required updates on an annual basis. BLM will present the public education materials during public presentations and safety briefings.</p> |
| Munitions Recognition and Safety Training | People involved in conducting ground- disturbing or intrusive activities will be required to attend munitions recognition and safety training to increase their awareness of and ability to recognize items prior to initiating intrusive activities. | <p>Army</p> <p>The BRAC Fort Ord will coordinate with USACE to provide munitions recognition and safety training to people who conduct ground-disturbing or intrusive activities that are authorized by BLM and/or the Army.</p> | <p>BLM</p> <p>The UXO-qualified personnel assigned to BLM will provide munitions recognition and safety training to people who conduct ground-disturbing or intrusive activities that are authorized by BLM and/or the Army.</p> |

| | | | |
|--|--|--|--|
| Construction Support | Construction support will be provided during ground- disturbing or intrusive activities. | <p>Army</p> <p>The BRAC Fort Ord, USACE, and BLM will coordinate ground-disturbing or intrusive projects. The BRAC Fort Ord will determine the appropriate level of construction support.</p> <p>The USACE OESS or alternative qualified personnel will perform construction support.</p> | <p>BLM</p> <p>The UXO-qualified personnel assigned to BLM will perform on-call construction support and anomaly avoidance.</p> <p>Army</p> <p>A process for onsite construction support will be developed.</p> |
| Prohibition Against Uses Inconsistent with the HMP | Prohibit uses inconsistent with the HMP (e.g., residential, school, and commercial/ industrial development). | <p>Army/BLM</p> <p>BLM will manage the property in a manner consistent with HMP.</p> <p>The Army will specify restrictions/conditions in the property transfer document(s).</p> | <p>BLM</p> <p>BLM will manage the property in a manner consistent with HMP and any restrictions/conditions specified in the property transfer document(s).</p> |

| Long-Term Management Measures | Description | Near-Term Implementation | Anticipated Long-Term Implementation* |
|--|---|---|--|
| Reports of incidental munitions encounters | Recording and responding to reports of incidental munitions encounters. | Army Incidental munitions encounters are reported to BRAC Fort Ord per the process described in MRS Security Program. USACE or alternative qualified personnel will be available to provide an initial assessment of a munition encountered to determine if it is safe to remove. If the item potentially presents an explosive hazard, military EOD (or local bomb squad with equivalent training) will be contacted for response. | BLM/Army The UXO-qualified personnel assigned to BLM will be available to provide an initial assessment of a munition encountered to determine if it is safe to remove. If the item potentially presents an explosive hazard, the Army will request support of an explosives or munitions emergency (e.g., an EOD unit). |
| Annual Reporting | Conduct annual LUC monitoring and reporting. Monitoring will include document review, site inspection, and interviews. Monitoring results will be summarized in LUC Annual Report Form to be submitted to EPA and DTSC. | Army The BRAC Fort Ord will conduct annual monitoring and prepare the LUC Annual Report Form. | BLM BLM will conduct annual monitoring and prepare the LUC Annual Report Form. |
| Five-year review reporting | The Army will conduct five-year reviews as part of the Fort Ord five-year review process. | Army The Army will conduct five-year reviews until no longer necessary. | BLM BLM will participate in the five-year review process. Army The Army will conduct five-year reviews until no longer necessary. |

* It is anticipated that portions of the LUC implementation actions may be transferred to another party (e.g., BLM) in the future. Anticipated long-term implementation will be further evaluated. The LUCIP will be updated when the remedial action identified for portions of BLM Area B are completed.

Figures

Figure 1
BLM Area B and MRS-16
Location Map
 (from OE-0907B)

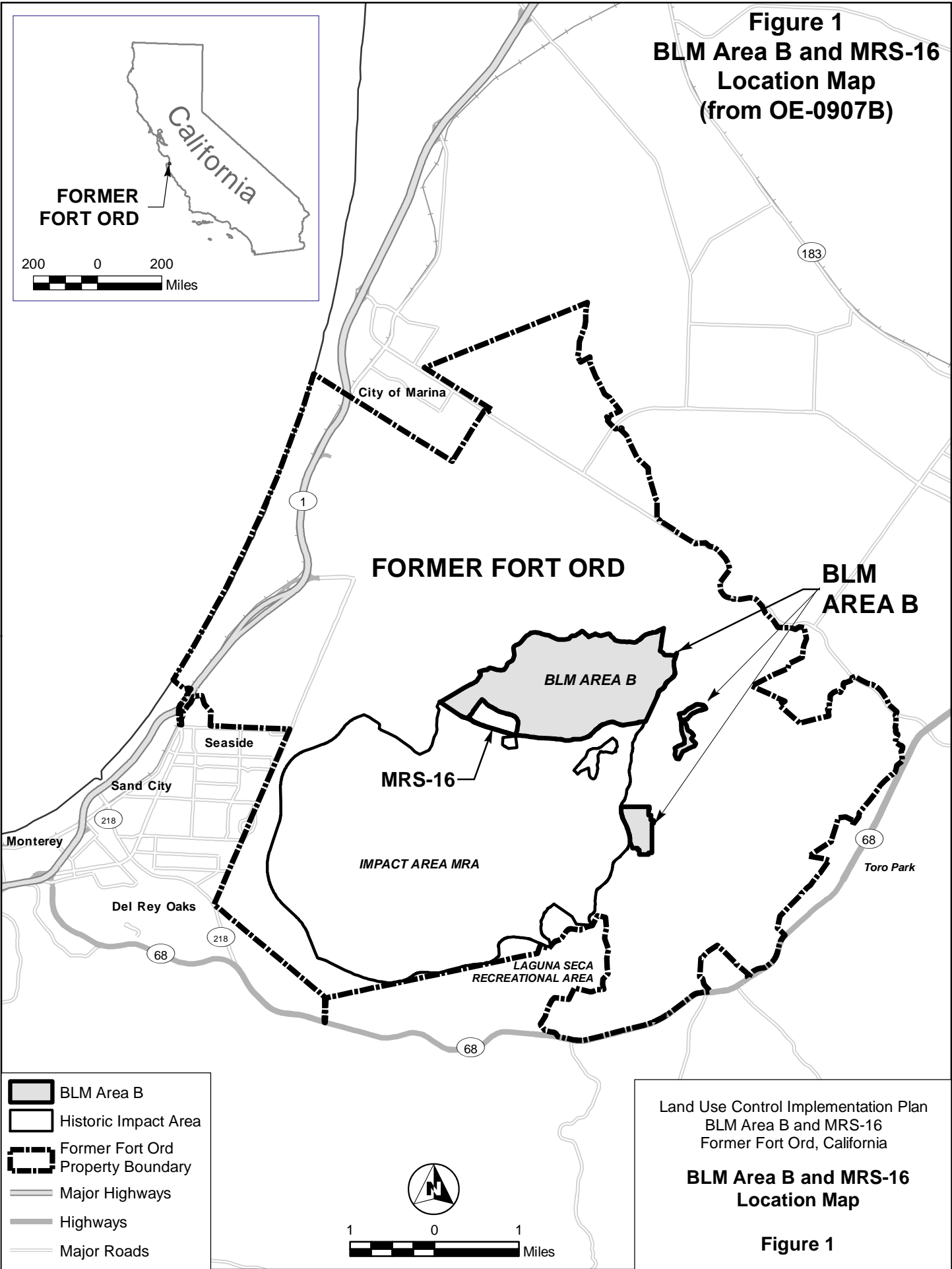
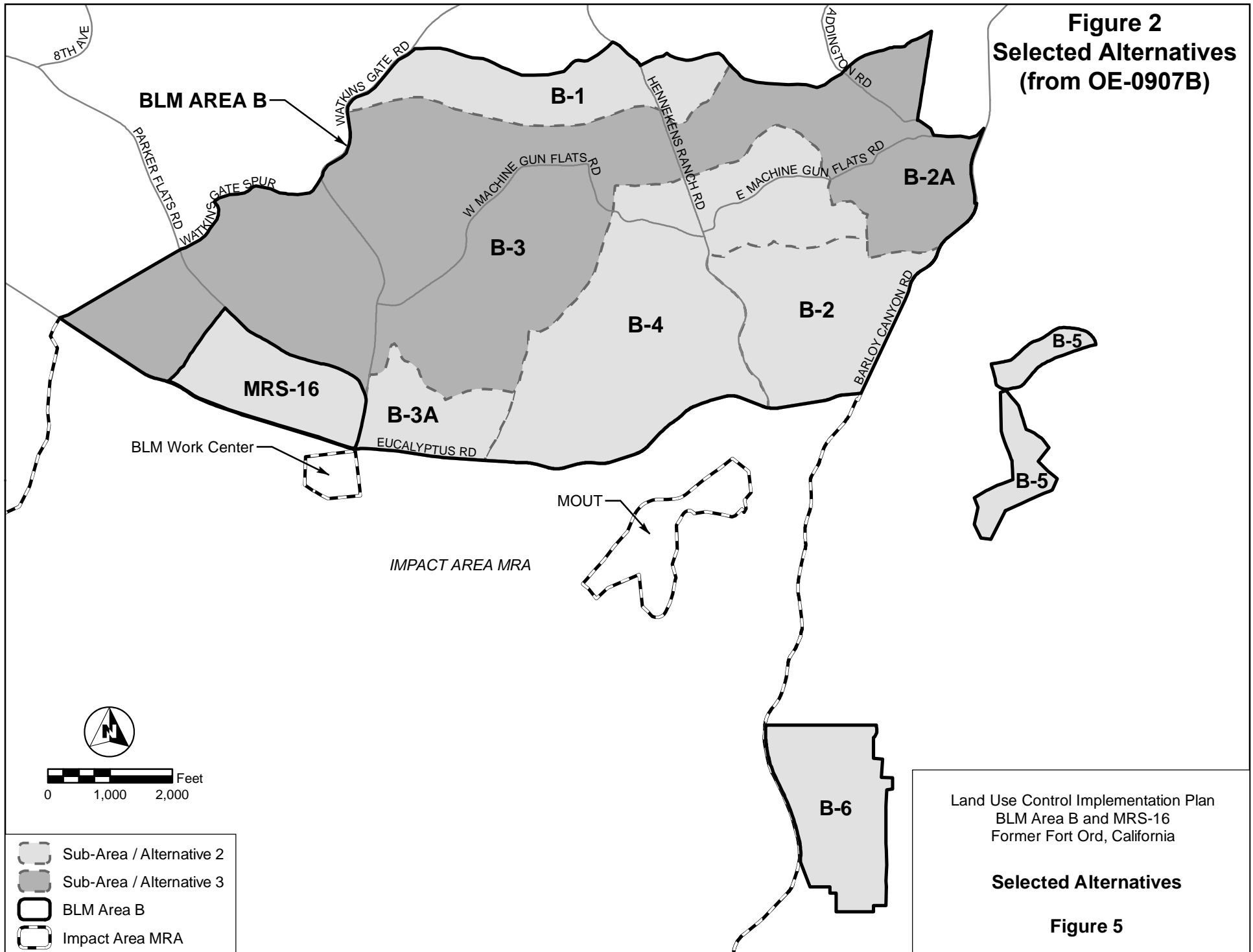


Figure 2
Selected Alternatives
 (from OE-0907B)



Land Use Control Implementation Plan
 BLM Area B and MRS-16
 Former Fort Ord, California

Selected Alternatives

Figure 5

Figure 3
BLM Trail Network

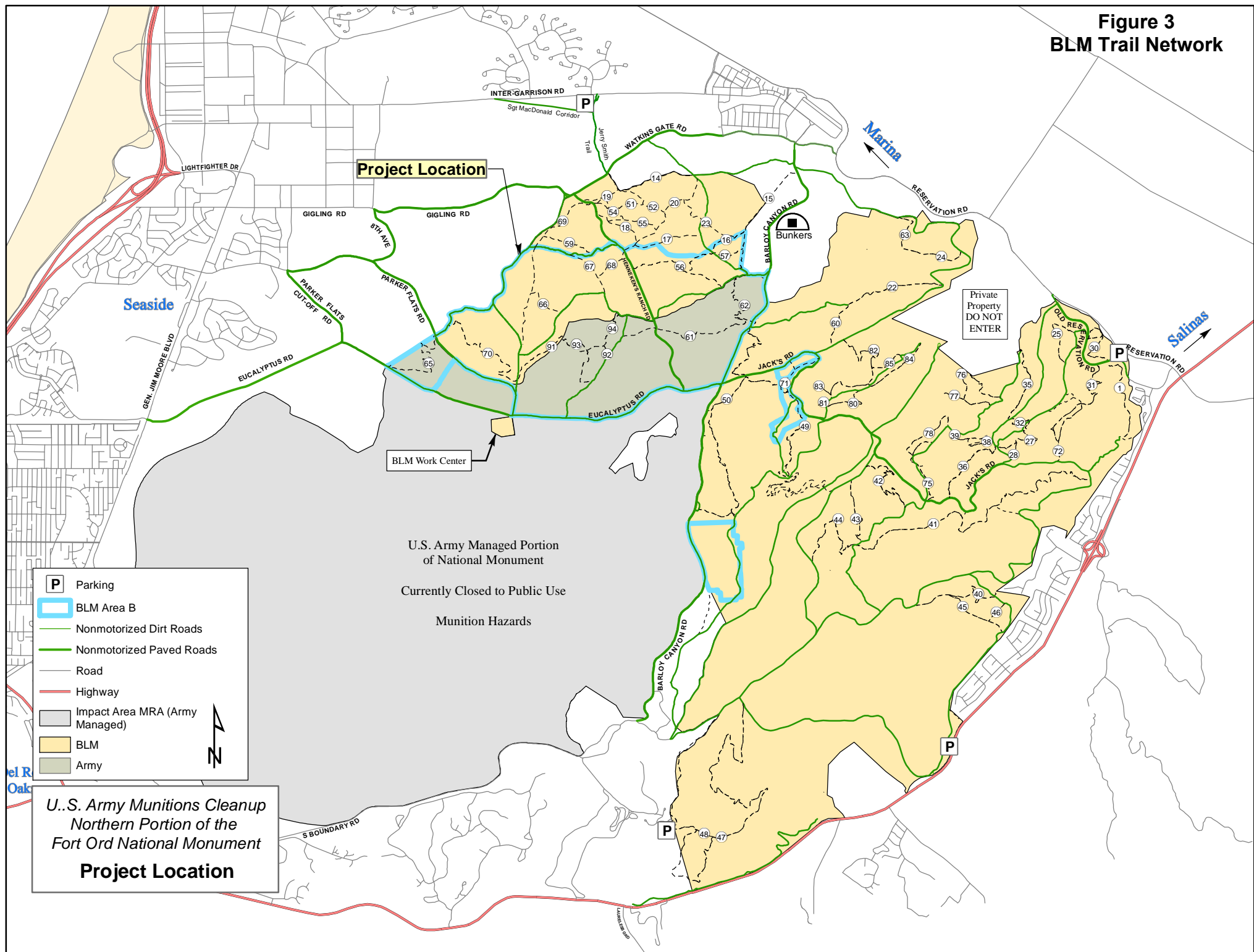


FIGURE 4
Parcel Ownership
(from OE-0907B)

| Parcel Number | Transfer Status |
|---------------|-----------------|
| F1.1.1 | Transferred |
| F1.1.2 | Transferred |
| F1.1.3 | Transferred |
| F1.13 | Not Started |
| F1.13.1 | Not Started |
| F1.2 | Transferred |
| F1.3 | Not Started |
| F1.7.4 | Not Started |
| L20.4 | In Progress |

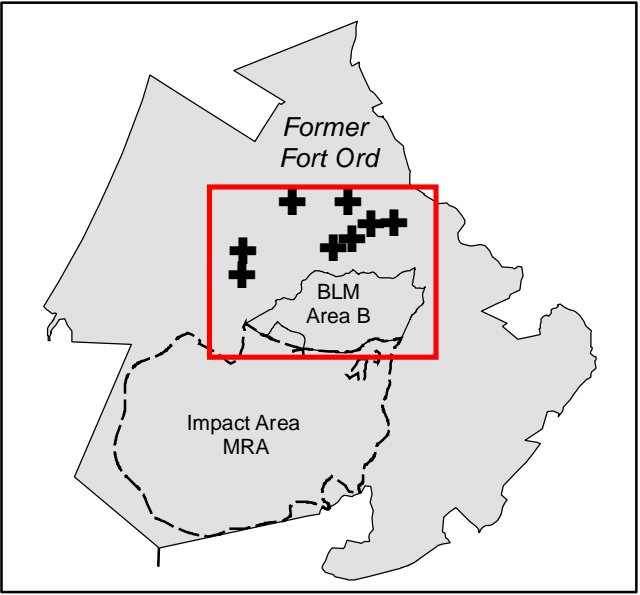
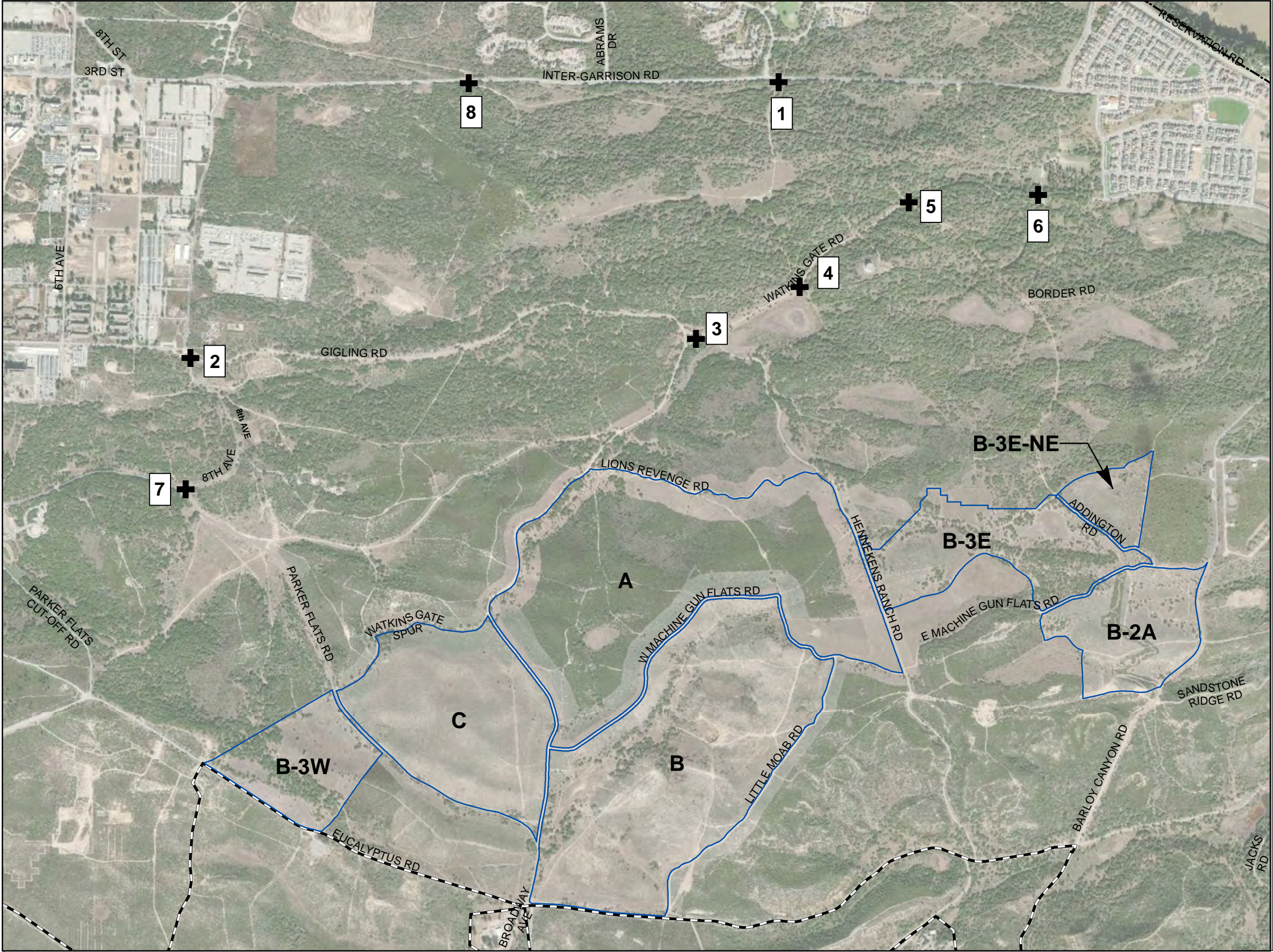
Notes:
BLM = Bureau of Land Management
MRA = Munitions Response Area
MOUT = Military Operations in Urban Terrain
F1.13 = Parcel ID

Legend:
 - Former Fort Ord Boundary
 - Fort Ord National Monument Boundary
 - BLM Area B
 - Impact Area MRA (to be transferred to BLM)
 - Property transferred to BLM
 - Property to be transferred to BLM

Land Use Control Implementation Plan
BLM Area B and MRS-16
Former Fort Ord, California

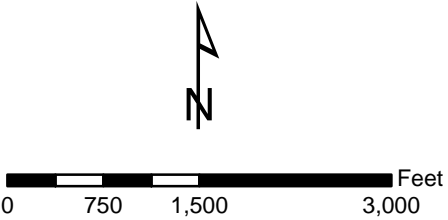
Parcel Ownership

FIGURE 6



- Legend**
- ⊕ Kiosk Location
 - BLM Area B Unit
 - ▭ Impact Area MRA
 - ▭ Former Fort Ord Property Line

| Location # | Location Name |
|------------|------------------------------------|
| 1 | Jerry Smith Corridor |
| 2 | Gigling and 8th Ave Ext |
| 3 | Gigling and Watkins Gate |
| 4 | Watkins Gate and Trail 52 |
| 5 | Addington and Watkins Gate |
| 6 | East Garrison at Watkins Gate |
| 7 | Parker Flats and 8th Ave Extension |
| 8 | SGT MacDonald Trailhead |



BLM Area B Remedial Action Report
(2017-2019)
Former Fort Ord, California

Figure 5
Kiosk Locations
(from BLM Area B Remedial Action Report)

Attachments

Acronym List

| | |
|---------|---|
| AR | Administrative Record |
| Army | U.S. Department of the Army |
| BLM | Bureau of Land Management |
| BRAC | Base Realignment and Closure |
| CalFire | California Department of Forestry and Fire Protection |
| CERCLA | Comprehensive Environmental Response, Compensation, and Liability Act |
| DA PAM | Department of the Army Pamphlet |
| DDESB | Department of Defense Explosives Safety Board |
| DESR | Defense Explosives Safety Regulation |
| DMM | discarded military munitions |
| DoD | Department of Defense |
| DTSC | California Department of Toxic Substances Control |
| EOD | explosive ordnance disposal |
| EPA | U.S. Environmental Protection Agency |
| FORA | Fort Ord Reuse Authority |
| FS | Feasibility Study |
| HMP | Installation-Wide Multispecies Habitat Management Plan |
| LUC | land use control |
| LUCIP | land use control implementation plan |
| MEC | munitions and explosives of concern |
| MMRP | Military Munitions Response Program |
| MRS | munitions response site |
| NPL | National Priorities List |
| NRMA | Natural Resource Management Area |
| OESS | Ordnance and Explosives Safety Specialist |
| POM | Presidio of Monterey |
| POMFD | Presidio of Monterey Fire Department |
| POMPD | Presidio of Monterey Police Department |
| RA | Remedial Action |
| RAO | Remedial Action Objectives |
| RD | Remedial Design |
| RI | Remedial Investigation |
| RI/FS | Remedial Investigation/Feasibility Study |
| ROD | Record of Decision |
| USACE | United States Army Corps of Engineers |
| USFWS | United States Fish & Wildlife Service |
| UXO | unexploded ordnance |

Definitions of Key Terms

Anomaly avoidance. Techniques employed on property known or suspected to contain UXO, other munitions that may have experienced abnormal environments (e.g., DMM), munitions constituents in high enough concentrations to pose an explosive hazard, or chemical agent (CA), regardless of configuration, to avoid contact with potential surface or subsurface explosive or CA hazards, to allow entry to the area for the performance of required operations.

Construction support. Assistance provided by DoD EOD or UXO-qualified personnel or by personnel trained and qualified for operations involving CA, regardless of configuration, during intrusive construction activities on property known or suspected to contain UXO, other munitions that may have experienced abnormal environments (e.g., DMM), munitions constituents in high enough concentrations to pose an explosive hazard, or CA, regardless of configuration, to ensure the safety of personnel or resources from any potential explosive or CA hazards.

Discarded military munitions (DMM). Defined in section 2710(e)(2) of Title 10, U.S.C. The term “discarded military munitions” means military munitions that have been abandoned without proper disposal or removed from storage in a military magazine or other storage area for the purpose of disposal. The term does not include unexploded ordnance, military munitions that are being held for future use or planned disposal, or military munitions that have been properly disposed of, consistent with applicable environmental laws and regulations.

Explosive ordnance disposal (EOD) personnel. Military personnel who have graduated from the Naval School, EOD; are assigned to a military unit with a Service-defined EOD mission; and meet Service and assigned unit requirements to perform EOD duties. EOD personnel have received specialized training to address explosive and certain CA hazards during both peacetime and wartime. EOD personnel are trained and equipped to perform render safe procedures (RSP) on nuclear, biological, chemical, and conventional munitions, and on improvised explosive devices.

EOD unit. A military organization constituted by proper authority; manned with EOD personnel; outfitted with equipment required to perform EOD functions; and assigned an EOD mission.

Land use controls (LUCs). Physical, legal, or administrative mechanisms that restrict the use of, or limit access to, real property, to manage risks to human health and the environment. Physical mechanisms encompass a variety of engineered remedies to contain or reduce contamination, or physical barriers to limit access to real property, such as fences or signs.

Munitions and explosives of concern (MEC). A term distinguishing specific categories of military munitions that may pose unique explosives safety risks:

- Unexploded ordnance (UXO), as defined in section 101(e)(5) of Title 10, U.S.C.;
- Discarded military munitions (DMM), as defined in section 2710(e)(2) of Title 10, U.S.C.; or
- Munitions constituent (e.g., TNT, cyclotrimethylenetrinitramine (RDX)), as defined in section 2710(e)(3) of Title 10, U.S.C., present in high enough concentrations to pose an explosive hazard.

Military munitions. Defined in section 101(e)(4) of Title 10, U.S.C.

(A) The term “military munitions” means all ammunition products and components produced for or used by the armed forces for national defense and security, including ammunition products or components under the control of the Department of Defense, the Coast Guard, the Department of Energy, and the National Guard.

(B) Such term includes the following: (i) Confined gaseous, liquid, and solid propellants; (ii) Explosives, pyrotechnics, chemical and riot control agents, smokes, and incendiaries, including bulk explosives and chemical warfare agents; (iii) Chemical munitions, rockets, guided and ballistic missiles, bombs, warheads, mortar rounds, artillery ammunition, small arms ammunition, grenades, mines, torpedoes, depth charges, cluster munitions and dispensers, and demolition charges; (iv) Devices and components of any item specified in clauses (i) through (iii).

(C) Such term does not include the following: (i) Wholly inert items; (ii) Improvised explosive devices; (iii) Nuclear weapons, nuclear devices, and nuclear components, other than nonnuclear components of nuclear devices that are managed under the nuclear weapons program of the Department of Energy after all required sanitization operations under the Atomic Energy Act of 1954 (42 U.S.C. 2011 et seq.) have been completed.

Munitions response area (MRA). Any area on a defense site that is known or suspected to contain UXO, DMM, or MC. Examples include former ranges and munitions burial areas. An MRA is comprised of one or more MRSs.

Munitions response site (MRS). A discrete location within an MRA that is known to require a munitions response.

Munitions constituent (MC). Defined in section 2710(e)(3) of Title 10, U.S.C.

The term “munitions constituents” means any materials originating from unexploded ordnance, discarded military munitions, or other military munitions, including explosive and nonexplosive materials, and emission, degradation, or breakdown elements of such ordnance or munitions.

Munitions debris (MD). Remnants of munitions (e.g., fragments, penetrators, projectiles, shell casings, links, fins) remaining after munitions use, demilitarization, or disposal.

Munitions response. Response actions, including investigation, removal actions, and remedial actions to address the explosives safety, human health, or environmental risks presented by UXO, DMM, or MC, or to support a determination that no removal or remedial action is required.

On-call construction support. Construction support provided, on an as-needed basis, where the probability of encountering UXO, other munitions that may have experienced abnormal environments (e.g., DMM), munitions constituent in high enough concentrations to pose an explosive hazard, or CA, regardless of configuration, has been determined to be low. This support can respond from offsite when called, or be onsite and available to provide required construction support.

On-site construction support. Dedicated construction support, where the probability of encountering UXO, other munitions that may have experienced abnormal environments (e.g., DMM), munitions constituent in high enough concentrations to pose an explosive hazard, or CA, regardless of configuration, has been determined to be moderate to high.

Small arms ammunition. Ammunition, without projectiles that contain explosives (other than tracers), that is .50 caliber or smaller, or for shotguns.

Unexploded ordnance (UXO). Defined in section 101(e)(5) of Title 10, U.S.C.

The term “unexploded ordnance” means military munitions that— (A) have been primed, fused, armed, or otherwise prepared for action; (B) have been fired, dropped, launched, projected, or placed in such a manner as to constitute a hazard to operations, installations, personnel, or material; and (C) remain unexploded, whether by malfunction, design, or any other cause.

UXO-qualified personnel. Personnel who have performed successfully in military EOD positions, or are qualified to perform in the following Department of Labor, Service Contract Act, Directory of Occupations, contractor positions: UXO Technician II, UXO Technician III, UXO Safety Officer, UXO Quality Control Specialist, or Senior UXO Supervisor.

Source: Defense Explosives Safety Regulation (DESR) 6055.09, Edition 1, January 13, 2019.

FORT ORD MUNITIONS INCIDENT FORM

If you recognize any object that resembles munitions or explosives on or near former Fort Ord property, retreat to a safe location, and **report the finding to 911 or the appropriate agency immediately** (see below). **You must telephone 911 to report suspected munitions or explosives on other than US Army property.**

This form can be submitted online at <https://fodis.net/mec/public/>. Completing this form does not constitute emergency (911) notification. This form is used to assist in the recording and investigation of MEC incidents.

CONTACT THE APPROPRIATE AGENCIES IMMEDIATELY:

| Location of Item | Contact Number | Date & Time Called |
|---------------------------------|--|--------------------|
| Public/Private/Unknown Property | Phone: 911* | |
| US Army, Fort Ord | Fort Ord BRAC office (831) 242-7919 | |

* If 911 is contacted please notify the Fort Ord BRAC office afterward:

Fax/email this form with Part A completed to (831) 393-9188 / Betsy.L.Hibbits@usace.army.mil

A. To be completed by person reporting the incident

| | |
|---|--|
| Name of person reporting: | Telephone: |
| Agency/Affiliation of person reporting: | Email Address: |
| Date & Time of Incident Discovery: | |
| Description of item found (refer to the "Safety Alert" pamphlet if possible): | |
| Location (direction and distance from nearest road/building; attach map if possible): | |
| GPS Coordinate Location Type of Instrument: Coordinate System: | Northing/Latitude and Easting/Longitude: |
| Describe how the item was found (e.g. activity leading to discovery; persons involved, etc.): | |

B. To be completed by the Fort Ord BRAC office when response/investigation is complete

| | |
|--|--|
| Report received by: | Date & Time: |
| Nomenclature of Item Found: Quantity: (Attach photo if possible) | Type (UXO, DMM, MD/Other): Depth: |
| Disposition of Item (e.g. detonated, removed to scrap, etc.): | Name of digital file for picture (date): |
| Investigation Summation: | |
| Regulatory Agencies Notified: | Date: |

Fort Ord Military Munitions Recognition and Safety Training

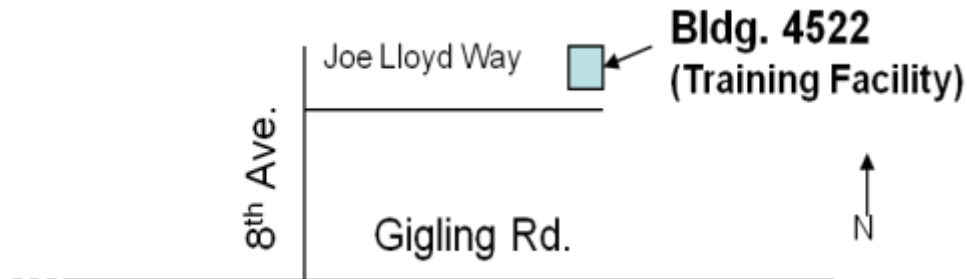
As a result of the Army's use of military munitions on the former Fort Ord, unexploded ordnance (UXO) may be encountered by those working on and reusing former Fort Ord property.



This training is recommended for anyone excavating on Fort Ord and required for all workers entering restricted munitions response sites.

The U.S Army Corps of Engineers (USACE) offers training to all contractors, property owners and workers involved in intrusive (digging) activities on the former Fort Ord. The training will orient attendees on UXO avoidance, the visual characteristics of UXO and the precautions necessary if it is encountered. Attendees will also be provided the procedures for contacting authorities if UXO is encountered.

- It is free.
- It takes about 30 minutes at the USACE facility.



To schedule training contact:

Fort Ord Community Relations Office at email:

Melissa.M.Broadston.ctr@mail.mil or (831) 393-1284.

Visit our website at: www.fortordcleanup.com for more information.

Para obtener una copia en Espanol contacte 831-393-1284.

Fort Ord Military Munitions Response Program (MMRP)
Ground-Disturbing or Intrusive Activity Information Form

Section A: to be completed by project proponent

Complete Section A, attach pertinent information.

Submit to U.S. Army at least 6 months in advance of your planned project.

Call Fort Ord BRAC MMRP Manager 831-242-7919 for any questions.

1 Location of the planned ground-disturbing or intrusive activity

- ☐ Impact Area Munitions Response Area
- ☐ BLM Area B and MRS-16
- ☐ Other BLM properties
- ☐ Other federal properties

Description:

2 Project contact information

Property Owner:

Organization

Representative name

Telephone number

email

Activity Point of Contact (POC):

Organization

POC name

Telephone number

email

3 Nature of the planned ground-disturbing or intrusive activity

Specific location and lateral footprint (attach a map)

Anticipated depth of ground disturbance

Type of equipment; description of anticipated ground-disturbance activity

Anticipated duration and start date for the activity

Are project participants current on munitions recognition and safety training or annual refresher? (Y/N) Is additional training needed? (Y/N)

4 Submit form to Fort Ord Base Realignment and Closure (BRAC) Office.

- ☐ Email Betsy.L.Hibbits@usace.army.mil
- ☐ Fax 831-292-9188
- ☐ In person 4463 Gigling Road, Seaside, CA

Received by:

Date:

Fort Ord Military Munitions Response Program (MMRP)
Ground-Disturbing or Intrusive Activity Information Form

Section B: to be completed by the Army

Determine whether construction support is required.

Determine the probability of encountering Munitions and Explosives of Concern (MEC).

Determine the minimum level of construction support.

5 Construction support is required (Impact Area MRA; BLM Area B; MRS-16; Parcel F2.6)

- ☐ Not required – BRAC Office to inform project POC recommending munitions recognition and safety training.
- ☐ Required – BRAC Office to forward form for probability determination.

6 The probability of encountering MEC is:

- ☐ Low
- ☐ Moderate/High

Brief rationale for the determination: (e.g., subsurface removal was completed)

7 The minimum level of construction support is:

- ☐ On-call construction support
 - ☐ UXOQP present
 - ☐ UXOQP offsite
- ☐ Anomaly avoidance
- ☐ On-site construction support

Exceptions or comments:

Above probability is determined by (UXO-qualified personnel or BRAC HQ)

| | |
|--------------|------------------|
| Organization | Telephone number |
| Name | Email |
| Signature | |

8 Fort Ord BRAC Office acceptance of the probability determination

| | |
|-----------|------------------|
| Name | Telephone number |
| Signature | |

Section C: to be completed by the Army

Describe how the support will be provided.

Identify the POC for the support.

Fort Ord Military Munitions Response Program (MMRP)
Ground-Disturbing or Intrusive Activity Information Form

| | |
|---|-------------------|
| 9 The required support will be provided by | |
| (a) Army: | |
| <input type="radio"/> USACE OESS <input type="radio"/> UXO contractor under contract with USACE | |
| USACE Project Manager (PM): | |
| Organization | Telephone number |
| POC name | email |
| POC for construction support for this project (example: OESS, UXOSO): | |
| Organization | Telephone number |
| POC name | Email |
| (b) Other than Army: | |
| <input type="radio"/> UXO-qualified personnel assigned to BLM <input type="radio"/> Other | |
| 10 Signature by BRAC Office (and USACE if applicable) | |
| Fort Ord BRAC Office | USACE PM |
| Name | Name |
| Signature | Signature |
| 11 BRAC Office will inform the project POC of construction support requirements. (check one) | |
| <input type="radio"/> email to _____ Date: _____ <input type="radio"/> fax to _____ | |
| 12 BRAC Office will file this form and future related documentation in the project file. | |
| Tracking Number: | Site File number: |

Former Fort Ord

LUC Annual Report Form

Covering January 1, 2____ to December 31, 2____

A. Summary of annual monitoring for calendar year ____

A.1. Document review

- Summarize public education actions implemented; comment on their appropriateness/effectiveness.

- Summarize munitions recognition and safety training program actions; comment on their effectiveness in capturing all people who need to be trained, the manner/ease of coordination; appropriateness of the material used.

- Summarize construction support actions that occurred; provide a list of ground-disturbing or intrusive activities with a short description, the level of construction support provided, and associated documents for onsite support (work plan, ESS and after-action report); comment on their effectiveness in capturing all ground-disturbing or intrusive activities, the manner/ease of coordination.

- Summarize reports of munitions encounters that occurred in BLM Area B & MRS-16; provide a list of the reports and final identification of the item (from the database); comment on the manner of incident response and reporting process.

- Provide a list of activities that occurred during this year and anticipated for the following year in the following tabular format and provide additional information, as available, as an attachment to this report:

| Activity Name | Probability of encountering MEC (low, medium, or high) | Level of construction support provided (on-call, anomaly avoidance, on-site) | Date of project start (estimated, if not started) | Date of project completion (estimated, if not complete) | Is additional information provided as an attachment? |
|---------------|--|--|---|---|--|
| | | | | | |
| | | | | | |

A.2. Site inspection

- Describe the inspection; what was inspected; any comments/findings relevant to the LUCs.

A.3. Interviews

- Summary of interviews: interviewee's observations and feedback on the LUC implementation and maintenance actions; to identify possible changes for process improvement; and to identify any changes in site conditions that could increase the possibility of encountering MEC.

Interviewee's Name and Position: _____
Interview Date: _____
Summary of Interview:

Interviewee's Name and Position: _____
Interview Date: _____
Summary of Interview:

B. Evaluation

General

B.1. Are there any changes in site conditions that could increase the possibility of encountering MEC?

☐ yes or ☐ no

If yes, provide a description of the changes in site conditions, explanation of the potential increase in the possibility of encountering MEC, and recommended changes or suggestions for process improvement.

B.2. In reviewing the information on munitions encounters from the document review and interviews, were there any munitions encounters that could increase the possibility of encountering MEC?

☐ yes or ☐ no

If yes, provide a description of the munitions encounters, explanation of the potential increase in the possibility of encountering MEC, and recommended changes or suggestions for process improvement.

PUBLIC EDUCATION

Public education will be provide based upon the Army's Recognize, Retreat, Report (3Rs) Explosives Safety Education Program and include the provision of 3Rs educational materials in brochures and at kiosks, and presented during public presentations and safety briefings. It will also encourage people to adhere to access management guidelines and may include trail markings, signage or other engineering controls, where warranted. The performance objectives for the public education LUC are: (a) to ensure that public land users are informed of the potential for MEC to be present and actions that should be taken if a suspected munitions item is encountered and (b) to ensure that public land users report discovery of suspected MEC items to local law enforcement.

B.3. Are there any issues that could interfere with meeting the performance objectives for Public Education?

☐ yes or ☐ no

If yes, provide a description of the issue(s), explanation of the potential interference with the performance objectives, and recommended changes or suggestions for process improvement.

Munitions Recognition and Safety Training

Munitions recognition and safety training is required for people who conduct ground-disturbing or intrusive activities. The performance objectives are: (a) to ensure that land users involved in ground-disturbing or intrusive activities are educated about the possibility of encountering MEC, and (b) to ensure that land users involved in ground-disturbing or intrusive activities stop the activity when encountering suspected MEC and report to the appropriate authority.

B.4. Are there any issues that could interfere with meeting the performance objectives for Munitions Recognition and Safety Training?

☐ yes or ☐ no

If yes, provide a description of the issue(s), explanation of the potential interference with the performance objectives, and recommended changes or suggestions for process improvement.

Construction Support by UXO-Qualified Personnel for Ground-disturbing or Intrusive Activities

The provision of construction support by UXO-qualified personnel is required for ground-disturbing or intrusive activities. The performance objective is to ensure projects involving ground-disturbing or intrusive activities are coordinated with UXO-qualified personnel so discoveries of potential MEC items will be handled appropriately.

B.5. Are there any issues that could interfere with meeting the performance objectives for construction support?

☐ yes or ☐ no

If yes, provide a description of the issue(s), explanation of the potential interference with the performance objectives, and recommended changes or suggestions for process improvement.

Prohibited Reuses and Activities or Restrictions

The ROD requires that the property transfer document include the following land use or activity restrictions:

- Prohibit unauthorized public access;
- Prohibit ground disturbing or intrusive activities outside of specified areas, unless construction support is provided by UXO-qualified personnel; and
- Prohibit uses of the property that are inconsistent with the HMP (e.g., residential, school and commercial/industrial development).

The performance objective is to ensure that the restrictions remain in place until they are changed with the concurrence of the Army and EPA in consultation with DTSC.

B.6. Are there any issues that could interfere with meeting the performance objectives for prohibited reuses and activities or restrictions?

☐ yes or ☐ no

If yes, provide a description of the issue(s), explanation of the potential interference with the performance objectives, and recommended changes or suggestions for process improvement.

| |
|--|
| |
|--|

Suggested Attachments to LUC Annual Report Form

1. Inspection record (including photos, if appropriate).
2. Listing of MEC Recording Forms filed and subsequent MEC determination.
3. Listing of ground-disturbance and intrusive activities conducted, level of construction support provided, and supporting documentation.
4. Table identifying the Construction Support After Action Reports along with types of construction support (on-call or on-site), if MEC items were found, and the amount and types of MEC items found.
5. Table of Munitions Recognition and Security Training dates and individuals trained.
6. List of public education materials and copies of fact sheets, brochures, and presentations used.
7. List of trespassing incidents and citations from law enforcement.
8. Interview records.

Appendix A

Safety Information for Wildfire Response on BLM Property at Fort Ord

11 March 2020

The Army is committed to providing reliable information that can be used by BLM to manage its former Fort Ord property in a safe manner.

Information about the completed and remaining munitions remedial actions is provided in a report of remedial actions completed in 2017-2019. The process for providing construction support for planned activities is described in the Interim Land Use Control Implementation Plan Update 2020. The Army recognizes that prescribed burning and wildfire response are part of the current and future uses of this property. To facilitate these activities to occur in a safe manner, additional safety information is provided in this appendix. The Army intends that this information be available for consideration and use by BLM and its fire management agency when planning for and implementing prescribed burns, wildland fire response, and fire risk management actions. California Department of Forestry and Fire Protection (CalFire) provides fire protection services on the BLM properties at the former Fort Ord.

Status of Munitions Responses in BLM Property Outside the Historical Impact Area

The Army's environmental cleanup activities under Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) have included a Track 2 Record of Decision (signed in 2017) that applies to approximately 1,700 acres of current and future BLM property north and east of the historical Impact Area. This remedial action includes additional munitions cleanup to remove munitions and explosives of concern (MEC) from ground surface of approximately 800 acres. Of this acreage, surface removal is complete except for one area (identified as "possible surface munitions area" in figures provided at Enclosures 1 and 2). This area is within Unit A where prescribed burning planned for 2018 did not occur due to lack of a day meeting required conditions for a burn.

Of the current and future BLM property outside the historical Impact Area (Enclosure 5):

- Track 2 area: The required munitions removal have been completed other than in the "possible surface munitions area" shown in Enclosure 2. Land use controls (safety protocols) are required for ground-disturbing activities.
- Track 1 area: No further action is required. There is no land use restriction.

Additional Safety Information for Wildfire Response (Unit A)

The "possible surface munitions area" is currently considered as having a potential for surface MEC to be present under brush. At this time, entry into this area without support by qualified unexploded ordnance (UXO) safety personnel is not recommended. Until the remedial action is completed, in the case of wildfire in this area, a horizontal exclusion distance of 1,759 feet applies to nonessential personnel. Horizontal exclusion zone of 316 feet applies to essential personnel. Presidio of Monterey Fire Department considers its personnel as "essential personnel" when conducting or responding to a burn and would place them as close to the burn as the 316-ft zone line. People who are not essential to conducting a response (e.g., public, media) are considered "nonessential personnel" and would be restricted from entering the 1,759-ft zone. Enclosures 1 and 2 show these zones.

Vertical exclusion distances (minimum drop heights) for wildfire suppression aircraft were previously required as a safety precaution. Based on the progress made in the remedial actions and considering the way such aircraft operate, the new recommendation of U.S. Army Corps of Engineers (USACE) Ordnance and Explosives Safety Specialist (OESS) is that, instead of height restrictions, aircraft crews should be advised to maintain their forward momentum and drop from their optimum heights. This recommendation has been incorporated into the Army's prescribed burn program since the 2018 burn season.

Additional Safety Information for Wildfire Response (All BLM Property)

As part of the remedial action, subsurface MEC removal has been conducted on designated fuel break roads (10-15 feet in width) and 15 feet on either side of the road (total approximately 45 feet in width). Subsurface removal has also been completed in 100-ft wide buffer area along habitat-development border lines. Fire management and suppression activities may be conducted within this space and other areas where surface and subsurface MEC removal have been conducted. These areas are shown as "permanent fuel breaks" and 100-ft wide buffer areas in the figure at Enclosure 3. Use of dozers or other mechanical equipment outside of the subsurface removal areas should be avoided; qualified UXO safety personnel should be consulted for off-road use of such equipment. During wildfire response, the USACE OESS assigned to the former Fort Ord will be available to provide advice. Please contact Fort Ord Base Realignment and Closure (BRAC) office at 831-242-7920 should you require assistance with regard to explosives safety.

Additional Safety Information for Wildfire Response (Impact Area Munitions Response Area)

Remedial action in the former Impact Area-portion of the Fort Ord National Monument (Army property) will continue in the next several years. Several access and activity restrictions apply to this property. Wildland fire response will be led by the Presidio of Monterey Fire Department. In such instances, any access restrictions, including exclusion zones, will be directed by the Presidio of Monterey Fire Department.

Notice of Potential for the Presence of MEC

Due to the former use of the property as a military installation, the property may contain MEC. The term MEC means specific categories of military munitions that may pose unique explosives safety risks and includes: (1) Unexploded Ordnance (UXO), as defined in 10 U.S.C. §101(e)(5); (2) Discarded military munitions (RMM), as defined in 10 U.S.C. §2710(e)(2); or (3) Munitions constituents (e.g., TNT, RDX), as defined in 10 U.S.C. §2710(e)(3), present in high enough concentrations to pose an explosive hazard. For the purpose of the basewide Military Munitions Response Program (MMRP) being conducted for the former Fort Ord, MEC does not include small arms ammunition (i.e., ammunition with projectiles that do contain explosives, other than tracers, that is .50 caliber or smaller, or for shotguns).

If any person should find any MEC (or suspected MEC) on the property, they shall immediately stop any intrusive or ground-disturbing work in the area or in any adjacent areas and shall not attempt to disturb, remove or destroy it, but shall immediately notify the local law enforcement agency having jurisdiction on the property so that appropriate explosive ordnance disposal (EOD) personnel (or local bomb squad with equivalent training) can be dispatched to address such MEC as required under applicable laws and regulations.

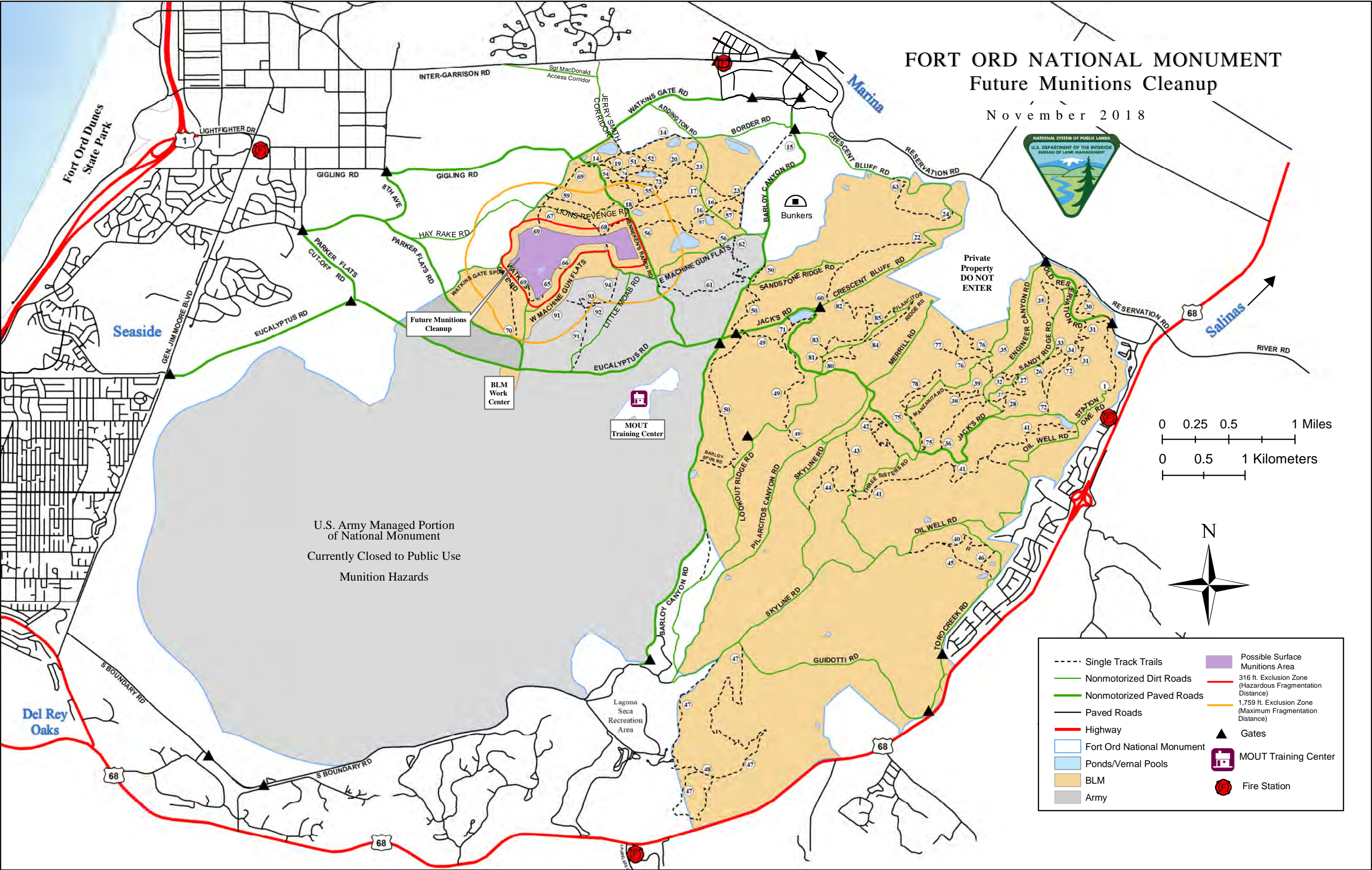
During emergency response such as wildfire response, the USACE OESS assigned to the former Fort Ord will be available to assist in responding to discovered items and to provide advice to Incident Commander. The Army recommends anyone who works on former Fort Ord to receive munitions recognition and safety training. The training is available by contacting the Fort Ord BRAC office at 831-242-7919.

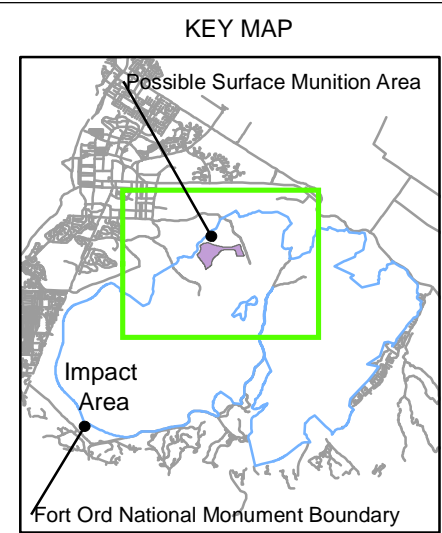
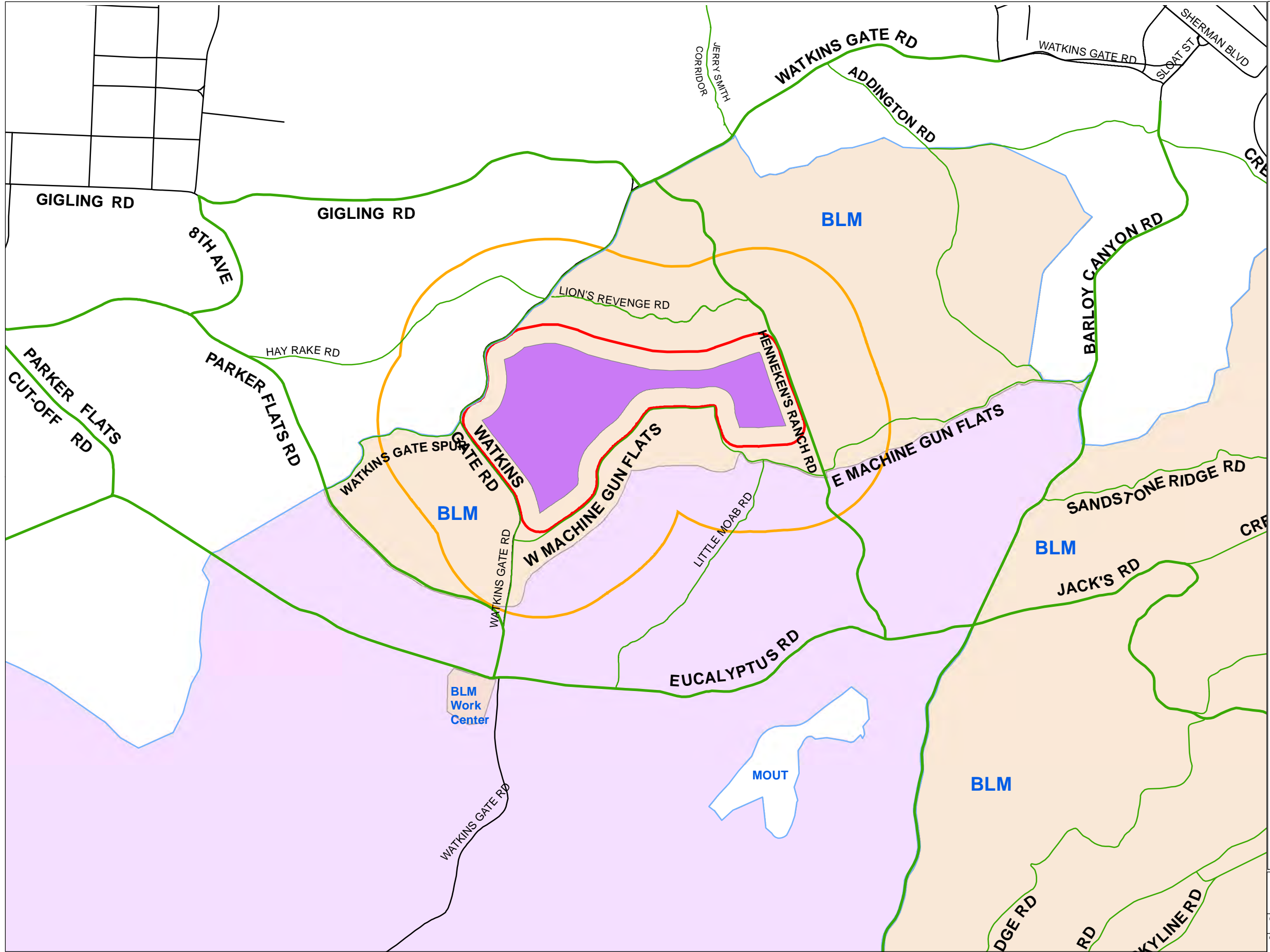
Enclosures

1. Exclusion zones, with Fort Ord National Monument background
2. Exclusion zones, zoomed in
3. Emergency Subsurface Action Plan (oversized map)
4. Escort map, BLM Area B
5. Track1 and Track 2 areas

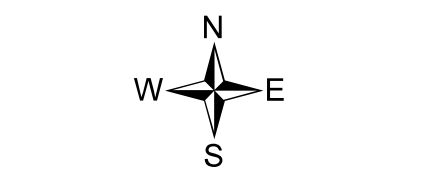
FORT ORD NATIONAL MONUMENT Future Munitions Cleanup

November 2018

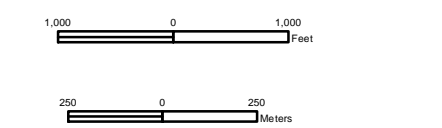




FOR PLANNING PURPOSES ONLY



- Possible Surface Mmunition Area
- 316 ft. Exclusion Zone (Hazardous Fragmentation Distance)
- 1,759 ft. Exclusion Zone (Maximum Fragmentation Distance)
- To Be Transferred (Army DPA)
- BLM Property
- Fort Ord National Monument
- Nonmotorized Dirt Roads
- Nonmotorized Paved Roads
- Paved Roads



| FORMER FORT ORD MONTEREY, CALIFORNIA | |
|---|--------------------|
| PRINT DATE: 12/20/2018 | SCALE: 1:20,000 |
| FILE: BLM Option a-c areas with MEC_20181220.mxd | |

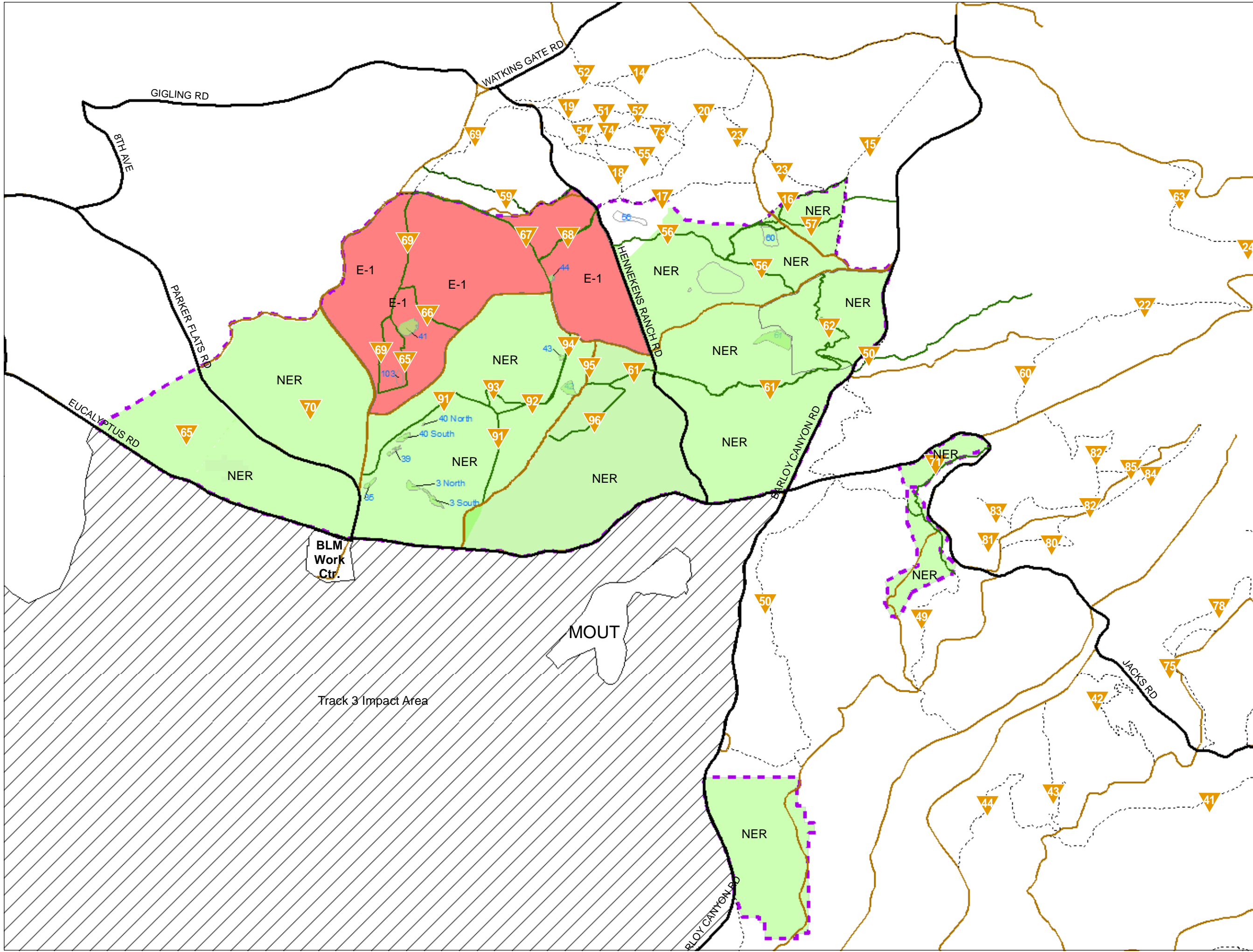


Figure 2
Former Fort Ord BLM Area B
UXO Escort Requirement Fort Ord
For Non-intrusive Surface Activities

Interim Access Restrictions
As of 19 September 2019
Updated as needed

Based on:

- MEC items
- Type of clearance
- Temp fence

BLM Area B Boundary **

Escort Required (E) *

No Escort Required (NER)

E-1 Escort Required (E-1)

Ponds within BLM Area B ***

BLM Trails No Escort Required (NER)

BLM dirt roads

BLM Trails

Paved Roads

*Escort required in areas where current MR work is in progress in BLM Area B and to the nearest BLM trail.

**Ground intrusive activities are prohibited within BLM Area B without construction support

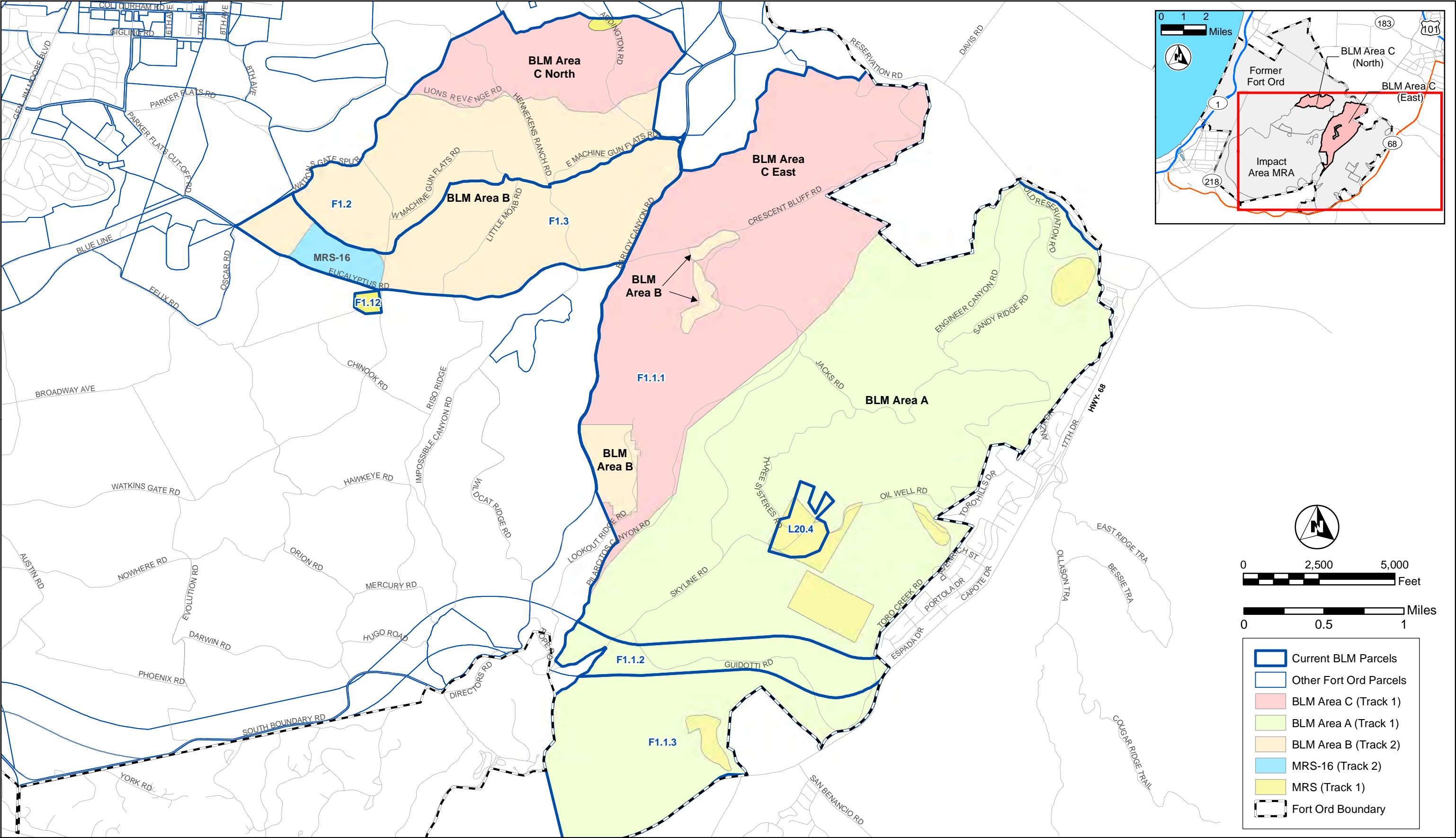
***Check with the Army on escort requirements in ponds within BLM Area B

Maintain DGM Separation Distances

U.S. ARMY CORPS OF ENGINEERS

0 1,000 2,000 Feet

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|---|---|
| PRINT DATE: 9/19/2019 | SOURCE OF DATA: Fort Ord MMRP Database |
| | SCALE: 1:20,000 |
| DRAWN BY: Cary.a.stiebel@usace.army.mil | SCALE: 1 inch equals 1,667 feet |
| FILE: Figure 2 BLM Area B Escort Requirements9-19-2019.mxd | |



Track 1 Plug-In Approval Memorandum BLM Area C
Former Fort Ord, California

OE-0939

Figure 3
Parcel Map

Appendix B

RESPONSES TO COMMENTS

Document: Interim Land Use Control Implementation Plan Update
Track 2 Bureau of Land Management Area B and Munitions
Response Site 16, Former Fort Ord, California. April 2020.
Commenting Organization: U.S. Environmental Protection Agency (EPA), Region IX
Name: Maeve Clancy
Date of Comments: July 19, 2020

General Comment 1:

The review of the Interim Land Use Control Implementation Plan Update, Bureau of Land Management Area B and Munitions Response Site 16, Former Fort Ord, California, dated April 2020 (hereinafter referred to as the ILUCIPU BLM Area B & MRS 16), noted that there are some statements provided that require additional information. These are:

- In Section 2.2.3, Cleanup Objectives, it is stated that, “Risks to plants and animals from explosive hazards are not addressed in the ROD.” However, no further statement concerning these risks is provided in the document, and the location of information pertaining to these risks is not referenced. Therefore, it is unclear whether it is acceptable or unacceptable to address these risks. Please revise the ILUCIPU BLM Area B & MRS 16 to state whether risks to plants and animals from explosive hazards is considered acceptable, unacceptable, or is/will be addressed elsewhere, and provide reference if these risks have been addressed. If they are not to be addressed per the ROD, please state this positively, and also state the basis for not addressing them.
- Section 2.5, Related Site Management Information, states that, “Vertical exclusion zones was discontinued based on a new recommendation by USACE.” No reason is provided or referenced in the body of the ILUCIPU BLM Area B & MRS 16 to explain the basis for this determination, although an explanation is provided in the last paragraph of the Additional Safety Information for Wildfire Response (Unit A) section of Appendix A, Safety Information for Wildfire Response on BLM Property at Fort Ord. Please provide this information at the first mention of the elimination of the vertical exclusion zones, or include a reference that it may be found in Appendix A.

Response to General Comment 1:

The cited statement in Section 2.2.3 is taken from the Record of Decision (ROD) for Bureau of Land Management (BLM) Area B and Munitions Response Site 16 (MRS-16). The ROD also noted: “Based on years of site experience, the potential presence of munitions and explosives of concern (MEC) in BLM Area B and MRS-16 does not appear to be a concern in terms of explosive safety risks to ecological receptors” (Section 1.4). For clarification, the cited statement will be revised to: “Based on years of site experience, the potential presence of MEC in BLM

RESPONSES TO COMMENTS

Area B and MRS-16 does not appear to be a concern in terms of explosive safety risks to ecological receptors, therefore, Risks to plants and animals from explosive hazards are not addressed in the ROD.”

For clarification, the cited statement in Section 2.5 will be revised as follows: “Vertical exclusion zones were ~~was~~ discontinued based on a new recommendation by USACE (further information is provided in Appendix A).”

Specific Comment 1:

Introduction, Page 1: The fourth paragraph of this section states that, “In the absence of a munitions response contract, the most significant change is that tasks requiring UXO-qualified personnel will be managed by U.S. Army Corps of Engineers (USACE) Ordnance and Explosives safety Specialist (OESS) assigned to Fort Ord, supplemented by additional qualified personnel as arranged by USACE.” The correct definition of OESS should read “Ordnance and Explosives Safety Specialist.” Please make this correction.

Response to Specific Comment 1:

Text in the cited sentence will be corrected.

Specific Comment 2:

Section 3.1, Public Education, Page 8: The first sentence of the second paragraph of this section notes that, “For BLM Area B and MRS-16, the following public education measures may be applicable:”. However, the statement “...may be applicable:” leaves open the question as to whether or not these measures will be required. Please revise the noted section to specify that the noted LUCs will be required, or provide an explanation of the conditions that would eliminate each one from consideration.

Response to Specific Comment 2:

The ROD specifies that public education to be “based upon the Army’s 3Rs of Explosives Safety Education Program” (recognize, retreat, and report) and to “encourage people to adhere to access management guidelines” (Section 2.14.2). The ROD emphasized the message content of public education rather than requiring specific activity or method of delivery. Recent and current public education implementation actions are described in Section 3.1.2. All of the methods listed in Section 3.1 (kiosks, brochures and physical measures) are currently in use, however, they may be discontinued in the future based on annual reviews against the performance objectives. Annual monitoring and reporting of the remedial land use controls is described in Section 4.2 of the document.

RESPONSES TO COMMENTS

Specific Comment 3:

Section 3.1.2, Implementation, Page 9: The second bullet (frequently Asked Questions, Munitions Cleanup) of this section employs the term “construction safety support” to indicate what should be labeled as “construction support.” As the actions noted are referred to elsewhere in the document as “construction support” (an official term defined in the Department of Defense Ammunition and Explosives Safety Standard [DESR 6055.09, Edition 1, January 13, 2019], and in the Definitions of Key Terms attachment of the ILUCIPU BLM Area B & MRS 16), this term should be revised to read “construction support” to eliminate possible confusion as to what is meant in the discussion. Please make this change.

Response to Specific Comment 3:

Text in the cited statement will be revised as recommended.

RESPONSES TO COMMENTS

Document: Interim Land Use Control Implementation Plan Update
Track 2 Bureau of Land Management Area B and Munitions
Response Site 16, Former Fort Ord, California, April 2020
Commenting Organization: Fort Ord Community Advisory Group (FOCAG)
Name: Mike Weaver
Date of Comments: June 9, 2020

Comment:

“Thank you for the Land Use Control Implementation Plan update. We understand this area remains dangerous for people and animals.”

“Thank you too for the useful large enclosed map; Munitions Safety Consideration in Fire Suppression dated 4/28/2020. Many of us live in the dry hills surrounding much of former Fort Ord. Wild fires here are an ongoing threat. Please do not have prescribed burns on former Fort Ord thereby adding to the existing danger.”

Response to Comment:

The Record of Decision for Bureau of Land Management (BLM) Area B and Munitions Response Site 16 required remedial actions to be conducted in portions of BLM Area B, and the majority of this work has been completed. Visitors who comply with posted restrictions and remain on designated trails and roads are safe from munitions hazards.

The potential for munitions and explosives of concern (MEC) to remain in the site still exists. To manage risks from MEC that could remain present after the munitions cleanup, land use controls were identified as part of the selected remedy. This document describes how the land use controls will be implemented.

Remedial action in Unit A of BLM Area B remains to be completed. As described in approved work plans, this work will include prescribed burning to clear vegetation to expose the ground surface for munitions removal. Prescribed burning is the primary method of vegetation clearance in habitat reserve containing central maritime chaparral, and is consistent with both the Fort Ord Habitat Management Plan and the Biological Opinion issued by U.S. Fish and Wildlife Service. At Fort Ord, the Army takes extensive precautions to ensure that prescribed burns are conducted under appropriate weather conditions and are contained. When planning for prescribed burn operations, a considerable effort is made, focusing on fire containment and minimizing smoke impacts to the community. The Army will provide public notification of planned prescribed burns that are part of the environmental cleanup program at the former Fort Ord. The Army does not plan to conduct a prescribed burn at Fort Ord in 2020.