

APPENDIX E

Response to Comments

Response to Comments

DRAFT Group 1 Remedial Investigation/Feasibility Study Work Plan, dated May 23, 2008
Review Comments provided by Judy Huang of EPA, dated July 9, 2008

No.	Comment Type / Report Section	Comment/Response
1	EPA General Comment	<p>Comment: The Draft Group 1 Remedial Investigation/Feasibility Study Work Plan, Seaside Munitions Response Area and Parker Flats Munitions Response Area Phase II, dated May 23, 2008, (hereinafter referred to as the Dft GP 1 RI/FS WP, Seaside & Parker Flats MRAs, Phase II), presents the Quality Control (QC) process to be used during the execution of the RI/FS in a fragmented manner. It is understood that some of this fragmentation is due to the format of the document that is prescribed by the RI/FS requirements. However, there is no identifiable portion of the document or its appendices that contains a listing of all of the activities to be evaluated by QC, the evaluation criteria for each activity evaluated, and the associated pass/fail criteria. A listing of this information would be very valuable for use during the execution of the work plan and would assist those evaluating the quality of these processes in their efforts. Please provide a table/chart that provides this information in an appropriate location in the body of the Dft GP 1 RI/FS WP, Seaside & Parker Flats MRAs, Phase II.</p> <p>Response: Quality control (QC) operations for Geophysics and Unexploded Ordnance (UXO) operations are defined in Section 5, Section 11, and Appendix E (Quality Assurance Project Plan) of Volume 2 of the Group 1 Remedial Investigation/Feasibility Study (RI/FS) Work Plan. The QC components in the Group 1 RI/FS Work Plan related to Geophysics and UXO operations have been consolidated into Appendix E, leaving Section 11 as the overarching Quality Control Plan. The QC components in Section 5 have been maintained, but now reference Appendix E.</p> <p>A table has also been incorporated into Appendix E that presents a quick reference for UXO and Geophysics QC operations.</p>
2	EPA General Comment	<p>Comment: The Draft GP 1 RI/FS WP, Seaside & Parker Flats MRAs, Phase II, refers to a number of teams throughout the document and its appendices. In most instances, the makeup of these teams is not provided. Some of the teams listed include: Excavation Team, UXO Team, UXO Intrusive Team, Brush Cutting Team, Geophysical Team, Chipper Team, Reacquisition Team, Dig Team, Field Team, Mechanical Vegetation Cutting Team, and ESCA RP Team. Some of these teams are defined by function and makeup in the document, but most are not. Please review the teams listed in the Dft GP 1 RI/FS WP, Seaside & Parker Flats MRAs, Phase II, and define the function and make up of each team when first introduced in the text or at another appropriate location that may be referenced at the first introduction of the team in the text.</p>

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		<p>Response: The definitions or identifications of the members that make up the teams mentioned throughout the report have been added to the document. In addition, the text has been revised to ensure consistent use of the various team names throughout the Group 1 RI/FS Work Plan - Volumes 1 and 2 (including the appendices).</p>
1	EPA Specific Comment – Executive Summary, Sampling and Analysis Plan (Volume 2), Page xv	<p>Comment: The next-to-last sentence in the third paragraph of this section on page xv, in referring to the results of the surface sweep, states that, “If significant subsurface MEC (either in high concentration or high risk unexploded ordnance) are discovered during the investigation, the immediate vicinity may be intrusively investigated to ascertain the limits of the condition.” The use of the word “may” in this sentence raises a concern as to the criteria that will make this further investigation obligatory. Please revise the cited section of the Executive Summary to state the specific criteria that will be used to determine whether the noted intrusive investigation will be initiated, or reference where this information may be found elsewhere in the document or its appendices.</p> <p>Response: This work plan does not contain specific criteria that will be used to determine whether intrusive investigation will be initiated. Therefore, the Executive Summary (as well as corresponding text in Section 4.5.2 of Volume 1 and Sections 2.2.1 and 2.3.7 of Volume 2) has been revised as follows to clarify the approach:</p> <p>“The purpose of the surface sweep in the accessible habitat reserve areas will be to identify and remove anomalies that are on or near the surface (within 3 inches). <i>Surface and near-surface finds (MEC and MD) will be fully documented and reviewed by the ESCA RP Team in consultation with the regulatory agencies during the investigation. If the ESCA RP Team in consultation with the regulatory agencies determine that significant near-subsurface MEC (either high concentration or high-risk unexploded ordnance) has been discovered during the investigation, a field variance will be developed to change the investigation approach to include a focused intrusive investigation</i> the immediate vicinity may be intrusively investigated to ascertain the limits of the condition.”</p>
2	EPA Specific Comment – Volume 1, Work Plan, Section 4.7, Explosives	<p>Comment: The last sentence of the first paragraph of this section states that, “Rather, it relies on an assumption that any encounter with MEC will result in an adverse effect, and provides a qualitative description of the explosives safety risk, based on the likelihood of encountering a MEC item combined with the potential of the item to cause a serious injury if detonated.” While many of</p>

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	Safety Risk Assessment, Page 4-7	<p>the munitions items that may be found on the sites of concern can detonate, some are items that do not detonate, but burn or eject pyrotechnic cargoes that burn when they function. Based on this differing results of a munitions item functioning due to stimulus from a personal encounter, a better description of the results would be achieved if the words “it functions” replaced the word “detonated” in the cited sentence. Please make this correction here and elsewhere as appropriate in the Dft GP 1 RI/FS WP, Seaside & Parker Flats MRAs, Phase II.</p> <p>Response: The sentence has been revised as follows:</p> <p>“Rather, it relies on an assumption that any encounter with MEC will result in an adverse effect, and provides a qualitative description of the explosives safety risk, based on the likelihood of encountering an MEC item combined with the potential of the item to cause a serious injury if detonated-it <i>functions.</i>”</p>
3	EPA Specific Comment – Volume 1, Work Plan, Appendix A, Seaside MRA Conceptual Site Model, Section 4.1.3, Historical Military Use, Page 4-2	<p>Comment: The last sentence in this section notes that, “It is expected that munitions activity associated with these ranges would have occurred within the firing points.” This statement may not be accurate, depending on the definition applied to the term “munitions activity.” Please revise this section to include a description of what constitutes “munitions activity,” or expand it to better explain the intent of the cited sentence.</p> <p>Response: The last sentence of this section has been revised as follows:</p> <p>“According to the known configuration of the ranges, weapons were fired to the east and southeast from these firing points toward the center of the impact area (Figure 4.1-2). It is expected that munitions activity associated with these ranges would have occurred within <i>the range fans associated with</i> the firing points. <i>A munitions activity is intended to include military training activities at or near the range that involve the use or handling of military munitions.</i>”</p>
4	EPA Specific Comment – Volume 1, Work Plan, Appendix A, Seaside MRA Conceptual Site Model,	<p>Comment: This section presents a general discussion of the potential exposure pathways from munitions items that may currently be present on the Seaside MRA. The results of this analysis are referenced as presented in Table 4.6-1, Seaside MRA – Potential Receptors and Exposure Media. The potential receptors listed include Construction Worker, Utility Workers, Trespassers, Firefighters, Emergency Response Workers, Ancillary Workers, Residents, and Recreational Users. The table divides these receptors into two categories,</p>

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	Section 4.6, Seaside MRA Pathway Analysis, Page 4-11	<p>which are Current and Future. The Exposure Media listed is Ground Surface and Below Grade.</p> <p>None of the potential receptors are listed as being potentially exposed to MEC present on the ground surface either in the Current or Future periods. Also, only the Construction Workers, Utility Workers, Firefighters, and Residents are identified as being potentially exposed to MEC present in the subsurface. The Trespassers, Emergency Response Workers, Ancillary Workers, and Recreational Users are listed as having no potential exposure to MEC present on the Ground Surface or in the Subsurface during either time period. No details as to how these determinations were made are provided in the cited section.</p> <p>No MEC removal action short of complete excavation and removal (or screening) of the soil to the potential penetration depths of the munitions used will provide a complete assurance that no MEC remains on the site so treated. Based on this fact, the presence of MEC on and beneath the surface of the Seaside MRA cannot be ruled out, both before and after surface and subsurface removals have been conducted. Therefore, any person entering the site has the potential to contact MEC on the surface, and any person conducting any intrusive activity on the site has the potential to contact subsurface MEC, both prior to and after the removal actions have been completed.</p> <p>Please review the cited section and table and revise them as necessary to present the correct exposure potential for the listed receptors.</p> <p>Response: Table 4.6-1 has been revised to include a complete analysis of receptors and potential exposure media/scenarios.</p>
5	EPA Specific Comment – Volume 1, Work Plan, Appendix A, Seaside MRA Conceptual Site Model, Table 4.1-4, Seaside MRA – Historical Military Use, Page 4-17	<p>Comment: In the row entitled “Range 23M,” the second bullet in the Description column lists “Dragon Rounds” as having been found on this range. As “Dragon rounds” would be an unfired missile, this is highly unlikely. Please review the cited table and correct it as necessary.</p> <p>Response: Although it is agreed that the term Dragon “rounds” may be misleading or incorrect, the statement that they were used or found on Range 23M comes from the Archives Search Report prepared by the USACE in October 1993. The Archives Search Report presents information obtained through historical research at various archives and records holding facilities, interviews with individuals associated with the site or operations, and personal visits to the site. The Archives Search Report indicates that Ordnance Items Found or</p>

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		Utilized on Range 23M were “Dragon missiles (practice and HEAT), 4.2” Mortar.” The report does not differentiate between items that were found and items that were used. The term “round” has been revised to include the full nomenclature as reported in the Archive Search Report, but no other changes have been made to the tables.
6	EPA Specific Comment – Volume 1, Work Plan, Appendix A, Seaside MRA Conceptual Site Model, Figure 4.6-1, Seaside MRA Pathway Analysis Flowchart	<p>Comment: In the column entitled “Expected MEC Contamination,” some of the boxes in the column list “MD” as a possible component. As MD is not a subcomponent of MEC, this is technically an incorrect usage. Either the column heading should be revised to replace the term “MEC” or the MD should be removed from the noted boxes in the column. Please correct this as needed.</p> <p>In addition, the column entitled “Secondary Sources” lists both Ground Surface and Below Grade as the initial media contaminated by MEC. However, the Ground Surface source is not continued to completion on the flowchart, as is the case with the Below Grade category. Please complete the evaluation of this source in the flowchart.</p> <p>Response: MD has been removed from the boxes in the analyses. In addition, the figure has been updated to reflect a completed pathway analysis through the four remaining columns for the Ground Surface category.</p>
7	EPA Specific Comment – Volume 1, Work Plan, Appendix B, Parker Flats MRA Conceptual Site Model, Section 5.6, Parker Flats MRA Pathway Analysis, Page 5-10	<p>Comment: This section presents a general discussion of the potential exposure pathways from munitions items that may currently be present on the Parker Flats MRA. The results of this analysis are referenced as presented in Table 5.6-1, Parker Flats MRA – Potential Receptors and Exposure Media. The potential receptors listed include Construction Worker, Utility Workers, Trespassers, Firefighters, Emergency Response Workers, Ancillary Workers, Residents, and Recreational Users. The table divides these receptors into two categories, which are Current and Future. The Exposure Media listed is Ground Surface and Below Grade.</p> <p>With the exception of Emergency Response Workers and Residents, all of the potential receptors are listed as being potentially exposed to MEC present on the ground surface, either in the Current or Future periods. An exception is the Recreational User, who is not listed for the Current period. Also, the Trespassers, Emergency Response Workers, Ancillary Workers, and Recreational Users are identified as not being potentially exposed to MEC present in the subsurface. Only the Emergency Response Workers are listed as having no potential exposure to MEC present on the Ground Surface or in the Subsurface during either time period. No details as to how these</p>

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		<p>determinations were made are provided in the cited section.</p> <p>As has previously been noted, no MEC removal action short of complete excavation and removal (or screening) of the soil to the potential penetration depths of the munitions used will provide a complete assurance that no MEC remains on the site so treated. Based on this fact, the presence of MEC on and beneath the surface of the Seaside MRA cannot be ruled out, both before and after surface and subsurface removals have been conducted. Therefore, any person entering the site has the potential to contact MEC on the surface, and any person conducting any intrusive activity on the site has the potential to contact subsurface MEC, both prior to and after the removal actions have been completed.</p> <p>Please review the cited section and table and revise them as necessary to present the correct exposure potential for the listed receptors.</p> <p>Response: Table 5.6-1 has been revised to include a complete analysis of receptors and potential exposure media/scenarios.</p>
8	EPA Specific Comment – Volume 1, Work Plan, Appendix B, Parker Flats MRA Conceptual Site Model, Table 5.3-2, Parker Flats MRA Phase II – Removal Activities, Page 5-22	<p>Comment: In the row entitled “MRS-15MOCO.2,” the fourth bullet in the Summary column has a sentence that states, “This operation identified areas [or an area? Areas is correct] of obstructions/interferences such as asphalt, and material from the Range 45 pad, or telephone poles as SCA (Parsons 2004b).” Either this sentence is very poorly constructed or editorial comments have not been expunged from the table. Please review this table and correct it as necessary.</p> <p>Response: The table has been revised and the editorial comment removed.</p>
9	EPA Specific Comment – Volume 1, Work Plan, Appendix B, Parker Flats MRA Conceptual Site Model,	<p>Comment: In the column entitled “Expected MEC Contamination,” the box in the column list “MD” as a possible component. As MD is not a subcomponent of MEC, this is technically an incorrect usage. Either the column heading should be revised to replace the term MEC or the MD should be removed from the noted box in the column. Please correct this as needed.</p> <p>In addition, the column entitled “Secondary Sources” only lists Below Grade as the initial media contaminated by MEC. However, the Ground Surface</p>

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	Figure 5.6-1, Parker Flats MRA Pathway Analysis Flowchart	<p>source is discussed in Section 5.6.1, Exposure Pathways, and is also referenced in Table 5.6-1, Parker Flats MRA – Potential Receptors and Exposure Media. Please provide an evaluation of this source in the flowchart.</p> <p>Response: MD has been removed from the boxes in the analysis. In addition, the figure has been updated to reflect a completed pathway analysis for the Ground Surface category.</p>
10	EPA Specific Comment – Volume 2, Sampling and Analysis Plan, Section 2.2.1, Parker Flats MRA – Phase II Remedial Investigation, Page 2-2	<p>Comment: The last sentence in the third paragraph of this section, in referring to the results of the surface sweep, states that, “If significant subsurface MEC (either high concentration or high risk unexploded ordnance [UXO]) are discovered during the investigation, the immediate vicinity may be intrusively investigated to ascertain the limits of the condition.” The use of the word “may” in this sentence raises a concern as to the criteria that will make this further investigation obligatory. Please revise the cited section to state the specific criteria that will be used to determine whether the noted intrusive investigation will be initiated, or reference where this information may be found elsewhere in the document or its appendices.</p> <p>Response: This work plan does not contain specific criteria that will be used to determine whether intrusive investigation will be initiated. Therefore, Sections 2.2.1 and 2.3.7 of Volume 2 have been revised as follows to clarify the approach:</p> <p><u>Section 2.2.1</u> “The purpose of the surface sweep in the accessible habitat reserve areas will be to identify and remove anomalies that are on or near the surface (within 3 inches). <i>Surface and near-surface finds (MEC and MD) will be fully documented and reviewed by the ESCA RP Team in consultation with the regulatory agencies during the investigation. If the ESCA RP Team in consultation with the regulatory agencies determine that significant near-subsurface MEC (either high concentration or high-risk unexploded ordnance [UXO]) has been discovered during the investigation, a field variance will be developed to change the investigation approach to include a focused intrusive investigation</i> the immediate vicinity may be intrusively investigated to ascertain the limits of the condition.”</p> <p><u>Section 2.3.7</u> “Any MEC items encountered on the surface will be immediately reported to the SUXOS, surveyed with a GPS unit for documentation purposes, and handled in accordance with the proper handling procedures. If an anomaly is</p>

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		<p>detected using analog instruments, the UXO Technician will investigate the anomaly to a depth of 3 inches. If MEC items are recovered during this task this information will be noted and additional investigation will be proposed for this area. If the anomaly cannot be located within the top 3 inches of soil surface, the soil will be replaced and the location will be flagged and surveyed using a GPS instrument, <i>if coverage is available. In the event that GPS coverage is not available, the anomaly will be marked on the grid map and the coordinates will be manually entered.</i> The SUXOS will summarize a list of anomalies that could not be fully investigated and/or areas where MEC was found that require additional investigation. <i>Surface and near-surface finds (MEC and MD) will be fully documented and reviewed by the ESCA RP Team in consultation with the regulatory agencies during the investigation. If the ESCA RP Team in consultation with the regulatory agencies determine that significant near-surface MEC (either high concentration or high-risk UXO) has been discovered during the investigation, a field variance will be developed to change the investigation approach to include a focused intrusive investigation to ascertain the limits of the condition.</i>"</p>
11	EPA Specific Comment – Volume 2, Sampling and Analysis Plan, Section 2.3.5.1, Excavation of Digitally Reacquired Anomalies, Page 2-9	<p>Comment: The last sentence in this section states, "If MEC are encountered that are suspected of containing unknown filler, MEC extinction will be conducted in accordance with the SOP for MEC with Unknown Filler presented in Appendix D of this G1 SAP." Please explain the reason for the use of the word "extinction" in this sentence and what it entails.</p> <p>Response: The word extinction has been replaced with <i>disposition</i> in the text. The activities associated with disposition of the MEC items suspected of containing unknown fillers are described in Appendix D (the SOP for MEC with Unknown Filler), as described in the text.</p>
12	EPA Specific Comment – Volume 2, Sampling and Analysis Plan, Section 5.25, Geophysical QC Surveys, Page 5-19	<p>Comment: In the three sub-elements (QC-1, QC-2, and QC-3) of the first paragraph of this section, the basic concepts of these three QC steps are identified. However, no specific resurvey percentage (or reference as to where this may be found elsewhere in the document or its appendices) is provided for QC-2 and QC-3. Please provide the percentages to be resurveyed, a discussion of how they will be resurveyed, a discussion of how they will be determined, or a reference as to where these may be found elsewhere in the Dft GP 1 RI/FS WP, Seaside & Parker Flats MRAs, Phase II, or its appendices.</p> <p>Response: The three introductory bullets in Section 5.25 identifying the three sub-</p>

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		<p>elements were revised to identify the percentages for QC:</p> <p>QC-1: <i>Analog</i> verification of anomaly removal at 100% of the anomalies each anomaly selected for excavation.</p> <p>QC-2: Digital resurveying of an area greater than or equal to 16% of the DGM a percentage of the investigation areas.</p> <p>QC-3: Analog resurveying of at least 10% a percentage of each 100-ft by 100-ft grid.</p> <p>The three unnumbered subsections immediately following these bullets in Section 5.25 describe each of the sub-elements. These subsections have been updated to clarify percentages and area determination.</p>
13	EPA Specific Comment – Volume 2, Sampling and Analysis Plan, Appendix B, Parker Flats MRA Phase II – Types of MEC Removed and Hazard Classification, Page B-2	<p>Comment:</p> <p>The table lists an item as follows: “High explosive, 40 mm (model unknown).” It is unclear as to whether this is a cartridge or projectile. Please revise the entry to provide this information, if available.</p> <p>Response:</p> <p>This information was obtained from the Army’s database. Based on a similar comment provided by the EPA on the Draft SEDR, the following footnote has been added to the table: “<i>Munitions descriptions have been taken directly from the Army’s MMRP Database and/or other historical documents. Any errors in terminology, filler type, and/or discrepancies between model number and caliber/size are a result of misinformation from the data sources.</i>”</p>

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Review Comments provided by Gail Youngblood of the Army, dated June 30, 2008

No.	Comment Type / Report Section	Comment/Response
1	Army Specific Comment, P.1-3, Section 1.3.1, last paragraph	<p>Comment: The last sentence should be revised to clarify that the consultations resulted in biological opinions (BOs) that allow impacts to and incidental take of listed species during MEC remedial activities but require mitigation measures to be implemented during the munitions response activities to reduce and minimize impacts to the protected species and their habitats.</p> <p>Response: A sentence has been added to the end of the paragraph to provide clarification: "To remain consistent with the federal Endangered Species Act (ESA), the Army has completed consultations with the United States Fish and Wildlife Service (FWS) on the Army's predisposal actions, including cleanup of MEC. These consultations have resulted in biological opinions (BOs) that include endangered species incidental take permits. <i>These permits allow impacts to and incidental take of listed species during MEC cleanup activities, but require mitigation measures to be implemented during the MEC cleanup activities to reduce and minimize impacts to the protected species and their habitats.</i>"</p>
2	Army Specific Comment, p.2-5, Section 2.3.2 Future Land Use	<p>Comment: In addition to the 1997 Fort Ord Base Reuse Plan, the 2002 <i>Assessment East Garrison – Parker Flats Land Use Modifications</i> is applicable and should be introduced in this section.</p> <p>Response: The following text has been added to Section 2.3.2 regarding the future land use for the Seaside and Parker Flats MRAs: <i>"The future land uses are primarily based upon the Fort Ord Base Reuse Plan, adopted by FORA on June 13, 1997 (FORA 1997). Other sources of future land use information include public benefit conveyance, negotiated sale requests, transfer documents, the Installation-Wide Multispecies Habitat Management Plan (HMP; USACE 1997), and the Assessment East Garrison – Parker Flats Land Use Modifications, Fort Ord, California (Zander 2002)."</i></p>
3	Army Specific Comment, p.3-1, Section 3.2 Parker Flats MRA Phase II Evaluation	<p>Comment: There is a 1.1-acre portion of MRS-13B that overlaps parcel E19a.2. This area was called "MRS-13B Habitat Reserve" in the Final Track 2 Munitions Response RI/FS for the Parker Flats MRA (Phase I). No MEC item was recovered from the MRS-13B Habitat Reserve during the subsurface MEC removal that was previously conducted. Remedial investigation and risk assessment for this area are complete and documented in the final Track 2 RI/FS report. However, as described in the feasibility study (FS), Section 2.1.1 Assessment of Reuse Areas for FS Analysis, this area was not included in the FS (therefore the subsequent Proposed Plan) due to its small size. A</p>

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		<p>decision was made that an evaluation of remedial alternatives (if response is required) for the MRS-13B Habitat Reserve should be conducted when the rest of the habitat reserve property (E19a.2) is evaluated in an RI/FS and ROD. Please reflect this information and include the MRS-13B Habitat Reserve Reuse Area in the Group 1 FS.</p> <p>Response: The 1.1-acre portion of MRS-13B that extends into the Habitat Reserve area of the Parker Flats MRA Phase II will be included in the FS analysis conducted as part of the Group 1 RI/FS.</p>
4	Army Specific Comment, p.4-5, Section 4.4 RQA Pilot Study	<p>Comment: Please state whether this pilot study is intended to satisfy the requirement of the ESCA for a RQA pilot study.</p> <p>Response: The text has been revised as follows: “In an effort to satisfy regulatory concerns, a QA process the RQA process was developed that will to allow the regulators to gain comfort with the acceptability of a parcel, where MEC removal was conducted, for residential use (and other sensitive uses). <i>As specified in the ESCA, FORA and their response contractor were tasked to develop an RQA Pilot Study, which includes recommending areas for inclusion in the study and developing success criteria to be used by EPA and DTSC to determine if and when the RQA process will be applied to other designated residential parcels covered by the ESCA. This effort is also intended to satisfy the requirements of the ESCA for an RQA pilot study.</i> The relevance and usefulness of the RQA process will be tested in the RQA Pilot Study. The results of the Pilot Study will be considered in developing and evaluating remedial alternatives in the FS.”</p>
5	Army Specific Comment, p.4-6, Section 4.5.2 Parker Flats MRA Phase II	<p>Comment: To reduce potential confusion, please clarify that “non-residential” means non-residential development, and does not include habitat reserve. Please also consider “habitat reserve” as a land use category name since “habitat reserve” was used in Volume 2, Section 2.1 and Figure A-1.</p> <p>Response: The text has been revised to state “Residential and Non-Residential <i>Development</i> Areas” and “Habitat <i>Reserve</i> Areas.”</p>

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6	Army Specific Comment, p.4-7, Section 4.5.2 Parker Flats MRA Phase II, last paragraph	<p>Comment: This section describes that the surface sweep will involve investigation of shallow anomalies within 3 inches. Please describe if deeper anomalies that are not completely investigated will be documented. Same comment applies to Volume 2, p.2-2, Section 2.2.1.</p> <p>Response: This work plan does not contain specific criteria that will be used to determine whether intrusive investigation will be initiated. Therefore, Section 4.5.2 of Volume 1 has been revised as follows to clarify the approach:</p> <p>“The purpose of the surface sweep in the habitat <i>reserve</i> areas will be to identify and remove anomalies that are on or near the surface (within 3 inches). <i>Surface and near-surface finds (MEC and MD) will be fully documented and reviewed by the ESCA RP Team in consultation with the regulatory agencies during the investigation. If the ESCA RP Team in consultation with the regulatory agencies feel that significant near-subsurface MEC (either high concentration or high-risk unexploded ordnance) has been discovered during the investigation, a field variance will be developed to change the investigation approach to include a focused intrusive investigation the immediate vicinity may be intrusively investigated to ascertain the limits of the condition.</i>”</p>
7	Army Specific Comment, p.4-11, Section 4.10 Community Relations, first paragraph	<p>Comment: The Community Involvement and Outreach Program (CIOP) Plan does not amend the Fort Ord Community Relations Plan; however, it is an enhancement to this existing plan. Please revise the sentence as follows: “The CIOP Plan is an addendum to the Army’s former Fort Ord Community Relations Plan.” Please also see the Army’s comments to similar text that appeared in Draft CIOP Plan.</p> <p>Response: The text has been revised to state that the CIOP Plan is an <i>addendum</i> to the Army’s former Fort Ord Community Relations Plan.</p>
8	Army Specific Comment, p.4-12, Section 4.10.3	<p>Comment: a. Bullet 1. It is indicated “all CSUMB faculty, staff, and students residing in campus housing will receive a copy of the newsletter while school is in session.” should be re-evaluated. Suggestion to instead describe the actions that FORA and/or the ESCA RP Team will take to reach out to the CSUMB. b. Bullet 1. It is indicated that the FORA newsletters will be posted on the Army’s Fort Ord cleanup website. It would be more accurate to state that FORA newsletters that are posted on FORA’s website are available by hyperlink to FORA’s website from</p>

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		<p>www.fortordcleanup.com/community/factsheets.asp.</p> <p>c. Bullet 5. It is indicated that FORA factsheets will be included into the Information Repositories. Information Repositories are maintained by the Army and typically does not include factsheets. Please revise the text to the effect.</p> <p>d. Bullet 8. The text as written can be mis-interpreted as suggesting that FORA and/or the ESCA RP Team is maintaining the Fort Ord Administrative Record and the Information Repositories. Please revise the text to the effect that FORA and/or the ESCA RP Team will submit RI-related documents to the Army for inclusion in the Administrative Record.</p> <p>Response:</p> <p>a and b. The text in the first bullet has been revised as follows to address comments a and b:</p> <ul style="list-style-type: none"> Publish articles in the quarterly newsletter. Newsletters will be mailed to all interested parties in adjacent communities. Additional interested parties on the FORA ESCA RP mailing list will also receive the newsletters. The newsletters will also be posted on the FORA ESCA RP website (http://www.fora.org) and <i>a link to newsletters will be provided on the Army's Fort Ord Cleanup website (www.fortordcleanup.com www.fortordcleanup.com/community/factsheets.asp). FORA will work with representatives of CSUMB to ensure they are kept apprised of all ESCA-related cleanup activities and have access to relevant information about the ESCA RP. Information about the FORA ESCA RP website will be made available to representatives of CSUMB allowing them to notify their students, staff, and faculty, as appropriate. Special emphasis will be placed on coordinating with the university concerning when field construction work will affect access routes, CSUMB cross country trails, and other campus sponsored activities. FORA will also participate in CSUMB outreach activities as appropriate.</i> <p>c. The fifth bullet has been revised as follows:</p> <ul style="list-style-type: none"> Publish a fact sheet distributed by direct mail to local residents, community leaders, minority community organizations, and those who have requested to be on the CIOP mailing list. Fact sheets will also be posted on the FORA ESCA RP website, on the Fort Ord Cleanup website, in the Information repositories, and at community involvement activities. <p>d. The last bullet has been revised as follows:</p> <ul style="list-style-type: none"> Maintain <i>Provide copies of RI-related documents to the Army for inclusion in the Army-maintained</i> Information Repositories and

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		Administrative Record to include RI-related documents.
9	Army Specific Comment, p.5-1. Section 5.2 Task 2 Community Relations	<p>Comment: The last two sentences indicate that the Army's previous versions of Community Relations Plans (CRPs) have been superseded by the current CIOP Plan and the CRP Update Number 3. To clarify, please revise the text to read "The MEC-related community relations programs implemented at the former Fort Ord have been described in the CRP (Army 1998), the CRP Update Number 1 (Army 2000), the CRP Update Number 2 (Army 2001) and the CRP Update Number 3 (Army, 2006). The CIOP Plan is an addendum to the Army's former Fort Ord CRP."</p> <p>Response: The paragraph has been revised as follows: "Task 2 includes the efforts related to the preparation and implementation of the CIOP Plan (ESCA RP Team 2008b). Community relations activities serve to keep stakeholders informed of activities at the former Fort Ord and help the supporting agencies respond to community concerns. The previous MEC-related community relations programs implemented at the former Fort Ord were described in the CRP (Army 1998), the CRP Update Number 1 (Army 2000), and the CRP Update Number 2 (Army 2001). These plans have been superseded by the current CIOP Plan and the CRP Update Number 3 (Army 2006). <i>The MEC-related community relations programs implemented at the former Fort Ord have been described in the CRP (Army 1998), the CRP Update Number 1 (Army 2000), the CRP Update Number 2 (Army 2001), and the CRP Update Number 3 (Army 2006). The CIOP Plan is an addendum to the Army's former Fort Ord CRP.</i>"</p>
10	Army Specific Comment, p.5-2, Section 5.5 Task 5 Data Evaluation	<p>Comment: This section indicates that the results of this task will be presented to stakeholders prior to proceeding to the risk assessment. Please describe how this coordination will be accomplished.</p> <p>Response: The section has been revised as follows: "Task 5 includes refining and updating the CSMs for Group 1 to document additional site characterization results, including physical characteristics, MEC source characteristics, and the nature and extent of contamination in accordance with Task 4.1 of the AOC. The results of this task will be presented to <i>state and federal regulators and the Army during regularly scheduled monthly meetings prior to proceeding to the risk assessment. Community stakeholders will be apprised of any changes to the CSM and their potential impacts by way of the most appropriate and timely method</i></p>

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		<i>(e.g., Community Involvement Workshop meeting, ESCA Community meeting, ESCA newsletter, and/or ESCA Fact Sheet).</i> stakeholders prior to proceeding to the risk assessment.
11	Army Specific Comment, p.5-2, Section 5.6 Task 6 Risk Assessment	<p>Comment: This section indicates that the results of this task will be presented to stakeholders prior to proceeding to the development of alternatives. Please describe how this coordination will be accomplished.</p> <p>Response: The last paragraph of this section has been revised as follows: “The main purpose of the risk evaluation portion of the Group 1 RI/FS is to provide an estimate of the risks posed by site conditions (i.e., MEC) and to assess whether a past (or planned) removal or remedial action at a site was (or will be) effective in reducing those risks. The results of this task will be presented to stakeholders community stakeholders at a community meeting on the Draft RI/FS report.”</p>
12	Army Specific Comment, Table 1 Potential Applicable or Relevant and Appropriate Requirements (ARARs)	<p>Comment: Please review the “remarks” column so that they address the planned/anticipated CERCLA actions for the Group 1 MRAs.</p> <p>Response: The ARARs table was provided to show the list of potential ARARs considered for the Group 1 RI/FS. These potential ARARs will be further evaluated and refined during Task 10, Remedial Alternatives Evaluation. At this time the "Remarks" column has been revised to replace references to the Army.</p>
13		<p>Comment: Please include an acknowledgement of sponsorship pursuant to ESCA Section D.11.</p> <p>Response: The following statement has been added to the end of Section 1.0: “<i>This effort was sponsored by the Army, Assistant Chief of Staff Installation Management. The content of the information does not necessarily reflect the position or policy of the Government and no official endorsement should be inferred.</i>”</p>

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14	Army Specific Comment	<p>Comment: Please coordinate any outreach activities targeting the Department of Defense (DoD) communities that may be affected by the planned field investigation (Fitch and Marshall housing areas, DoD Center) and associated possible road closures with the BRAC Fort Ord Field Office. Our Point of Contact for this matter is Melissa Broadston at 831-393-1284.</p> <p>Response: Outreach activities targeting the DoD communities will be coordinated with Melissa Broadston (or other appropriate BRAC representative). No revisions have been made to the text in response to this comment.</p>
15	Army Specific Comment, p.1-1, Section 1.0. First paragraph	<p>Comment: Please replace the phrase “ordnance and explosives” with the more recent term “military munitions.”</p> <p>Response: The term “ordnance and explosives” has been replaced with the term “military munitions.”</p>
16	Army Specific Comment, p.1-2, Section 1.3.1	<p>Comment: Please see the Army’s comments to similar text that appeared in Draft Summary of Existing Data Report (SEDR), Section 2.2.</p> <p>Response: The text has been revised to reflect comments received on the Draft SEDR and incorporated into the Draft Final SEDR submitted in June 2008.</p>
17	Army Specific Comment, p.2-2, Section 2.2.1 Parker Flats MRA Phase II Remedial Investigation	<p>Comment: This section discusses that the investigation of residential and non-residential development areas will entail 100% digital geophysical investigation to the depth of detection. While the plan for structure removal was clarified in Appendix C: Building Demolition and Removal Plan, it is not clear how paved areas such as roads will be handled during the investigation. Please provide additional text to clarify.</p> <p>Response: Section 2.2.1 was revised as follows: “The investigation areas include property designated for future residential, nonresidential, or habitat reserve. <i>Improved roads will not be intrusively investigated.</i> Digital geophysical mapping (DGM) investigations, using the Best Available and Appropriate Detection Technology (BADT) will be performed in residential and nonresidential development areas. The investigation of residential and nonresidential development areas will entail 100 percent DGM investigations to the depth of detection. Areas that are not suitable for DGM (e.g., dense oak woodland where data collection is not</p>

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		possible) will be investigated using analog detection.”
18	Army Specific Comment, p.2-8, Section 2.3.5.1 Excavation of Digitally Reacquired Anomalies	<p>Comment: Fourth paragraph discusses inspecting discovered MEC items to confirm that it is MEC, MD or other scrap, and that MD and scrap will be transported offsite for disposal or recycling. Please also discuss whether MD will be inspected and certified free of explosives hazard before it is shipped offsite.</p> <p>Response: The following revisions have been made to the paragraph: “The MEC items located will be initially classified as materials potentially presenting an explosive hazard (MPPEH) until the items are fully inspected and can be identified as MEC, MD, or metal scrap. MD and metal scrap will be transported from the investigation area and stored until it can be disposed of by a foundry and/or recycler, where it will be processed through a smelter, shredder, or furnace prior to resale or release. <i>Prior to leaving the MRA, the MD and metal scrap will be inspected by a SUXOS and a UXOQCS to verify that it is free from explosives (FFE).</i> The MD will be shredded and recycled at an authorized recycler.”</p>
19	Army Specific Comment, p.5-21, Section 5.25 Geophysical QC Surveys, QC-2 Geophysical Resurveying	<p>Comment: The second paragraph discusses failure criteria of a discovery of an MEC or MEC-like item, or five re-acquirable anomalies. Please clarify whether this QC criteria is applied to each 100’ x 100’ grid, or to the entire footprint of geophysical investigation.</p> <p>Response: The second paragraph has been revised to clarify that the failure criteria is applied to each 100-ft by 100-ft grid or partial grid.</p>
20	Army Specific Comment, Section 7.0 Location Surveys and Mapping Plan	<p>Comment: It is our understanding that the ESCA RP Team is in the process of developing a procedure for migrating the munitions response data into the Army’s MMRP database, and that you have been coordinating this effort with our MMRP database manager. Please include this procedure into the final version of the Group 1 RI/FS Work Plan to ensure that necessary data is collected throughout the project and available for submission at the end of the project.</p> <p>Response: The following information has been added to Section 7.1: “<i>The Army has requested that FORA provide final MEC and MD finds, geophysical operations, and MEC demolition activity data. FORA and the Army are working together to identify the data needs to be provided in an agreed upon format. Data transfer from FORA to the Army will occur following the release of the associated final report.</i>”</p>

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21	Army Specific Comment	<p>Comment: Please include a procedure for handling a situation in which possible Army obligations, as defined in the ESCA, are discovered during the remedial investigation.</p> <p>Response: A discussion of Army-retained conditions and an outline for the notification procedures to be followed has been added as Section 2.7 of Volume 2 of the Group 1 RI/FS Work Plan. The text reads as follows:</p> <p><i>The ESCA and the AOC identify certain Army-retained conditions for which the Army assumes responsibility. If these conditions are encountered during field operations, FORA is required to notify the Army of their presence in accordance with the guidelines set forth in the ESCA and the Army assumes responsibility. Included in the Army-retained conditions are:</i></p> <ul style="list-style-type: none"> • <i>Radiological material</i> • <i>Chemical or biological warfare agents</i> • <i>Natural resource injuries or damages occurring as a result of contamination releases that have occurred due to Army ownership or activities on the MRA except to the extent such injuries are a direct result of FORA's activities on the MRA</i> • <i>Unknown uninsured conditions, which include the management and cleanup of non-MEC-related hazardous and toxic wastes above insurance parameters</i> • <i>Perchlorate contamination in soil or groundwater</i> <p><i>Recognition of these types of conditions in the field may include, but are not limited to:</i></p> <ul style="list-style-type: none"> • <i>oily, shiny, or saturated soil or free product</i> • <i>soil with strong chemical odor</i> • <i>discovery of objects of environmental concern such as underground storage tanks and associated piping, buried drums, etc.</i> • <i>discovery of suspected debris of environmental concern (i.e.,</i>

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		<p><i>buried refuse, asbestos-containing pipes, and Transite™)</i></p> <ul style="list-style-type: none"> • <i>other conditions that vary materially from those documented during previous investigations</i> • <i>discovery of areas containing high concentrations of spent ammunition</i> • <i>discovery of bulk explosives</i> <p><i>The field personnel involved in fieldwork activities will be briefed on the recognition of these types of conditions in the field and will be instructed to be on the alert for these conditions and to promptly report such conditions to the site manager, if encountered.</i></p> <p><i>If a suspected Army-retained condition is encountered during the field investigation activities, the following procedures will be followed:</i></p> <ol style="list-style-type: none"> 1. <i>All MEC field activities that may potentially disturb the “suspected” condition will be immediately stopped.</i> 2. <i>If there is no immediate danger to personnel, an appropriate exclusion zone will be designated with a marker and/or a barricade will be erected around the suspect area to prevent further soil disturbance in this area.</i> 3. <i>If an emergency situation requiring medical attention, containment assistance, or other emergency assistance arises, the emergency procedures specified in the Site Safety and Health Plan (SSHP) provided as Appendix J will be followed.</i> 4. <i>The site manager for the contractor or subcontractor will immediately notify the appropriate ESCA RP Team representative. The ESCA RP Team representative will notify the Army immediately, and FORA and the appropriate regulatory agencies within 24 hours.</i>
22	Army Specific Comment, p.12-5, Section 12.3.2.3	<p>Comment:</p> <p>a. Paragraph #2. The statement that excavated areas will be allowed to revegetate naturally applies to typical mag and dig operations. However, if excavations are larger and disturb more than one acre and more than 100 feet in width, then passive and active restoration with follow-up monitoring will be necessary. This will be evaluated on a case-by-case basis and coordinated with the Army BRAC Office.</p> <p>b. Last paragraph. The paragraph states that restoration monitoring will occur in accordance with Chapter 4 of the HMP. However, the requirement</p>

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		<p>to monitor vegetation in Habitat Reserve areas is described in Chapter 3 of the HMP.</p> <p>Response:</p> <p>a. The ESCA RP Team agrees with the Army that natural revegetation applies to typical mag and dig operations as well as digital mapping operations (DGM) operations, which are both being conducted at the Parker Flats MRA Phase II under the Group 1 RI/FS Work Plan. Although the ESCA RP Team does not anticipate conducting excavations that will disturb an area more than one acre and more than 100 feet in width, passive and active restoration with follow-up monitoring will be conducted in accordance with the procedures described in the Habitat Restoration Plan prepared for the Site 39 Inland Ranges. The text has been revised as follows:</p> <p><i>“Per the HMP, excavated areas will be allowed to revegetate naturally. If the excavation disturbs an area more than one acre and more than 100 feet in width, passive and active restoration with follow-up monitoring will be conducted in accordance with the procedures described in the Habitat Restoration Plan prepared for the Site 39 Inland Ranges (Denise Duffy & Associates 2008).”</i></p> <p>b. The text has been revised to state that vegetation monitoring will occur in accordance with Chapter 3 of the HMP.</p>
23	Army Specific Comment, Appendix D: Standard Operating Procedures	<p>Comment:</p> <p>Standard Operating Procedure for MEC with Unknown Filler. Section 5.1 General. Bullet 7 indicates that the standard reporting procedure is for FORA to contact the Presidio of Monterey Police Department (POMPD) who will notify the Technical Escort Unit (TEU). After the property is transferred to FORA, the standard procedure for such notification should be from FORA to local law enforcement agency to the EOD unit assigned to the region. If the EOD unit determines that a response by TEU is needed, it would complete such notification. In addition, FORA should notify the POMPD and the BRAC Fort Ord Field Office when it notifies the local law enforcement agency.</p> <p>Response:</p> <p>The SOP has been revised to reflect the notification procedure to be followed after land transfer in the event MEC with unknown filler is found.</p>
24	Army Specific Comment, Appendix F: Residential Quality	<p>Comment:</p> <p>Section F-2.1 RQA Pilot Study Test Areas. It is our understanding that the test area RQA-2 contains a portion that may not be developed for residential use (a portion of Parcel E18.1.1, a part of the veterans cemetery project). Please re-assess the suitability of this site for RQA pilot study</p>

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	Assurance Pilot Study Work Plan	<p>implementation given the uncertainty in the future use.</p> <p>Response: The RQA-2 area and the RQA-1 area have been removed from the work plan as these areas may not be developed for residential use. The area planned for residential use in the CSUMB MRA has been added to the work plan to replace the RQA-1 and RQA-2 areas in the RQA Pilot Study. The Executive Summary presented in Volume 1, applicable sections of Volume 2, and Appendix F of Volume 2 have been revised to reflect this change in scope.</p>
25	Army Specific Comment, Appendix F: Residential Quality Assurance Pilot Study Work Plan	<p>Comment: The Army will provide additional review comments on the Residential Quality Assurance Pilot Study Work Plan after regulatory agencies provide their inputs.</p> <p>Response: No additional comments have been received to date.</p>
26	Army Specific Comment, Table 5-1, Recovery and Penetration Depths of MEC Previously Encountered in Parker Flats MRA Phase II	<p>Comment: One of the footnotes describes MRA as "Munitions Response Site." Please correct this to "Munitions Response Area."</p> <p>Response: The footnote description has been changed to "<i>Munitions Response Area</i>".</p>
27	Army Specific Comment, Appendix B: MEC Data	<p>Comment: The Hazard Classification table describes hazard classification 0 as "Inert MEC that will cause no injury." By definition MEC is explosive in nature, therefore category 0 or "inert" classification is not possible for a MEC item. Classification 0 should be described as "inert munitions item that will cause no injury" instead.</p> <p>Response: The description for hazard classification 0 has been revised to read "<i>inert munitions item that will cause no injury.</i>"</p>
28	Army Specific Comment, Appendix F: Residential Quality	<p>Comment: The legend describes hazard classification 0 as "Inert MEC that will cause no injury." By definition MEC is explosive in nature, therefore "inert" classification is not possible for a MEC item. Classification 0 should be described as "inert munitions item that will cause no injury" instead.</p>

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No.	Comment Type / Report Section	Comment/Response
	Assurance Pilot Study Work Plan. Figure F-2	Response: The figure has been revised to read “ <i>inert munitions item that will cause no injury.</i> ”
29	Army Specific Comment, Appendix I: Explosives Siting Plan. Section 1.6.1	Comment: Detonation Site Blow-In Place. The second to the last bullet discusses that after property transfer, fire risk assessment for planned detonations will be conducted by the City of Seaside Fire Department. Please verify if this is the case since the majority of the investigation area is within the jurisdiction of the Monterey County. Response: The second to the last bullet in Section 1.6.1 of Appendix I has been revised as follows: <ul style="list-style-type: none"> • “Request Presidio of Monterey Fire Department (POM FD) to perform an on-site fire risk assessment. For planned detonations, risk assessments require a 3-day notification and demolition shots require a 5-day notification. POM FD will expedite risk assessments for demolition shots that cannot be delayed. Following property transfer, requirements for risk assessments will be determined by the City of Seaside Fire Department, <i>if the detonation is being conducted within the jurisdiction of the City of Seaside, or by the Salinas Rural Fire District, if the detonation is being conducted within the jurisdiction of Monterey County.</i>”
30	Army Specific Comment, Appendix J: Site Safety and Health Plan. Section J-12.4	Comment: Offsite Emergency Response Services. Table J-6 Emergency Contacts lists City of Seaside police and fire agencies. Please verify whether Monterey County law enforcement and fire agencies need to be identified, since the majority of the investigation area is within the jurisdiction of the Monterey County. Response: The following contact information has been added to Table J-6: Emergency Contacts: <p style="text-align: right;"> <i>Salinas Rural Fire District (831) 455-1828</i> <i>Monterey County Sheriff (831) 755-3801</i> </p>

Response to Comments

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Response to Comments

DRAFT Group 1 Remedial Investigation / Feasibility Study Work Plan, dated May 23, 2008
 Review Comments provided by Marina Equestrian Association, dated September 24, 2008

No.	Comment Type / Report Section	Comment/Response
a.	Specific Comment	<p>Comment:</p> <p>We ask that FORA consider opening the Parker Flats MRA as soon as field work is completed and dangers have been removed. Opening the site while paperwork is completed would reduce the time and burden of lost access and continue our present public uses more quickly.</p> <p>Response:</p> <p>FORA will work with the regulatory agencies with respect to the Marina Equestrian Association's request to gain access to the Parker Flats MRA as soon as possible following the completion of the fieldwork effort and regulatory documentation and approval.</p>
b.	Specific Comment	<p>Comment:</p> <p>Equestrian use should be added to paragraph 2.3.1 as a daily recreational user.</p> <p>Response:</p> <p>Equestrian use has been added to paragraph 2.3.1.</p>
c.	Specific Comment	<p>Comment:</p> <p>Equestrian use should be included in paragraphs 2.3.1 and 2.3.2 for past, current and future land use.</p> <p>Response:</p> <p>Equestrian use has been added to paragraphs 2.3.1 and 2.3.2 as past, current and future land users.</p>
d.	Specific Comment	<p>Comment:</p> <p>We wish to provide testimony that current recreational uses of the Parker Flats MRA are not conflicting and all should be accommodated after remediation. These daily recreational users are hikers, joggers, bikers, dog walkers and horse riders.</p> <p>Response:</p> <p>FORA will work with the regulatory agencies with respect to the Marina Equestrian Association's request to gain access to the Parker Flats MRA as soon as possible following the completion of the fieldwork effort and</p>

Response to Comments

DRAFT Group 1 Remedial Investigation / Feasibility Study Work Plan, dated May 23, 2008
 Review Comments provided by Marina Equestrian Association, dated September 24, 2008

No.	Comment Type / Report Section	Comment/Response
		regulatory documentation and approval. In addition, joggers, dog walkers and horse riders have been added to the list of daily recreational users in the Parker Flats MRA
e.	Specific Comment	<p>Comment:</p> <p>We ask to have the Marina Equestrian Center acknowledged, where appropriate, as an historic and future source of users to this area due to its close proximity to Parker Flats and its unique connection to the National Park Service.</p> <p>Response:</p> <p>The Marina Equestrian Center will be referenced as a historic and future source of users to the area in the Remedial Investigation/Feasibility Study report to be prepared following the completion of the fieldwork efforts.</p>



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

July 09, 2008

Mr. Stan Cook
Fort Ord Reuse Authority
100 12th Street, Building 2880
Marina, CA 93933

Re: EPA comments on the Draft Group 1 Remedial Investigation/Feasibility Study Work Plan, Seaside Munitions Response Area and Parker Flats Munitions Response Area Phase II, dated May 23, 2008

Dear Stan:

Attached are EPA's comments on the *Draft Group 1 Remedial Investigation/Feasibility Study Work Plan, Seaside Munitions Response Area and Parker Flats Munitions Response Area Phase II*, dated May 23, 2008

If you have any questions, please do not hesitate to call me at (415) 972-3681 or e-mail me at huang.judy@epa.gov.

Sincerely,

A handwritten signature in black ink, reading "Judy C. Huang", is positioned below the word "Sincerely,".

Judy C. Huang, P.E.
Remedial Project Manager

cc:

Dan Ward (DTSC)
Site Mitigation/Office of Military Facilities
8800 Cal Center Drive
Sacramento, CA 95826

Roman Racca (DTSC)
Site Mitigation/Office of Military Facilities
8800 Cal Center Drive
Sacramento, CA 95826

Kristie Reimer, AICP
Principal Planner
BRAC / Federal Programs
LFR Inc.
1900 Powell Street, 12th Floor
Emeryville, CA 94608

Ms. Gail Youngblood
Fort Ord Base Realignment and Closure Office
P.O. Box 5008
Monterey, CA 93944-5004

Mr. Thomas Hall (via E-mail)

**REVIEW OF THE
DRAFT GROUP 1
REMEDIAL INVESTIGATION/FEASIBILITY STUDY WORK PLAN
SEASIDE MUNITIONS RESPONSE AREA
AND
PARKER FLATS MUNITIONS RESPONSE AREA
PHASE II
FORMER FORT ORD, CALIFORNIA
MAY 23, 2008**

GENERAL COMMENTS

1. The Draft Group 1 Remedial Investigation/Feasibility Study Work Plan, Seaside Munitions Response Area and Parker Flats Munitions Response Area Phase II, dated May 23, 2008, (hereinafter referred to as the Dft GP 1 RI/FS WP, Seaside & Parker Flats MRAs, Phase II), presents the Quality Control (QC) process to be used during the execution of the RI/FS in a fragmented manner. It is understood that some of this fragmentation is due to the format of the document that is prescribed by the RI/FS requirements. However, there is no identifiable portion of the document or its appendices that contains a listing of all of the activities to be evaluated by QC, the evaluation criteria for each activity evaluated, and the associated pass/fail criteria. A listing of this information would be very valuable for use during the execution of the work plan and would assist those evaluating the quality of these processes in their efforts. Please provide a table/chart that provides this information in an appropriate location in the body of the Dft GP 1 RI/FS WP, Seaside & Parker Flats MRAs, Phase II.
2. The Dft GP 1 RI/FS WP, Seaside & Parker Flats MRAs, Phase II, refers to a number of teams throughout the document and its appendices. In most instances, the makeup of these teams is not provided. Some of the teams listed include: Excavation Team, UXO Team, UXO Intrusive Team, Brush Cutting Team, Geophysical Team, Chipper Team, Reacquisition Team, Dig Team, Field Team, Mechanical Vegetation Cutting Team, and ESCA RP Team. Some of these teams are defined by function and makeup in the document, but most are not. Please review the teams listed in the Dft GP 1 RI/FS WP, Seaside & Parker Flats MRAs, Phase II, and define the function and makeup of each team when first introduced in the text or at another appropriate location that may be referenced at the first introduction of the team in the text.

SPECIFIC COMMENTS

EXECUTIVE SUMMARY

1. **Sampling and Analysis Plan (Volume 2), Page xv:** The next-to-last sentence in the third paragraph of this section on page xv, in referring to the results of the surface sweep, states that, "If significant subsurface MEC (either high concentration or high risk unexploded ordnance) are discovered during the investigation, the immediate vicinity may be intrusively investigated to ascertain the limits of the condition." The use of the

word “may” in this sentence raises a concern as to the criteria that will make this further investigation obligatory. Please revise the cited section of the Executive Summary to state the specific criteria that will be used to determine whether the noted intrusive investigation will be initiated, or reference where this information may be found elsewhere in the document or its appendices.

VOLUME 1 – WORK PLAN

- 2. Section 4.7, Explosives Safety Risk Assessment, Page 4-7:** The last sentence of the first paragraph of this section states that, “Rather, it relies on an assumption that any encounter with MEC will result in an adverse effect, and provides a qualitative description of the explosives safety risk, based on the likelihood of encountering a MEC item combined with the potential of the item to cause a serious injury if detonated.” While many of the munitions items that may be found on the sites of concern can detonate, some are items that do not detonate, but burn or eject pyrotechnic cargoes that burn when they function. Based on this differing results of a munitions item functioning due to stimulus from a personal encounter, a better description of the results would be achieved if the words “it functions” replaced the word “detonated” in the cited sentence. Please make this correction here and elsewhere as appropriate in the Dft GP 1 RI/FS WP, Seaside & Parker Flats MRAs, Phase II.
- 3. Appendix A, Seaside MRA Conceptual Site Model, Section 4.1.3, Historical Military Use, Page 4-2:** The last sentence in this section notes that, “It is expected that munitions activity associated with these ranges would have occurred within the firing points.” This statement may not be accurate, depending on the definition applied to the term “munitions activity.” Please revise this section to include a description of what constitutes “munitions activity,” or expand it to better explain the intent of the cited sentence.
- 4. Appendix A, Seaside MRA Conceptual Site Model, Section 4.6, Seaside MRA Pathway Analysis, Page 4-11:** This section presents a general discussion of the potential exposure pathways from munitions items that may currently be present on the Seaside MRA. The results of this analysis are referenced as presented in Table 4.6-1, Seaside MRA – Potential Receptors and Exposure Media. The potential receptors listed include Construction Workers, Utility Workers, Trespassers, Firefighters, Emergency Response Workers, Ancillary Workers, Residents, and Recreational Users. The table divides these receptors into two categories, which are Current and Future. The Exposure Media listed is Ground Surface and Below Grade.

None of the potential receptors are listed as being potentially exposed to MEC present on the ground surface, either in the Current or Future periods. Also, only the Construction Workers, Utility Workers, Firefighters, and Residents are identified as being potentially exposed to MEC present in the subsurface. The Trespassers, Emergency Response Workers, Ancillary Workers, and Recreational Users are listed as having no potential exposure to MEC present on the Ground Surface or in the Subsurface during either time

period. No details as to how these determinations were made are provided in the cited section.

No MEC removal action short of complete excavation and removal (or screening) of the soil to the potential penetration depths of the munitions used will provide a complete assurance that no MEC remains on the site so treated. Based on this fact, the presence of MEC on and beneath the surface of the Seaside MRA cannot be ruled out, both before and after surface and subsurface removals have been conducted. Therefore, any person entering the site has the potential to contact MEC on the surface, and any person conducting any intrusive activity on the site has the potential to contact subsurface MEC, both prior to and after the removal actions have been completed.

Please review the cited section and table and revise them as necessary to present the correct exposure potential for the listed receptors.

5. **Appendix A, Seaside MRA Conceptual Site Model, Table 4.1-4, Seaside MRA – Historical Military Use, Page 4-17:** In the row entitled “Range 23M,” the second bullet in the Description column lists “Dragon rounds” as having been found on this range. As “Dragon rounds” would be an unfired missile, this is highly unlikely. Please review the cited table and correct it as necessary.
6. **Appendix A, Seaside MRA Conceptual Site Model, Figure 4.6-1, Seaside MRA Pathway Analysis Flowchart:** In the column entitled “Expected MEC Contamination,” some of the boxes in the column list “MD” as a possible component. As MD is not a subcomponent of MEC, this is technically an incorrect usage. Either the column heading should be revised to replace the term “MEC” or the MD should be removed from the noted boxes in the column. Please correct this as needed.

In addition, the column entitled “Secondary Sources” lists both Ground Surface and Below Grade as the initial media contaminated by MEC. However, the Ground Surface source is not continued to completion on the flowchart, as is the case with the Below Grade category. Please complete the evaluation of this source in the flowchart.

7. **Appendix B, Parker Flats MRA Conceptual Site Model, Section 5.6, Parker Flats MRA Pathway Analysis, Page 5-10:** This section presents a general discussion of the potential exposure pathways from munitions items that may currently be present on the Parker Flats MRA. The results of this analysis are referenced as presented in Table 5.6-1, Parker Flats MRA – Potential Receptors and Exposure Media. The potential receptors listed include Construction Workers, Utility Workers, Trespassers, Firefighters, Emergency Response Workers, Ancillary Workers, Residents, and Recreational Users. The table divides these receptors into two categories, which are Current and Future. The Exposure Media listed is Ground Surface and Below Grade.

With the exception of Emergency Response Workers and Residents, all of the potential receptors are listed as being potentially exposed to MEC present on the ground surface, either in the Current or Future periods. An exception is the Recreational User, who is not listed for the Current period. Also, the Trespassers, Emergency Response Workers, Ancillary Workers, and Recreational Users are identified as not being potentially exposed to MEC present in the subsurface. Only the Emergency Response Workers are listed as having no potential exposure to MEC present on the Ground Surface or in the Subsurface during either time period. No details as to how these determinations were made are provided in the cited section.

As has previously been noted, no MEC removal action short of complete excavation and removal (or screening) of the soil to the potential penetration depths of the munitions used will provide a complete assurance that no MEC remains on the site so treated. Based on this fact, the presence of MEC on and beneath the surface of the Seaside MRA cannot be ruled out, both before and after surface and subsurface removals have been conducted. Therefore, any person entering the site has the potential to contact MEC on the surface, and any person conducting any intrusive activity on the site has the potential to contact subsurface MEC, both prior to and after the removal actions have been completed.

Please review the cited section and table and revise them as necessary to present the correct exposure potential for the listed receptors.

8. Appendix B, Parker Flats MRA Conceptual Site Model, Table 5.3-2, Parker Flats MRA Phase II – Removal Activities, Page 5-22: In the row entitled “MRS-15MOCO.2,” the fourth bullet in the Summary column has a sentence that states, “This operation identified areas [or an area? areas is correct] of obstructions/interferences such as asphalt, and material from the Range 45 pad, or telephone poles as SCA (Parsons 2004b).” Either this sentence is very poorly constructed or editorial comments have not been expunged from the table. Please review this table and correct it as necessary.

9. Appendix B, Parker Flats MRA Conceptual Site Model, Figure 5.6-1, Parker Flats MRA Pathway Analysis Flowchart: In the column entitled “Expected MEC Contamination,” the box in the column list “MD” as a possible component. As MD is not a subcomponent of MEC, this is technically an incorrect usage. Either the column heading should be revised to replace the term “MEC” or the MD should be removed from the noted box in the column. Please correct this as needed.

In addition, the column entitled “Secondary Sources” only lists Below Grade as the initial media contaminated by MEC. However, the Ground Surface source is discussed in Section 5.6.1, Exposure Pathways, and is also referenced in Table 5.6-1, Parker Flats MRA – Potential Receptors and Exposure Media. Please provide an evaluation of this source in the flowchart.

VOLUME 2 – SAMPLING AND ANALYSIS PLAN

- 10. Section 2.2.1, Parker Flats MRA-Phase II Remedial Investigation, Page 2-2:** The last sentence in the third paragraph of this section, in referring to the results of the surface sweep, states that, “If significant subsurface MEC (either high concentration or high risk unexploded ordnance [UXO]) are discovered during the investigation, the immediate vicinity may be intrusively investigated to ascertain the limits of the condition.” The use of the word “may” in this sentence raises a concern as to the criteria that will make this further investigation obligatory. Please revise the cited section to state the specific criteria that will be used to determine whether the noted intrusive investigation will be initiated, or reference where this information may be found elsewhere in the document or its appendices.
- 11. Section 2.3.5.1, Excavation of Digitally Reacquired Anomalies, Page 2-9:** The last sentence in this section states, “If MEC are encountered that are suspected of containing unknown filler, MEC extinction will be conducted in accordance with the SOP for MEC with Unknown Filler presented in Appendix D of this G1SAP.” Please explain the reason for the use of the word “extinction” in this sentence and what it entails.
- 12. Section 5.25, Geophysical QC Surveys, Page 5-19:** In the three sub-elements (QC-1, QC-2, and QC-3) of the first paragraph of the section, the basic concepts of these three QC steps are identified. However, no specific resurvey percentage (or reference as to where this may be found elsewhere in the document or its appendices) is provided for QC-2 and QC-3. Please provide the percentages to be resurveyed, a discussion of how they will be determined, or a reference as to where these may be found elsewhere in the Dft GP 1 RI/FS WP, Seaside & Parker Flats MRAs, Phase II, or its appendices.
- 13. Appendix B, Parker Flats MRA Phase II – Types of MEC Removed and Hazard Classification, Page B-2:** The table lists an item as follows: “High explosive, 40mm (model unknown).” It is unclear as to whether this is a cartridge or a projectile. Please revise the entry to provide this information, if available.



DEPARTMENT OF THE ARMY
FORT ORD OFFICE, ARMY BASE REALIGNMENT AND CLOSURE
P.O. BOX 5008, BUILDING #4463 GIGLING ROAD
MONTEREY, CALIFORNIA 93944-5008

ESCA-0085
ESCA AR

JUN 30 2008

REPLY TO
ATTENTION OF

Base Realignment and Closure

Stan Cook
ESCA Remediation Program Manager
Fort Ord Reuse Authority
100 12th Street
Marina, CA 93933

Subject: *Draft Group 1 Remedial Investigation/Feasibility Study (RI/FS) Work Plan, Volume 1-Work Plan and Volume 2-Sampling and Analysis Plan*, dated May 23, 2008, received on May 29, 2008.

Dear Mr. Cook:

Thank you for an opportunity to review and comment on the subject document. The Army's comments are enclosed. Please note our comments are focused on "big picture" issues such as the consistency with documents previously produced under the Army's cleanup program. A copy of this letter will be furnished to U.S. Environmental Protection Agency (Judy Huang) and California Department of Toxic Substances Control (Roman Racca).

Sincerely,

Gail Youngblood
BRAC Environmental Coordinator
Fort Ord Field Office

Enclosure

DRAFT Group 1 Remedial Investigation/Feasibility Study (RI/FS) Work Plan, Seaside Munitions Response Area (MRA) and Parker Flats MRA Phase II, Volume 1

Army Comments:

1. P.1-3, Section 1.3.1, last paragraph. The last sentence should be revised to clarify that the consultations resulted in biological opinions (BOs) that allow impacts to and incidental take of listed species during MEC remedial activities but require mitigation measures to be implemented during the munitions response activities to reduce and minimize impacts to the protected species and their habitats.
2. p.2-5, Section 2.3.2 Future Land Use. In addition to the 1997 Fort Ord Base Reuse Plan, the 2002 *Assessment East Garrison – Parker Flats Land Use Modifications* is applicable and should be introduced in this section.
3. p.3-1, Section 3.2 Parker Flats MRA Phase II Evaluation. There is a 1.1-acre portion of MRS-13B that overlaps parcel E19a.2. This area was called “MRS-13B Habitat Reserve” in the Final Track 2 Munitions Response RI/FS for the Parker Flats MRA (Phase I). No MEC item was recovered from the MRS-13B Habitat Reserve during the subsurface MEC removal that was previously conducted. Remedial investigation and risk assessment for this area are complete and documented in the final Track 2 RI/FS report. However, as described in the feasibility study (FS), Section 2.1.1 Assessment of Reuse Areas for FS Analysis, this area was not included in the FS (therefore the subsequent Proposed Plan) due to its small size. A decision was made that an evaluation of remedial alternatives (if response is required) for the MRS-13B Habitat Reserve should be conducted when the rest of the habitat reserve property (E19a.2) is evaluated in an RI/FS and ROD. Please reflect this information and include the MRS-13B Habitat Reserve Reuse Area in the Group 1 FS.
4. p.4-5, Section 4.4 RQA Pilot Study. Please state whether this pilot study is intended to satisfy the requirement of the ESCA for a RQA pilot study.
5. p.4-6, Section 4.5.2 Parker Flats MRA Phase II. To reduce potential confusion, please clarify that “non-residential” means non-residential development, and does not include habitat reserve. Please also consider “habitat reserve” as a land use category name since “habitat reserve” was used in Volume 2, Section 2.1 and Figure A-1.
6. p.4-7, Section 4.5.2 Parker Flats MRA Phase II, last paragraph. This section describes that the surface sweep will involve investigation of shallow anomalies within 3 inches. Please describe if deeper anomalies that are not completely investigated will be documented. Same comment applies to Volume 2, p.2-2, Section 2.2.1.
7. p.4-11, Section 4.10 Community Relations. First paragraph. The Community Involvement and Outreach Program (CIOP) Plan does not amend the Fort Ord Community Relations Plan; however, it is an enhancement to this existing plan. Please revise the sentence as follows: “The CIOP Plan is an addendum to the Army’s former Fort Ord Community Relations Plan.” Please also see the Army’s comments to similar text that appeared in Draft CIOP Plan.
8. p.4-12, Section 4.10.3.

- a. Bullet 1. It is indicated "all CSUMB faculty, staff, and students residing in campus housing will receive a copy of the newsletter while school is in session." should be re-evaluated. Suggestion to instead describe the actions that FORA and/or the ESCA RP Team will take to reach out to the CSUMB.
 - b. Bullet 1. It is indicated that the FORA newsletters will be posted on the Army's Fort Ord cleanup website. It would be more accurate to state that FORA newsletters that are posted on FORA's website are available by hyperlink to FORA's website from www.fortordcleanup.com/community/factsheets.asp.
 - c. Bullet 5. It is indicated that FORA factsheets will be included into the Information Repositories. Information Repositories are maintained by the Army and typically does not include factsheets. Please revise the text to the effect.
 - d. Bullet 8. The text as written can be mis-interpreted as suggesting that FORA and/or the ESCA RP Team is maintaining the Fort Ord Administrative Record and the Information Repositories. Please revise the text to the effect that FORA and/or the ESCA RP Team will submit RI-related documents to the Army for inclusion in the Administrative Record.
9. p.5-1, Section 5.2 Task 2 Community Relations. The last two sentences indicate that the Army's previous versions of Community Relations Plans (CRPs) have been superseded by the current CIOP Plan and the CRP Update Number 3. To clarify, please revise the text to read "The MEC-related community relations programs implemented at the former Fort Ord have been described in the CRP (Army 1998), the CRP Update Number 1 (Army 2000), the CRP Update Number 2 (Army 2001) and the CRP Update Number 3 (Army, 2006). The CIOP Plan is an addendum to the Army's former Fort Ord CRP."
 10. p.5-2, Section 5.5 Task 5 Data Evaluation. This section indicates that the results of this task will be presented to stakeholders prior to proceeding to the risk assessment. Please describe how this coordination will be accomplished.
 11. p.5-2, Section 5.6 Task 6 Risk Assessment. This section indicates that the results of this task will be presented to stakeholders prior to proceeding to the development of alternatives. Please describe how this coordination will be accomplished.
 12. Table 1 Potential Applicable or Relevant and Appropriate Requirements (ARARs). Please review the "remarks" column so that they address the planned/anticipated CERCLA actions for the Group 1 MRAs.
 13. Please include an acknowledgement of sponsorship pursuant to ESCA Section D.11.
 14. Please coordinate any outreach activities targeting the Department of Defense (DoD) communities that may be affected by the planned field investigation (Fitch and Marshall housing areas, DoD Center) and associated possible road closures with the BRAC Fort Ord Field Office. Our Point of Contact for this matter is Melissa Broadston at 831-393-1284.

Detail/minor comments:

15. p.1-1, Section 1.0. First paragraph. Please replace the phrase "ordnance and explosives" with the more recent term "military munitions."
16. p.1-2, Section 1.3.1. Please see the Army's comments to similar text that appeared in Draft Summary of Existing Data Report (SEDR), Section 2.2.

DRAFT Group 1 Remedial Investigation/Feasibility Study (RI/FS) Work Plan, Seaside Munitions Response Area (MRA) and Parker Flats MRA Phase II, Volume 2

Army Comments:

17. p.2-2, Section 2.2.1 Parker Flats MRA Phase II Remedial Investigation. This section discusses that the investigation of residential and non-residential development areas will entail 100% digital geophysical investigation to the depth of detection. While the plan for structure removal was clarified in Appendix C: Building Demolition and Removal Plan, it is not clear how paved areas such as roads will be handled during the investigation. Please provide additional text to clarify.
18. p.2-8, Section 2.3.5.1 Excavation of Digitally Reacquired Anomalies. Fourth paragraph discusses inspecting discovered MEC items to confirm that it is MEC, MD or other scrap, and that MD and scrap will be transported offsite for disposal or recycling. Please also discuss whether MD will be inspected and certified free of explosives hazard before it is shipped offsite.
19. p.5-21, Section 5.25 Geophysical QC Surveys, QC-2 Geophysical Resurveying. The second paragraph discusses failure criteria of a discovery of an MEC or MEC-like item, or five reacquirable anomalies. Please clarify whether this QC criteria is applied to each 100' x 100' grid, or to the entire footprint of geophysical investigation.
20. Section 7.0 Location Surveys and Mapping Plan. It is our understanding that the ESCA RP Team is in the process of developing a procedure for migrating the munitions response data into the Army's MMRP database, and that you have been coordinating this effort with our MMRP database manager. Please include this procedure into the final version of the Group 1 RI/FS Work Plan to ensure that necessary data is collected throughout the project and available for submission at the end of the project.
21. Please include a procedure for handling a situation in which possible Army obligations, as defined in the ESCA, are discovered during the remedial investigation.
22. p.12-5, Section 12.3.2.3.
 - a. Paragraph #2. The statement that excavated areas will be allowed to revegetate naturally applies to typical mag and dig operations. However, if excavations are larger and disturb more than approximately 200 square feet, then passive or active restoration with follow-up monitoring may be necessary. This will be evaluated on a case-by-case basis.
 - b. Last paragraph. The paragraph states that restoration monitoring will occur in accordance with Chapter 4 of the HMP. However, the requirement to monitor vegetation in Habitat Reserve areas is described in Chapter 3 of the HMP.
23. Appendix D: Standard Operating Procedures. Standard Operating Procedure for MEC with Unknown Filler. Section 5.1 General. Bullet 7 indicates that the standard reporting procedure is for FORA to contact the Presidio of Monterey Police Department (POMPD) who will notify the Technical Escort Unit (TEU). After the property is transferred to FORA, the standard procedure for such notification should be from FORA to local law enforcement agency to the EOD unit assigned to the region. If the EOD unit determines that a response by TEU is needed, it would complete such notification. In addition, FORA should notify the POMPD and the BRAC Fort Ord Field Office when it notifies the local law enforcement agency.

24. Appendix F: Residential Quality Assurance Pilot Study Work Plan. Section F-2.1 RQA Pilot Study Test Areas. It is our understanding that the test area RQA-2 contains a portion that may not be developed for residential use (a portion of Parcel E18.1.1, a part of the veterans cemetery project). Please re-assess the suitability of this site for RQA pilot study implementation given the uncertainty in the future use.
25. Appendix F: Residential Quality Assurance Pilot Study Work Plan. The Army will provide additional review comments on the Residential Quality Assurance Pilot Study Work Plan after regulatory agencies provide their inputs.

Detail/minor comments:

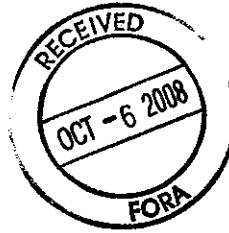
26. Table 5-1, Recovery and Penetration Depths of MEC Previously Encountered in Parker Flats MRA Phase II. One of the footnotes describes MRA as "Munitions Response Site." Please correct this to "Munitions Response Area."
27. Appendix B: MEC Data. The Hazard Classification table describes hazard classification 0 as "Inert MEC that will cause no injury." By definition MEC is explosive in nature, therefore category 0 or "inert" classification is not possible for a MEC item. Classification 0 should be described as "inert munitions item that will cause no injury" instead.
28. Appendix F: Residential Quality Assurance Pilot Study Work Plan. Figure F-2. The legend describes hazard classification 0 as "Inert MEC that will cause no injury." By definition MEC is explosive in nature, therefore "inert" classification is not possible for a MEC item. Classification 0 should be described as "inert munitions item that will cause no injury" instead.
29. Appendix I: Explosives Siting Plan. Section 1.6.1 Detonation Site Blow-In Place. The second to the last bullet discusses that after property transfer, fire risk assessment for planned detonations will be conducted by the City of Seaside Fire Department. Please verify if this is the case since the majority of the investigation area is within the jurisdiction of the Monterey County.
30. Appendix J: Site Safety and Health Plan. Section J-12.4 Offsite Emergency Response Services. Table J-6 Emergency Contacts lists City of Seaside police and fire agencies. Please verify whether Monterey County law enforcement and fire agencies need to be identified, since the majority of the investigation area is within the jurisdiction of the Monterey County.

SC
LB

Marina Equestrian Association
P.O. Box 1320
Marina CA 93933

24 September 2008

FORA
Attn: Mr. Stan Cook
100 12th Street
Building 2880
Marina, CA 93933



**Marina
Equestrian
Association**

Ref: Requests relating to Remediation Program for Parker Flats MRA (Group 1)

Dear Mr. Cook

The Marina Equestrian Association (MEA), which operates the Marina Equestrian Center (MEC), would like to address aspects of the FORA / ESCA Remediation Program contained in the Draft of "Group 1, Remedial Investigation / Feasibility Study Work Plan" relating to The Parker Flats Munitions Response Area. Certain aspects of this plan impact the operation of our organization, the facility we run and visitor-users of our site.

We fully support remediation of these areas. However, as a public access equestrian facility, the MEC needs to be supported in having safe access to the BLM during this time of fieldwork and in gaining access to the Parker Flats area as soon as possible to continue our recreational and public access use of those areas.

Our specific comments for FORA's consideration are:

- a. We ask that FORA consider opening the Parker Flats MRA as soon as field work is completed and dangers have been removed. Opening the site while paperwork is completed would reduce the time and burden of lost access and continue our present public uses more quickly.
- b. Equestrian use should be added to paragraph 2.3.1 as a daily recreational user.
- c. Equestrian use should be included, in paragraphs 2.3.1 and 2.3.2. for past, current and future land use
- d. We wish to provide testimony that current recreational uses of the Parker Flats MRA are not conflicting and all should be accommodated after remediation. These daily recreational users are hikers, joggers, bikers, dog walkers and horse riders.
- e. We ask to have the Marina Equestrian Center acknowledged, where appropriate, as an historic and future source of users to this area due to its close proximity to Parker Flats and its unique connection to the National Park Service.

Background and the specific impact of this closure on our operations are detailed in the following pages. Our suggestions are also detailed there. Lynne Gose, at 831-883-8644 or jrgose@comcast.net, is our point of contact on this issue.

We appreciate the care with which the public is kept informed of FORA and ESCA activities in the former Fort Ord lands and the opportunity to provide input in these important processes.

Sincerely,

The 2008 MEA Board of Directors

1. Introduction

The Marina Equestrian Association (MEA) would like to address aspects of the FORA ESCA Remediation Program contained in the Draft of "Group 1, Remedial Investigation / Feasibility Study Work Plan" relating to Parker Flats Munitions Response Area. Certain aspects of this plan impact the operation of our organization, the facility we run and visitor/users of our facility.

2. Background and History

The Marina Equestrian Association operates the 15 acre Marina Equestrian Center (MEC) at the corner of 5th Street and 9th Avenue in Marina. Equestrian activities have operated in this portion of Fort Ord since about 1905 when the first US Army cavalry units occupied this site and used what is now FORA and BLM land for maneuvers. The renowned 11th Cavalry "Blackhorse" unit was the last military unit to occupy the site before the cavalry was disbanded in 1965. Many of the trails we ride today are those created and traveled by cavalry troupers throughout the last century.

In 1965 the military stables was given a recreational use. Military and civil service employees assigned to Military stations on the Monterey Peninsula created a cooperative organization to run the site as a riding club for military family recreation. Trail use continued with this organization. With the closure of Fort Ord in the 1990s, the survival of the facility was in doubt.

Faced with the loss of their Army sponsor for the land, and the potential loss of the facility for use by military families assigned to the Monterey peninsula, the Marina Equestrian Association (MEA) was founded as a non profit organization to explore the possibility of preserving the facility for public use. MEA approached the City of Marina in April of 1994 to sponsor their application to continue the equestrian activity on the (then) 34 acre property.

At the urging of citizens of the community, The City of Marina requested, under the Federal Lands to Parks Program and FORA, to keep the stables open to provide public recreation and take advantage of the extensive trail systems. The land was transferred to The City of Marina as an Equestrian Center with oversight by the National Parks Service. MEA operated the facility and provided boarding of horses and other programs to citizens of Marina and the Monterey Peninsula.

MEA has operated a successful stable for horse-owning members of the community willing to provide their own labor and skills to offset the normal payroll and commercial costs of operating a stable. This creates a unique recreational opportunity for working-class families to experience horse ownership and make use of easy access to the extensive Fort Ord and BLM Trails.

Over time, MEA provided a variety of public access programs in the community. Most recently, MEA has offered riding lessons, quarterly Kids Days, a community open house, BLM orientation rides for area trailriders, the Marina School Break Riding Camp Programs. Always, the center is available for visits, as a picnic site, for arena rental, for travelers visiting the area with horses (a hotel for horses), riding lessons, or for safe access to BLM trails for area horse owners. CSUMB students also volunteer for public service, ride, or board horses at the MEC.

The Center is active as an emergency evacuation site for livestock and members are registered with local rescue missions to assist with transportation of horses from endangered locations during fire season or other disasters. During the 2008 fire season, the Center hosted eight horses evacuated from Big Sur fire, at no cost to their owners. Members also participate in the Monterey Bay Bicycle and Equestrian Assistance Team (BETA) to provide visitor assistance, emergency response and patrol on the trails of the BLM and MEA participates monthly in the FORA User's Working Group. Other MEC riders provide a service to the governing jurisdictions of FORA and BLM public lands by reporting dangers, illegal use and trail assistance while riding these areas.

3. Location of the Equestrian Center

The center is located less than one mile from the Northwest corner of the CSUMB Off-Campus and County North areas (see map at Figure 1). By our system of trails we are about 3 miles from the access point to the BLM, where it is bordered by Watkins Gate Road or 2 miles from the Gigling Road access at 8th Street and Gigling Road. Our members, visitors and users, if not riding through the CSUMB Off-Campus area, often park at the 8th and Gigling Road parking area access the Parker Flats area.

4. Land Use by MEA (ref paras 2.3.1 and 2.3.2)

Our organization and its membership is the latest in a long line of equestrian, hiker and dog-walking users of the Parker Flats MRA. Before our current day, users were the many military families and the cavalry troupers who used this extensive network of trails. Although members occasionally hike, bike and dog-walk the area, our primary concern for this request is the use of these trails by horseback. These undeveloped areas have soft footing and perfect trails for horses and their use has been passed down among riders for decades. Our members and guests use these areas DAILY for equestrian recreation and to gain access to the adjacent and more extensive BLM lands.

MEA provides public access and a safe trailhead for equestrian users of the Western portion of the Fort Ord BLM. Over the decades, area and regional riders brought their horses to our facility which provided a safe and secure environment to unload horses and a location which could provide restroom facilities and running water for watering and bathing horses after a long ride. Most riders explore the BLM, CSUMB Off-Campus and North County, and Parker Flats trail areas with rides of 2-6 hour durations.

5. General Comments

In MEA's experience, all current users (bike riders, dog walkers, hikers and equestrians) get along well, are courteous and safety minded when on the trail. In our view, these are all compatible activities. All groups are mutually supportive of use of trails by other user groups and support sharing this recreational resource.

MEA fully supports munitions cleanup and has worked to educate our membership and visiting riders of the importance of this remediation. We have worked diligently with the FORA user's Group to stay abreast of the remediation plans and requirements and to educate other users with whom we have contact. This summer we hosted two equestrian trailride events informing area riders of the impending CSUMB Off-Campus, North County and Parker Flats trail closures, and oriented them with the authorized access corridors to the BLM. We also provide modified maps to the trail riding public showing the new access corridors and optional parking areas.

However, as a public access facility, the MEC needs to be supported in having SAFE access to the BLM during this time of fieldwork and in gaining access to the Parker Flats area as soon as possible to continue our recreational and public access use of those areas.

6. Impact of closures on MEC's public access use and outreach

Closure for longer than absolutely necessary to make the area safe severely limits our ability to perform our BLM access and public equestrian recreation missions. For the past year, MEA has been negotiating with a concessionaire to provide trail rides onto public lands to members of the public who do not own their own horses. This was a use of our facility and equestrian trails were envisioned and mapped out in early FORA planning. Delays of longer than absolutely necessary after fieldwork and remediation are complete will significantly impact the economics of public trail rides and the viability of this and other public access programs.

Closure to public use of this highly desirable Parker Flats area is a frustration to regular users and severely undercuts the access to public recreation our organization provides. Delays not required by safety could even threaten the very existence of the Marina Equestrian Center if public use declines while trails are closed or as equestrian access route become viewed as abandoned. In these times when land has become so valuable, there is enormous pressure on the MEC continue public access activities or face the possibility the City of Marina can justify other uses for the equestrian site.

7. Suggested alternatives to elevate this public access problem

For these reasons we ask that the Parker Flats MRA be opened as soon as field work has been completed and the dangers have been removed. Delays to process paperwork could threaten critical public access programs and thereby the very existence of the Equestrian Center. We have been told that paperwork for site closure can take one-and-a-half to two years to complete once field work has been completed. These extra years with no access are an unnecessary burden in the users of these areas, particularly when there has been a long history of uneventful use. It would be a particularly galling burden to be excluded from using these areas while paperwork is processed after they have been made safe.

By opening the Parker Flats area following field work and munitions removal, there will be an area for public trailriding convenient to the Gigling Road parking lot available while the CSUMB Off-Campus and North County areas are still undergoing field work. Accessing the BLM in a safer and

more aesthetically pleasing way for those using Gigling Road trailer parking access would be available months or years earlier. Riding through the Parker Flats area to reach the BLM would avoid a long walk on Gigling Road pavement to reach the BLM entrance. Equestrian users of the MEC and public trail riders will also be able to enjoy closer and more varied recreational alternatives much sooner.

8. In summary, our specific comments for FORA's consideration are:

- a. We ask that FORA consider opening the Parker Flats MRA as soon as field work is completed and dangers have been removed. Opening the site while paperwork is completed would reduce the time and burden of lost access and continue our present public access and equestrian recreation missions more quickly. It would benefit other users as well.
- b. Equestrian use should be added to paragraph 2.3.1 as a daily recreational user.
- c. Equestrian use should be included, in paragraphs 2.3.1 and 2.3.2. for past, current and future land use
- d. We wish to provide testimony that current recreational uses of the Parker Flats MRA are not conflicting and all should be accommodated after remediation. These daily recreational users are hikers, joggers, bikers, dog walkers and horse riders.
- e. We ask to have the Marina Equestrian Center be acknowledged, where appropriate, as an historic and future source of users to this area due to its close proximity to Parker Flats and its unique connection to the National Park Service.

