

Army Response to Comments from the California Department of Toxic Substances Control on the Draft Final Fort Ord Community Relations Plan Update Number 3, Fort Ord California

General Comments

Comment 1

Translation/Demographics: More outreach may be needed in Spanish, especially information about prescribed burns. The community surveys were all in English, yet 4.5% of the respondents suggested providing information in Spanish. The United States Census Bureau 2000 data indicates that 47.3% of the Monterey County residents speak a language other than English. It may be necessary to provide Spanish translations and place public notices for prescribed-burn related information such as burn notifications in a Spanish language newspaper. The Language Line and the Spanish phrase on printed material both rely on the individual to seek out information. Public (and small group) meetings and documents related to prescribed burns need to include Spanish translations. The upcoming Munitions Response Site 16 (MRS-16) prescribed burn notification program needs to be conducted in English and Spanish. A Spanish language television/radio reporter attended a 2004 Community Advisory Group meeting and the March 2006 Fort Ord Environmental Justice Network Town Hall meetings asking questions about burning. At both meetings, she indicated that her Spanish speaking viewers/listeners were very interested in issues related to prescribed burns and smoke impacts.

Response 1

The outreach activities related to the prescribed burn at Munitions Site 16 are rather detailed and are being addressed in a notification / outreach plan that is site specific and includes provisions for contacting and communicating with non-English speakers. The Community Relations Plan provides an overview of outreach related to prescribed burns. Please note that the local Spanish language television station (Univision, KSMS) and local Spanish Language newspaper (El Sol) provide translation for information provided in English.

Comment 2

The Community Relations Plan needs more detail on how to reach out to new students at the California State University Monterey Bay campus each semester. Many of these students also live on the former Fort Ord, some near the landfill. New students arrive at the beginning of both the fall and spring semesters, and most are learning the information for the first time. The Army did respond to comments and concerns raised by students at the October 12, 2005 Community Involvement Workshop and on e-mailed surveys from a CSUMB location. The Army's response included a February 22, 2006 informational meeting at the CSUMB campus, informational booths at campus events, and providing printed and internet information. The Community Relations Plan needs to also describe how the new students will receive basic information on the Fort Ord cleanup. During the

February 22, 2006 meeting, a student who frequently attends Fort Ord Cleanup public meetings expressed a concern that only two out of the four Community Involvement Workshops are held while school is in session. Consider scheduling one more of the Community Involvement Workshops during the time school is in session.

Response 2

The Community Relations Plan provides a review of outreach specific to California State University Monterey Bay. As noted in the Community Relations Plan, the Army will continue to provide cleanup information to California State University Monterey Bay administrative officials for their use and distribution. An important part of this outreach is a strong relationship between the University's Public Information Officer and the Army's environmental staff. Due to privacy issues, the names and status of California State University Monterey Bay students, including new students, are not available to the Army. As such, it is important that the Army provide information to officials at California State University Monterey Bay so that they may make a University-wide distribution using their internal information systems. The key university contacts are: Ms. Joan Weiner, the News and Information Affairs Officer for the University and Ms. Diane Ehlers, the Environment, Health and Safety contact for the University. Contact information has been included in Appendix B.

Regarding the student request to reschedule more Community Involvement Workshops during the school session, please note that outreach is not limited to Community Involvement Workshops. These are just one of several types of outreach events that are conducted. We are available for tours, presentations, information booths, and town halls as requested by student organizations, faculty and staff. As noted, there are two Community Involvement Workshops and an open house/bus tour scheduled during the school session. Another bus tour/open house and Community Involvement Workshop take place during CSUMB's summer session. Based on the variety of available outreach activities, as well as the availability of small community groups meetings upon request, the quarterly schedule of Community Involvement Workshops will remain the same.

During the 2005-2006 CSUMB School year there were several CSUMB specific outreach events in addition to the community-wide Community Involvement Workshops. These events, listed in Appendix J included: (1) a campus-wide delivery of the Fort Ord Annual Report, Military Munitions Proposed Plan for Site 16, and the Fort Ord Newsletter; (2) Army participation in an environmental cleanup town hall at CSUMB; (3) a cleanup information booth at the on-campus Earth Day fair; (4) Army participation in a Fort Ord Community Advisory Group meeting held on campus for CSUMB students; (5) a cleanup information booth during Fall Student Orientation; (6) three door-to-door fact sheet distributions for residents of CSUMB's Frederick Park. In addition, Ms. Weiner also posted several "Open Form" regarding the Fort Ord cleanup. Based on the variety and number of outreach activities related to CSUMB, we will maintain the existing schedule for Community Involvement Workshops.

Specific Comment 1 Acronyms and Glossary

Page viii: The glossary of terms needs to indicate that CERCLA (Comprehensive Environmental Response, Compensation and Liability Act) is "commonly known as

Superfund” to make its significance relevant to the laypeople. Avoid defining other acronyms and terms with other non-lay terms (specifically “CERCLA”). Revise the definition of hydrogeology to change “geology of groundwater” to “groundwater science.”

Response to Specific Comment 1 Acronyms and Glossary

The acronyms and glossary section has been revised as requested.

Specific Comments

Comment Section 1. Overview of the Community Relations Plan:

Comment 1 1.5 – Points of Contact

Include a referral to the DTSC Public Participation Specialist, Kris Escarda, 8800 Cal Center Drive, Sacramento, CA 95826, phone (916) 255-6683, fax (916) 255-3654, kescarda@dtsc.ca.gov. This can be simply a referral to another section, such as Appendix G, page 3. The reference to the regulatory agency contacts at the end of this section needs to be in bold or capitalized. The full Web address for the regulatory/important contacts needs to be provided, not just www.fortordcleanup.com

Response 1.5 – Points of Contact

Section 1.5 has been revised as requested.

Comment 2 1.9 – Guidance

The Community Relations Plan references the United States Environmental Protection Agency (USEPA) *Community Relations in Superfund, A Handbook* published in July of 1992. Another US EPA document is also from 1992. US EPA has more recent guidance available, including *Superfund Community Involvement Toolkit*, April 2003. The documents are available at the following Web address:

<http://www.epa.gov/superfund/action/community/involvement.htm>. The Community Relations Plan could reference these more recent resources if either is used to evaluate the final Community Relations Plan before final publication.

Response 1.9 – Guidance

Section 1.9 has been revised as requested.

Comment 3 1.13 – Role of the Regulatory Agencies

Mention names of key non-BRAC Cleanup Team (BCT) regulatory agencies that review investigation and cleanup proposals (such as Monterey Bay Unified Air Pollution Control District, California Department of Fish and Game, California State Parks, United States Fish & Wildlife Service, and Bureau of Land Management) and refer the reader to Appendix G. “CalEPA” SHOULD BE “Cal/EPA.”

Response 3 1.13 – Role of the Regulatory Agencies

Section 1.13 has been revised as requested.

Comment 4 1.14 – Role of the Fort Ord Reuse Authority

The document refers the reader to a website and phone number to obtain contact information for current public officials. Also refer the reader to this information in Appendix G.

Response 4 1.14 – Role of the Fort Ord Reuse Authority

Section 1.14 has been revised as requested.

Comment 5 5.0 – Soil and Groundwater Contamination, Page 21

Italicize “*Basewide*” before “*Remedial Investigation/Feasibility Study*” as part of the title of the document.

Response 5 5.0 – Soil and Groundwater Contamination

Section 5.0 has been revised as requested.

Comment 6 5.3 – Overview of the Soil and Groundwater Cleanup Processes

Insert “(groundwater science)” after “Hydrogeologic” for readers unfamiliar with this term. Enlarge the “Community Involvement Activities at NPL Sites” diagram on page 25. This graphic contains useful information, but the text is too small to read. Consider enlarging to a full page, and rotating 90 degrees to fit. Insert a lay definition such as the following at the top of page 26: “Bioremediation is the use of living organisms to clean up certain types of pollutants from soil and water.”

Response 6 5.3 – Overview of the Soil and Groundwater Cleanup Processes

Section 5.3 has been revised as requested.

Comment 7 7.1.1 – On-base and Nearby Residents

Organizations listed in this section include Shelter Plus, Goodwill Industries, Children’s Services International, American Youth Hostel, Veterans Transition Center, Mid-Peninsula Housing, Interim Inc. These organizations and agencies all need to be added to the list of “Community Organizations and Citizen’s Groups” list in Appendix G. Ensure contact information for all schools, colleges, and organizations listed on pages 33-34 are included in Appendix G. A development for the East Garrison area is also planned and needs to be included in the description for this section.

Response 7 7.1.1 – On-base and Nearby Residents

Appendix G and Section 7.1.1 have been revised as requested.

Comment 8 7.1.5 – Minority and Low Income Populations

Provide percentages of minority populations in this section or section 7.1.1. The reader should not need to refer to the Appendix for a few key statistics, for example: “African-American (3.7%), Hispanic (46.8%), and Asian/Pacific Islander (6.4%).” While the median household income is above the U.S. Department of Health and Human Services guidelines, the percentages of both individuals (13.5%) and families (9.7%) living below the poverty level is slightly higher than the U.S. averages (12.4% and 9.2% respectively, which corresponds to 9.2% and 9.5% higher levels of people below the poverty line). Name some of the organizations and groups that represent these populations.

Response 8 7.1.5 – Minority and Low Income Populations

Section 7.1.5 has been revised as requested.

Comment 9 7.3 – Key Local Issues and Interests

In the second paragraph, and in other sections, include percentages “22% of participating community members (44 of 200)” similar to the first sentence, instead of simply numbers “(37 of 200).” This will make it easy for the reader to interpret the data, especially where the number of surveys is not indicated, and compare results with past and future surveys.

Response 9 7.3 – Key Local Issues and Interests

Section 7.3 has been revised as requested.

Comment 10 7.4.4 – Vegetation Burning/Air Quality

This section could use more elaboration. The text should specify the percentage “(42.5%)” of survey respondents who expressed interest in vegetation burning information in the multiple choice/check all that apply question number 4. Prescribed burns and smoke impacts are the top concern mentioned to the DTSC Public Participation unit over the past three years. Community members frequently mention concerns about prescribed burns and smoke impacts at Community Involvement Workshops and other public meetings. Recommended upgrades to this section include providing the approximate number of individuals who attended special meetings and participated in relocation related to the 2003 prescribed burn, outreach planned for the 2006 burn, and the 1-800-number. Consider providing prescribed burn related community bulletins in Spanish and having translators available for meetings related to prescribed burns. Spell out MR RI/FS for readability.

Response 10 7.4.4 – Vegetation Burning/Air Quality

Section 7.4.4 has been revised to specify the percentage of survey respondents who expressed interest in vegetation burning information as noted. MR RI/FS has also been revised as recommended. As noted earlier, outreach details for the next prescribed burn event are included in the site-specific notification / relocation plan. The list of events and attendance record for the 2003 prescribed burn outreach events is included in Appendix J the Community Involvement Record.

Comment 11 7.4.5 – Groundwater and Soil Contamination

Change “some” to “significant” in the first sentence; 116 responses out of 200 is significant. The document discusses door-to-door visits concerning the results of an investigation of the carbon tetrachloride contamination. The Community Relations Plan should include more information about the 2003 and 2004 community notice campaign, such as the purpose of the door-to-door contacts, how many people were contacted, and questions/comments/concerns mentioned by the individuals. The document should also provide more details about future door-to-door visits.

Response 11 7.4.5 – Groundwater and Soil Contamination

Section 7.4.5 has been revised to change “some” to “significant.” The following references have also been included in this section. “Details on door-to-door visits are included in Section 8.2.10. Specific information about door-to-door events, including number of participants, is included in Appendix J – the Fort Ord Community Involvement Record.”

Comment 12 7.4.8 – Community Relations Activities

More detail on concerns and recommendations would be helpful in this section. In addition to information from interviewees, the responses from the surveys should be described. Concerns and recommendations expressed at other community involvement venues (for example, notes from Community Involvement Workshops) should be included in this section.

This section includes the following sentence: “Each elected official interviewed recommended that Environmental Services Cooperative Agreement be finalized.” This section should remind the reader about the significance of an Early Transfer/Environmental Services Cooperative Agreement by including words “Early Transfer” and describing why the elected officials are recommending such an agreement.”

The specific “additional presentations” should be listed.

Response 12 7.4.8 – Community Relations Activities

Concerns and recommendation have been addressed in section 7.4 which also includes informal comments and concerns made during Community Involvement Workshops and other outreach events. The phase “Early Transfer” has been added to this section. The rationale for the elected officials’ recommendation for the Early Transfer/Environmental Services Cooperative Agreement was not discussed during the interviews. Additional information regarding this process is available through the Fort Ord Reuse Authority. A Fort Ord Reuse Authority reference has been added to this section. The specific organizations that the interviewees suggested for future presentation offers have been added to section 7.4.8 as requested.

Comment 13 7.4.9 – Other Community Comments

Spell out BCT as BRAC Cleanup Team. The last paragraph states that “The Army and appropriate agencies address these concerns through public forums, fact sheets...” It would be helpful to include one or more examples of how the Army addressed some of the concerns, and attach a copy of the fact sheet, newsletter, or website material. Stating that the Army addressed the concerns isn’t sufficient; one or more examples are needed here.

Response 13 7.4.9 – Other Community Comments

This section has been revised as requested.

Comment 14 7.4.10 – Comments from Outreach to California State University Monterey Bay

This section includes a sentence in the first paragraph that reads, “...meeting development included participation by the Environmental Senator...” The text should describe what an Environmental Senator is and indicate that this is an elected Associated Student position (if this is the case). The text should clearly describe why it was/is important for the student in this position to be included in meeting development and coordinating outreach to students. The specific name of the student currently serving in this capacity needs to be removed.

During the February 22, 2006 meeting, a student expressed concerns that only two out of the four quarterly Community Involvement Workshops are held while school is in session.

This section should describe how new students arriving each semester will be informed

about the Fort Ord cleanup and that they are attending school on (and, for dorm residents, living on) a CERCLA (also know as Superfund) site.

Response 14 7.4.10 – Comments from Outreach to California State University Monterey Bay

Section 7.4.10 has been revised as requested. As noted in Response 2, based on the variety and number of outreach activities related to CSUMB, we will maintain the existing schedule for Community Involvement Workshops. Please see Response 2 for details. As noted in Response 2, due to privacy issues, the names and status of California State University Monterey Bay students, including new students, are not available to the Army. The contact information for the California State University Monterey Bay Environmental Senator has been included in Appendix G. Please see Response 2 for additional details regarding California State University Monterey Bay outreach.

Comment 15 Section 8

When survey totals are referenced, these numbers should also be reported in percentages in order to compare 2005 results with past and future results.

Response 15 Section 8

Previous surveys can not be compared since they were not implemented in the same way as the 2005-2006 survey. No changes have been made to this section.

Comment 16 8.1.1 – Methods of Communication

The *Herald* newspaper's complete title is the *Monterey County Herald*. This should be identified as such.

Response 16 8.1.1 – Methods of Communication

This section has been revised as requested.

Comment 17 8.1.2 – Community Preferences for Receiving Information

The third paragraph states that fact sheets are used to describe, among other things, proposed cleanup plans. In the past two years, Proposed Plans have not typically included a fact sheet version. Unless fact sheets are planned for the upcoming Carbon Tetrachloride and Track 2 Proposed Plans, this wording should be revised.

Response 17 8.1.2 – Community Preferences for Receiving Information

This section has been revised to distinguish between a fact sheet and a proposed plan.

Comment 18 8.1.4 – Information Repositories

This section needs to include the hours of operation for the Information Repositories. The last two paragraphs describe cleanup web site visits and document searches. While the web site is an excellent resource frequently accessed by community members, the text needs to mention that some of the site visits and document searches are conducted by government agency staff and government contractors in their normal course of business. Mention that the Administrative Record and the California State University Monterey Bay Library are the only complete Information Repositories.

Response 18 8.1.4 – Information Repositories

This section has been revised as requested.

Comment 19 8.1.6 – Translations (See General Comment number 2) Consider translating more fact sheets into Spanish.

Response 19 8.1.6 – Translations (See General Comment number 2)

As noted in Section 8.1.6, the phrase “Para obtener una copia en Espanol contacte 831-393-1284” will be added to all future Fact Sheets. We will consider translating more fact sheets into Spanish based on the number of requests.

Comment 20 8.2.12 – Community Involvement Workshops

Add “and recipient (Fort Ord Environmental Justice Network)” after or before “EPA Technical Assistance Grant consultant.”

Response 20 8.2.12 – Community Involvement Workshops

Section 8.2.12 has been revised as requested.

Comment 21 Appendix B

The Fort Ord Reuse Map is difficult to read and interpret. Consider using a larger pull-out version or multiple pages to allow the reader to see the detail and read the legend. The size of the maps in Appendices A and C work well.

Response 21 Appendix B

A larger sized map has been included in the Final Community Relations Plan as requested.

Comment 22 Appendix C

The “Soil and Groundwater Cleanup Sites” map would benefit from outlines of groundwater plumes. The acronyms “GW,” “OU,” “IRP,” “CSUMB,” and “FAAF” need to be spelled out. “Airfield” can be substituted for “FAAF.”

Comment 22 Appendix C

The “Soil and Groundwater Cleanup Sites” map has been revised as requested.

Comment 23 Appendix C

The Site Summary list needs to spell out some acronyms, including MEC, MC, FFE, DEH, DOL, DRMO, RES, FAAF, and AAFES. Site name/number changes need to be referenced. For example, site 3 is also referred to as OE 22, and MEC 22 in other documents.

Response 23 Appendix C

The Site Summary list has been revised as requested; however, please note that Site 3 is the designated title for the area with regards to lead-contaminated soil and MRS 22 is the designated title for the area with regards to potential munitions and explosives of concern site.

Comment 24 Appendix C

Major streets need to be labeled.

Comment 24 Appendix C

The map has been revised as requested.

Comment 25 Appendix D

“FAAF” and “CSUMB” need to be spelled out on the “Munitions Response Site Map.” If possible, insert “(MRS)” after “Munitions Response Sites” in the legend.

Comment 25 Appendix D

The title of the Munitions Response Site Map has been revised as requested. The legend has not been changed.

Comment 26

The United States Census Bureau data is county wide, not the area around Fort Ord. The data indicates that 47.3% of the Monterey County residents speak a language other than English. We recommend isolating demographic data to those communities more immediately affected by the Former Fort Ord and looking into which languages are spoken. It may be necessary to provide Spanish Translation and place public notices in a Spanish language newsletter.

Response 26

Demographic data for adjacent/immediately affected communities has been added as requested. As noted in Section 8.2.15, El Sol is the local Spanish language newspaper that is used when Spanish language notices are necessary. El Sol provides translation for paid advertising.

Comment 27 Appendix E

Check the phone number for the Presidio of Monterey on the sample Safety Alert.

Response 27 Appendix E

All three phone numbers on the Safety alert are active and can be used to report Ordnance and Explosives.

Comment 28 Appendix G

Organize the Federal and State/Local listings by Agency name, rather than alphabetically by individual staff names. It also seems like there should be at least one more Hispanic-American organization (with a phone number and e-mail) and possibly one that provides services to immigrants.

Add DTSC Project Manager Sue Goss to the State and Local Agency list (her contact information is correctly listed in Section 1.11).

In the Community Organizations and Citizen’s Groups, add the following American Red Cross, Arc Ecology.

Response 28 Appendix G

Appendix G has been revised as requested.

Comment 29 Appendix O

Include addresses for the Oldemeyer and Casanova-Oak Knoll Centers.

Response 29 Appendix O

Appendix O has been revised as requested.

Comment 30 Appendix P Response to Fort Ord Environmental Justice Network comments prepared by Environmental Stewardship Concepts, their technical advisor

- a. Response 1: This response does not fully answer the concern about the current community involvement workshops not being designed to provide a means for community members to influence policy.
- b. Response 1: Community Involvement Workshops take place quarterly, not monthly. Other community relations venues are provided on some of the months. The third sentence from the end needs to be reworded.
- c. Response 1: Remove “and Present” after “past” and before “members;” there are no present members.
- d. Response 5: The response does not address outreach to Spanish speaking residents.
- e. Response does not address outreach to Spanish speaking residents.

Response 30 Appendix P Response to Fort Ord Environmental Justice Network comments prepared by Environmental Stewardship Concepts, their technical advisor

- a. Citizens influence policies through their elected officials. The list of elected officials is included as Appendix G.
- b. A correction has been included at the end of this Appendix.
- c. A correction has been included at the end of this Appendix
- d. A correction has been included at the end of this Appendix.
- e. A clarification has been included in Appendix P.

Comment 31

The Community Involvement Workshop sample agenda and Post-Workshop Summary Notes in the Draft Community Relations Plan were missing from the Draft Final document. The Post-Workshop Summary should be immediately after Community Involvement Workshop and should be for the same workshop – for example, April 2006 CIW and April 2006 Post-Workshop Summary notes.

Response 31

These items, as well as all text references, were removed from the Draft Final version as suggested by the U.S. Environmental Protection Agency in an effort to streamline the Community Relations Plan.

Army Response to Comments from the Fort Ord Environmental Justice Network

Comment 1

The role of the impacted, local residents needs to be described more clearly. The Community Relations Plan should articulate how the impacted community residents are assisted in carrying out their roles, and how they can really impact the processes. Since the Restoration Advisory Board, local residents feel that their voices are not important in the decision making processes. Please see more detailed information in the following pages.

Response 1

Superfund community involvement is the process of getting community members actively involved in planning for, and cleaning up a Superfund site. Superfund community involvement is the process of engaging in dialogue and collaboration with community members. The Fort Ord Community Relations Plan provides a background of the cleanup project as well as describing the variety of ways the community can be involved with the process. The Community Relations Plan provides the framework for many ways to participate; how to participate is the choice of each person.

Comment 2

The role of the regulators seems to be general in nature and does not reflect protecting our communities concerning health affects. FOEJN feels that the role of the regulators should not be that of simply getting residents to attend the clean-up meetings, especially since there is no indication that there is meaning to the process.

Response 2

The role of the BRAC Cleanup Team is included in Section 1.11. The priority for cleanup at Fort Ord, as for any Superfund site, is to protect human health and the environment.

Comment 3

Further, FOEJN believes that the role of the regulators should specifically focus on removal of any health threat and treatment for possible toxic health effects to residents, and their families. We believe that the role of the regulators should work directly with local residents, especially when dealing with a military installation the age, history, and size of Fort Ord.

Response 3

As noted in Response 2, the priority for the cleanup at Fort Ord, and Superfund sites in general, is to protect human health and the environment. The Community Relations Plan includes information about accessibility to the BRAC Cleanup team as well as other regulatory agencies, elected officials, and community leaders who are involved with the Fort Ord cleanup project.

Army Response to Comments on “Draft Community Relations Plan, Update Number 3 Fort Ord, California” Prepared By Environmental Stewardships Concepts On Behalf of the Fort Ord Environmental Justice Network May 4, 2006

Comment 1 Recommendations

- The document needs to be fleshed out more and the overall strategy needs to be more clearly articulated.
- The Army should reestablish the RAB at the former Fort Ord.
- Community outreach and notification need to be expanded.
- The Army should not transfer and authority regarding cleanup or community outreach to FORA.
- The text of the plan needs to be reorganized to make it easier to read and follow.
- A section should be added detailing any changes from the previous CRP and the reasoning behind those changes.

Response 1 Recommendations

- As noted in our response to your comments on the draft version, this Community Relations Plan includes a section dedicated to objectives and includes a variety of ways to meet those objectives. Specific recommendations were not provided in comments to either the draft or the final version of the Community Relations Plan.
- As noted in our response to your comments in the Draft version, at the current time, the re-establishment of the Restoration Advisory Board is not under consideration. The summary results of the recent community survey does not indicate interest in a Restoration Advisory Board.
- Community outreach and notification meets or exceeds all Superfund outreach requirements. The Fort Ord cleanup outreach program continues to look for ways to increase accessibility, provide opportunities for the public to learn about the cleanup and provide a variety of ways for the public to participate. Some examples have been included in Section 7.4.9.
- Comment noted. As of June 2006, the early transfer / environmental services cooperative agreement has not been finalized. As such, Section 7.4.8 has been revised to include references to the Fort Ord Reuse Authority as the point of contact for the community to have access and updates to this in-progress action.
- Responding to this is difficult without specific recommendations. As noted earlier, the Community Relations Plan follows the format suggested by the U.S. Environmental Protection Agency.
- As noted in our response to comments on the draft plan, Section 8.2 addresses changes.

Comment 2 Document Summary

The community relations plan (CRP) is designed to outline and explain the methods that the Army communicates with and responds to the public at the former Fort Ord. The Army uses surveys and interviews to assess the effectiveness of current procedures. Currently, a combination of newsletters and paid advertisements in local newspapers are the primary means of communication, and they are supplemented with regular Community Involvement Workshops where community members that attend are informed of the progress on the cleanup of the former Fort Ord. This version of the CRP document includes responses to previous comments made by FOEJN and others.

Response 2 Document Summary

The comment is noted; however 15 other outreach methods are outlined in Section 9.2 in addition to a newsletter, Community Involvement Workshops and advertising.

General Comments

Comment 3

While some important changes have been made, the overall document has not changed significantly from its previous draft. The Army has made important changes, but the vast majority of the comments on the previous version are still relevant. These recommendations included expanding the CRP and including a more detailed strategy for community involvement. The Army should reestablish a Restoration Advisory Board (RAB) that should be a key component of any future community outreach efforts. The Army also should not transfer any of its responsibilities regarding cleanup or community outreach to the Fort Ord Reuse Authority (FORA). Transferring responsibility would only make participation more difficult for community members who are interested in the cleanup process.

Response 3

Section 9.1 has been expanded to include additional details linking the objectives to specific methods. As noted in our response to your comments in the Draft version, at the current time, the re-establishment of the Restoration Advisory Board is not under consideration. The summary results of the recent community survey does not indicate interest in a Restoration Advisory Board. Please note that 22 other outreach methods are outlined in Section 9.2 in addition to newsletters and Community Involvement Workshops. Information regarding transfer of cleanup responsibilities and related community involvement is included in the Section 1.14. We recommend that you discuss your concerns with the Fort Ord Reuse Authority representatives. Contact information for this agency is available in Section 1.14.

Comment 4

The community has been vocal and active in the cleanup process, asserting their desire for a cleanup that protects human health and takes steps to restore their community. Citizens have also expressed their concerns that the cleanup process needs to address the community economic issues related to the cleanup. Some of these issues are listed in brief form on page 6, in section 1.7. This section should be expanded and the issues clearly explained.

Response 4

Section 7.4 includes details of community concerns. A reference to Section 7.4 has been added to Section 1.7.

Comment 5

The roles of the other agencies seem to be restricted to public participation. There are two issues with this text in the present document. First, at least two other agencies, EPA and DTSC, have regulatory responsibilities to insure that the cleanup protects the public health and safety. This role is critical and the CRP needs to place more emphasis on this regulatory responsibility. The other point is that the Army and contractors have the responsibility to involve the public in the process, and the present language in the CRP reads that other agencies may share that responsibility.

Response 5

The role of the BRAC Cleanup team is outlined in Sections 1.11 and 1.13. The text in these sections does not limit the BCT to public participation, but includes reference to the important agency roles of compliance, cleanup, protection of human health and the natural resources. In addition, Section 1.13 has also been revised to include the names of key non-BRAC Cleanup Team (BCT) regulatory agencies that review investigation and cleanup proposals. These include the Monterey Bay Unified Air Pollution Control District, California Department of Fish and Game, California State Parks, United States Fish & Wildlife Service, and Bureau of Land Management. The Army's role in community involvement is described in Section 1.12.

Specific Comments

Comment 6 Appendix P Responses to FOEJN Comments

A RAB should still be established at Fort Ord. There are no other forums for the roles that a RAB fills. The Army should evaluate why the previous RAB "was unable to fulfill its important responsibilities," and work to remedy those problems. Even a problematic RAB would be a much more effective means of community outreach than the current system of only CIWs and newsletters.

Response 6

As noted in our response to your comments in the Draft version, at the current time, the re-establishment of the Restoration Advisory Board is not under consideration. The Army, USEPA, DTSC and RWQCB made extensive efforts to remedy the RAB's problems. All efforts were fruitless. The summary results of the recent community survey does not indicate interest in a Restoration Advisory Board. Please note that 22 other outreach methods are outlined in Section 9.2 in addition to newsletters and Community Involvement Workshops.

Comment 7

We have noted many of the problems with the survey noted previously in this response. For example, 37 of the participants had only become aware of the cleanup the day of the survey or within the past year. The Army needs to acknowledge that the level of community participation and therefore outreach is not as high as it should be, and should look into additional means of community outreach such as the establishment of a RAB.

Response 7

Re-establishment of the Restoration Advisory Board is not supported by the results of the 2005 community survey. Various outreach events and community participation (attendance) is included in the Community Involvement Record in Appendix J. With regard to the survey results at the Fair, it should be noted we did not prohibit non-Monterey County residents from taking the survey. Nor did we require an address to validate their residency. As such we are not able to distinguish surveys from Monterey County residents. These results indicate we should continue our attendance at the Monterey County Fair since it is a key place to provide information to the community.

Comment 8

A brief description of FOEJN and a reference to the DoD policy on environmental justice does not constitute a plan for dealing with environmental justice issues. The barely 2 paragraphs in the text of this plan give no indication of how the Army intends to work with the community to resolve these matters, which is a requirement outlined in the policy paper included in Appendix I. In fact the Army seems to be only loosely following these police guidelines. For example, page 4 of the document states

“DoD will strengthen the community relations plan (CRP) as a tool to understand the socioeconomic makeup of the populations in and around its operations. Installations will combine data gathered from the U.S. Bureau of the Census and various databases...Where this data does not exist, DoD will coordinate with other Federal, state, local, and tribal governments to develop the data.”

The current CRP does not present any such information related to environmental justice. The Army needs to recognize that environmental justice issues are a serious concern of the community, and that many residents are concerned that they will be left out of the economic benefits that the restoration of the former Fort Ord might bring.

Response 8

Section 7.1.5 has been revised as recommended. Appendix F included the Census data for the socioeconomic makeup of the populations around Fort Ord. In addition, the census data for the adjacent communities was added as additional detail to Appendix F. Outreach, based on community concerns, is outlined in Section 9.2. The redevelopment and restoration of Fort Ord is a key issue of the Fort Ord Reuse Authority. The Fort Ord Reuse Authority’s reuse plan recognizes the economic challenges many families face in this area and attempts to address them by providing for workforce housing in the redevelopment of Fort Ord. Redevelopment is outside the purview of the cleanup, although the Army makes every attempt to accommodate scheduled development. References to the role of the Fort Ord Reuse Authority are included in Section 1.4.

Comment 9

One example is that the Fort Ord community includes a large number of Hispanic citizens and the Army could and needs to reach out to this community, using Spanish notices and even translators where appropriate.

Response 9

Section 8.1.6 has been revised to indicate that the phrase “Para obtener una copia en Espanol contacte 831-393-1284” will be added to all future Fact Sheets. We will

consider translating more fact sheets into Spanish based on the number of requests and will use translators when appropriate. The Community Relations Plan notes El Sol, the local Spanish language newspaper with the widest distribution in Monterey County. This is our resource for Spanish language announcements.

Comment 10

A list of “Community Relations Program Objectives” is not a community relations strategy, and is the only part of Section 9 that even resembles one. The rest of the section is devoted to explanations of the types of outreach, and not how they will work together to increase community involvement and participation. As this document is “the foundation for the Community involvement program,” it should be as detailed as possible and demonstrate a clearly articulated strategy for integrating the various forms of outreach to maximize their effectiveness.

Response 10

Section 9.2 has been revised to identify community relations activities related to each objective. Each action is matched with several objectives. The goal is that activities support objectives and address community concerns and allow multiple venues for community involvement with cleanup decisions.

Comment 11

While we appreciate the Army expanding its outreach efforts, more still needs to be done in this area, particularly for issues involving environmental justice and other “at risk” populations such as the sick and elderly.

Response 11

These communities are incorporated into the overall outreach program. For example, prescribed burn information is provided to care facilities for infants, the elderly and the chronically ill. We also work with the Monterey County Health Officer for distribution of health-related cleanup material that relates to the prescribed burn program. It is with the assistance of the Health Officer that prescribed burn-related materials are incorporated into ground rounds and provided to local health providers when necessary.

Comment 12

It should be noted that the format provided by EPA is not at all binding, and does not even have the standing of official guidelines. The former Fort Ord is an incredibly large and complex site, much more so than most other sites listed on the NPL, so the format may not be as applicable for Fort Ord. The document could be vastly improved by simply reorganizing the order of the sections. Given the incredibly important nature of this document, it would be inexcusable for the Army to release a confusing and difficult to read final document simply because it did not want to deviate from the format suggested in a generic toolkit. The Army should remember that when it does not clearly explain itself to the community, this can create unnecessary misunderstandings which can create and foster feelings of distrust in the community.

Response 12

No specific recommendations for reformatting were provided. The overall format is consistent with the US Environmental Protection Agency community outreach guidance.

Documents of this nature can be formatted in any one of several different ways and still fulfill the purpose.

Comment 13

The sections listed only refer to additional surveys and interviews performed for previous CRPs. They do not offer any insight regarding substantive changes to the CRP over time. FOEJN still contends that the CRP should include a specific section explaining these changes in detail.

Response 13

A summary of the key community involvement events is included in Section 7.2. And a summary of the site cleanup history is in Section 5 (for soil and groundwater cleanup) and Section 6 (for cleanup of munitions and explosives of concern). Since the initial (1991) version of the Fort Ord Community Relations Plan, the main change to the community outreach program is its expansion. Specific examples of additional outreach include a larger mailing list for distribution of key newsletters and prescribed burn information. The initial distribution was 13,000 copies and the current distribution goes to approximately 51,000 residents and businesses in the Monterey Bay and Salinas Valley communities. The door-to-door notifications have also become a more frequent part of the outreach program including door-to-door contact with residents of Seaside and Marina. A stronger relationship with California State University Monterey Bay news and information office has also resulted in newsletter saturation for all dormitory residents as well as information being posted on California State University Monterey Bay's popular, internal web area called Open Forum. The community involvement record is located in Appendix J and includes the list of significant events and also indicates attendance.

Comment 14

The fact remains that these methods are not effectively reaching the general public, as demonstrated by the low community turnout at cleanup related events. The Army should consider advertising in media other than "locally-oriented daily newspapers." In addition, community members respond when their voices are heard, when the subjects are relevant, when the citizens know of the meeting and it is held in a convenient location. Churches, schools, restaurants, and grocery stores are locations where community members may be reached and contacted to give information or receive feedback.

Response 14

Various outreach events and community participation (attendance) are included in the Community Involvement Record in Appendix J. In addition, the Fort Ord newsletters are regularly distributed to all businesses and residences in the surrounding Fort Ord communities including churches, schools, restaurants, and grocery stores.

Comment 15

This statement is important enough to deserve its own bullet point and not be combined with a statement about methods.

Response 15

Section 1.4 was revised as requested.

Section 1.4 included the following bullet point:

- Specify the activities, methods, and the recommended timing of community relations activities as well as specify cleanup staff responsible for sustaining the community relations program with the potential to sustain or increase public participation.

Comment 16

The appendix containing the raw data of the survey is insufficient. Text should be added to the document for ease of reference. The CRP should be as easy to read as possible.

Response 16

Sections 7.4.1 through 7.4.9 includes the results of the 2005 survey, interpretation of the results, and ways that that Army is addressing these community concerns. The survey tallies were included in Appendix K to show all data collected.

CORRECTIONS TO:
**Army Response to Comments on “Draft Community Relations
Plan, Update Number 3 Fort Ord, California” Prepared By
Environmental Stewardship Concepts
On Behalf of the Fort Ord Environmental Justice Network
December 29, 2005**

Original Comment 1: The Army should work aggressively to reestablish the Restoration Advisory Board (RAB). Impacted community residents felt the need to cleanup health hazards such as landfills, contaminated groundwater, thousands of acres of munitions, the quality of the air during burning, and a host of other problems of cleanup had to be traded because of the great need to create new employment opportunities, affordable housing, and the need to implement the local impacted community re-development plan. Impacted community members felt that their health impacts would not be addressed at all.

A Restoration Advisory Board (RAB) would give citizens a greater voice in the process, and place them in a position where they can advise the Army on the cleanup rather than simply comment on proposed or ongoing activities. The community involvement workshops are meant primarily share information with the public instead of influencing policy as done with a RAB. The more local citizens are empowered during the cleanup process the easier it will be for everyone.

Revised Response 1: The Army established the Fort Ord RAB in 1994 as a forum to exchange information and provide timely advice regarding environmental cleanup. Since its inception, the Army supported three major facilitation efforts to address the ineffectiveness of the RAB so that it could better fulfill its mission to advise the Army, regulating agencies, and the community. Unfortunately, facilitation efforts proved unsuccessful. Despite the significant efforts of many past members, the Fort Ord RAB was not able to fulfill its important responsibilities. Therefore, the Army dissolved the Fort Ord RAB in May 1999. Since then, by using information developed during the final facilitation effort and coordinating with the U.S. Environmental Protection Agency, California Department of Toxic Substances Control, and California Regional Water Quality Control Board, the Army has expanded its efforts to reach out to the community and is conducting enhanced quarterly public meetings, called Community Involvement Workshops, as a forum to present technical information, and discuss the environmental cleanup. Community members can comment, ask questions, receive information and reports, as well as suggest additional possibilities for community involvement. The Army encourages the participation of all community members in this and other types of outreach forums.