

Final
Record of Decision
No Action Regarding
Ordnance-Related Investigation
Former Fort Ord, California

June 19, 2002

United States Department of the Army
HQ, U.S. Army Garrison (Fort Ord)
Fort Ord, California 93941

CONTENTS

1.0	DECLARATION	1
1.1	Basis and Purpose	1
1.2	Site Assessment.....	2
1.3	Description of the Remedy.....	2
1.4	Statutory Determination	2
2.0	DECISION SUMMARY.....	6
2.1	Site Description.....	6
2.2	Site History.....	6
2.3	Enforcement and Regulatory History.....	6
2.4	Highlights of Community Participation.....	7
2.5	Scope and Role of No Action.....	7
2.6	Track 0 Process	7
	2.6.1 Track 0 ROD Process.....	7
	2.6.2 Track 0 “Plug-In” Process.....	8
2.7	Site Characteristics.....	8
	2.7.1 Definition of Track 0 Areas	8
	2.7.2 Track 0 Area Boundaries	9
	2.7.3 Track 0 “Plug-In” Areas.....	9
	2.7.4 Redefinition of Parcel Boundaries	9
	2.7.5 Definition of Non-Firing Areas.....	10
2.8	Description of Track 0 Areas	10
	2.8.1 Parcels S4.1.2.1, S4.1.2.2, S4.1.3, S4.1.4, and S4.1.5 – Highway 1 Area	10
	2.8.1.1 Background.....	10
	2.8.1.2 Site Investigation	10
	2.8.1.3 Rationale	11
	2.8.2 Parcel F2.7.2 – Golf Course Maintenance Area.....	11
	2.8.2.1 Background.....	11
	2.8.2.2 Site Investigation	11
	2.8.2.3 Rationale	12
	2.8.3 Parcel L27 – Brostrom Park Area	12
	2.8.3.1 Background.....	12
	2.8.3.2 Site Investigation	12
	2.8.3.3 Rationale	12
	2.8.4 Parcels E2c.1, E4.1.1, E4.2, E4.5, E5a, and a portion of E4.3.1.1 – Patton/Abrams Park Housing Area	13
	2.8.4.1 Background.....	13
	2.8.4.2 Site Investigation	13
	2.8.4.3 Rationale	15
	2.8.5 Parcels E15.1, L33.1, L33.2 and S1.4 – Open Space, Main Entrance Area.....	15
	2.8.5.1 Background.....	15
	2.8.5.2 Site Investigation	16
	2.8.5.3 Rationale	17
	2.8.6 Parcels L1.1, L19.2, L19.3, L19.4, L32.2.1, L32.2.2, L32.3, L32.4.1.1, L32.4.1.2, L32.4.2, L23.6, L36, L37, L15.1, L7.8, L7.9, L2.4.2, L2.4.3.1, L2.4.3.2, S1.3.1 – Surplus II Area.....	17

2.8.6.1	Background.....	17
2.8.6.2	Site Investigation	17
2.8.6.3	Rationale	18
2.8.7	Parcels S2.1.3, S2.1.4.1, S2.1.4.2, L5.1.2, L5.1.3, L5.1.4, L5.1.5, L5.1.6, L5.1.7, L5.1.8, L5.1.9, L5.1.10, L5.2, L5.3, F7.1, F7.2 – Fritzsche Army Airfield Area	19
2.8.7.1	Background.....	19
2.8.7.2	Site Investigation	19
2.8.7.3	Rationale	20
2.8.8	Parcels E11b.1, E11b.2, E11b.3, E11b.4, L20.14.1.2, L20.19.2, L20.20, L20.21.1, L20.21.2, L20.22, L23.3.1, L23.3.2.1, L35.3, L35.6, L35.7, and L35.8 – East Garrison Area.....	21
2.8.8.1	Background.....	21
2.8.8.2	Site Investigation	21
2.8.8.3	Rationale	22
2.8.9	Parcels E2b.1.1.1, E2b.1.2, E2b.1.1.2, E2b.1.3, E2b.1.4, E2b.1.5, E2b.2.1, E2b.2.2, E2b.2.3, E2b.2.4, E2b.2.5, E2b.3.1.1, E2b.3.2, E2c.2, E2c.3.1, E2c.3.2, E2c.3.3, E2c.4.1.1, E2c.4.2.1, E2d.1, E2d.2, E17, L2.1, L12.2.2, L12.2.3, L12.3, L23.1.1, L23.1.2, L23.1.3, L23.1.4, L23.1.5, L35.1, L35.2, L20.16.1, L20.16.2, L20.16.3, S1.5.1.1, S1.5.1.2, S1.5.2, L23.4, L2.2.1, L5.8.1, L5.8.2, L20.17.1 – Main Garrison Area	22
2.8.9.1	Background.....	22
2.8.9.2	Site Investigation	22
2.8.9.3	Rationale	23
2.8.10	Parcels E2e.1, E2e.2, E8a.1.2, E8a.1.3, E8a.1.4, E8a.1.5, S1.3.3, S2.5.1.1, S2.5.1.2, and Portions of Parcels S2.5.2.1 and S2.5.2.2 – OU 2 Landfill Area.....	24
2.8.10.1	Background.....	24
2.8.10.2	Site Investigation	24
2.8.10.3	Rationale	25
2.8.11	Parcels L5.10, L20.10.1.1, L20.10.1.2, L20.10.2, and L20.10.3 – Reservation Road Area	25
2.8.11.1	Background.....	25
2.8.11.2	Investigation Summary	26
2.8.11.3	Rationale	26
2.9	Documentation of Significant Changes.....	26
2.10	Summary of Site Risks.....	27
3.0	RESPONSIVENESS SUMMARY	28
3.1	Overview	28
3.2	Background on Community Involvement	28
3.3	Summary of Comments Received During the Public Comment Period and Department of the Army Responses.....	28
3.4	Summary of Comments.....	36
4.0	REFERENCES.....	38

TABLE

1 Track 0 Parcel Groupings

FIGURE

- 1 Track 0 ROD Process and Track 0 Plug-in Process

PLATES

- 1 Location Map – Former Fort Ord
- 2 Track 0 Parcel Map
- 3 Highway 1 Parcels
- 4 Brostrom Park and Golf Course Parcels
- 5 Patton/Abrams Park Housing Area Parcels
- 6 Open Space – Main Entrance Parcels
- 7 Surplus II Parcels
- 8 Fritzsche Army Airfield Parcels
- 9 East Garrison Parcels
- 10 Main Garrison Parcels
- 11 OU2 Landfill Parcels
- 12 Reservation Road Parcels

APPENDIX

- A Track 0 Checklist

TRACK 0 ROD

1.0 DECLARATION

The former Fort Ord is located near Monterey Bay in northwestern Monterey County, California (Plate 1). Since 1917, portions of the former Fort Ord were used by cavalry, field artillery, and infantry units for maneuvers, target ranges, and other purposes. Ordnance and explosives (OE) were fired into, fired upon, or used on the facility in the form of artillery and mortar projectiles, rockets and guided missiles, rifle and hand grenades, land mines, pyrotechnics, bombs, and demolition materials. Both unexploded ordnance (UXO) and OE scrap are present at parts of the former Fort Ord.

This No Action Record of Decision (ROD) addresses areas at the former Fort Ord that contain no evidence of OE and have never been suspected as having been used for OE-related activities of any kind based on current knowledge outlined in the Literature Review (HLA, 2000a) and investigated under the basewide Ordnance and Explosives Remedial Investigation/Feasibility Study (OE RI/FS) Program at former Fort Ord. The Track 0 process addresses single or grouped areas of land at the former Fort Ord that have no history of OE-related use and for which No Action is necessary to protect human health and the environment as described in the Track 0 Technical Memorandum (HLA, 2000b). A Special Case Track 0 area is also considered for No Action in this ROD. The Special Case area includes a former landfill where OE scrap items were found buried with refuse. No OE-related activities occurred in the area and the OE scrap items and the refuse were entirely removed.

The Track 0 Technical Memorandum provided the area- or parcel-specific rationale for assigning areas to Track 0 and served as the basis for the Track 0 Proposed Plan (HLA, 2000c). In response to agency and public comments received on the Proposed Plan, the process by which Track 0 parcels are identified was clarified and the information contained in the Technical Memorandum was expanded and

included in this ROD. These areas consist largely of land that has been developed for military support or residential use throughout Fort Ord's history and areas that have no physical or documented evidence of OE-related training. The No Action determination for these areas is documented through this Track 0 ROD that was prepared subsequent to the Technical Memorandum.

This ROD describes the Track 0 Process for Fort Ord and identifies the "Plug-In" process for identifying and managing the documentation process for future Track 0 (No Action) areas identified during the OE RI/FS. This ROD also identifies the areas to date that have been categorized as Track 0 areas and summarizes the background, site investigation history, and rationale for assigning each area to Track 0.

1.1 Basis and Purpose

This ROD is the decision document that presents the rationale for the selected No Action determination for the Track 0 Areas identified in the Literature Review performed as part of the basewide OE RI/FS Program at the former Fort Ord. No Action was selected for the Track 0 Areas in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended by the Superfund Amendment and Reauthorization Act (SARA), and the National Oil and Hazardous Substances Pollution Contingency Plan (NCP). This decision is based on information and reports contained in the Administrative Record for the former Fort Ord.

The United States Environmental Protection Agency (EPA) and the Department of Toxic Substances Control (DTSC), a part of the California Environmental Protection Agency (Cal/EPA), concur with the Army's No Action determination and the "Plug-In" process identified herein.

This decision is undertaken pursuant to the President's authority under CERCLA section 104, as delegated to the Army in accordance with Executive order 12580, and in compliance with the process set out in CERCLA section 120.

1.2 Site Assessment

No current or potential risks to human health and the environment posed by OE are present based on current knowledge outlined in the Literature Review (*HLA, 2000a*) performed as part of the basewide OE RI/FS Program and information obtained from other investigations at the former Fort Ord. The Track 0 process addresses single or grouped areas of land at the former Fort Ord that have no history of OE-related use and for which No Action is necessary to protect human health and the environment.

1.3 Description of the Remedy

Because there are no current or potential risks to human health and the environment posed by OE

at Track 0 areas, no remedial action is necessary in those areas. In the future, should any ordnance-related item be found within any of the areas addressed in this ROD, the Army will take an appropriate immediate action (i.e., removing the found item, recording the incident), and within 90 days of the discovery, submit a plan for appropriate follow-on action to EPA and DTSC for consultation, pursuant to Section 7.7(b) of the Fort Ord Federal Facility Agreement (FFA).

1.4 Statutory Determination

No remedial action is necessary to ensure the protection of human health and the environment.

RECORD OF DECISION
NO ACTION REGARDING ORDNANCE-RELATED INVESTIGATION
FORMER FORT ORD, CALIFORNIA

Signature Sheet for the foregoing Record of Decision for no action regarding ordnance-related investigation, Former Fort Ord, California, among the United States Army, the United States Environmental Protection Agency, and the California Environmental Protection Agency, Department of Toxic Substances Control.

Kevin M. Rice
Colonel, U.S. Army
Commander

Date

Gail Youngblood
BRAC Environmental Coordinator
Presidio of Monterey

Date

RECORD OF DECISION
NO ACTION REGARDING ORDNANCE-RELATED INVESTIGATION
FORMER FORT ORD, CALIFORNIA

Signature Sheet for the foregoing Record of Decision for no action regarding ordnance-related investigation, Former Fort Ord, California, among the United States Army, the United States Environmental Protection Agency, and the California Environmental Protection Agency, Department of Toxic Substances Control.

Deborah Jordan
Chief, Federal Facilities and Site Cleanup Branch
U.S. Environmental Protection Agency
Region IX

Date

RECORD OF DECISION
NO ACTION REGARDING ORDNANCE-RELATED INVESTIGATION
FORMER FORT ORD, CALIFORNIA

Signature Sheet for the foregoing Record of Decision for no action regarding ordnance-related investigation, Former Fort Ord, California, among the United States Army, the United States Environmental Protection Agency, and the California Environmental Protection Agency, Department of Toxic Substances Control.

Anthony J. Landis, P.E.
Chief of Operations
Office of Military Facilities
California Environmental Protection Agency
Department of Toxic Substances Control

Date

2.0 DECISION SUMMARY

2.1 Site Description

The Former Fort Ord is located near Monterey Bay in northwestern Monterey County, California, approximately 80 miles south of San Francisco. The base comprises approximately 28,000 acres adjacent to the cities of Seaside, Sand City, Monterey, and Del Rey Oaks to the south and Marina to the north. The Southern Pacific Railroad and Highway 1 pass through the western portion of former Fort Ord, separating the beachfront from the rest of the base. Laguna Seca Recreation Area and Toro Regional Park border former Fort Ord to the south and southeast, respectively, as well as several small communities such as Toro Park Estates and San Benancio.

2.2 Site History

Since the base was selected in 1991 for base realignment and closure (BRAC) and was officially closed in September 1994, site visits, historic and archival investigations, OE sampling, and removal actions have been performed and documented in preparation for transfer and reuse of former Fort Ord property. The Ord Military Community, located within the Main Garrison portion of former Fort Ord, will be retained by the Army. Since base closure in September 1994, lands outside the Ord Military Community have been subjected to the reuse process. Some of the property on the installation has been transferred. A large portion of the Inland Training Ranges was assigned to the Bureau of Land Management (BLM). Other areas on the installation have been or will be transferred to federal, state, local, and private entities through economic development conveyance, public benefit conveyance, negotiated sale, or other means.

2.3 Enforcement and Regulatory History

The reuse of the former Fort Ord following transfer of property increases the possibility of

the public being exposed to explosive hazards. In November 1998, the Army agreed to evaluate OE at former Fort Ord in an OE RI/FS consistent with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). A Federal Facility Agreement (FFA) was signed in 1990 by the Army, EPA, and the California Environmental Protection Agency's Department of Toxic Substances control (DTSC; formerly the Department of Health Services or DHS). The FFA established schedules for performing remedial investigations and feasibility studies and requires that remedial actions be completed as expeditiously as possible. In April 2000, an agreement was signed between the Army, EPA and DTSC to evaluate OE at the former Fort Ord subject to the provisions of the Fort Ord FFA.

The Army is preparing the OE RI/FS for Fort Ord to address OE-related hazards, which will include input from the community and require regulatory agency review and approval. The OE RI/FS will review and evaluate past investigative and removal actions, as well as recommend future response actions deemed necessary to protect human health and the environment on the basis of proposed reuses specified in the Fort Ord Reuse Authority (FORA) Reuse Plan.

Information will be gathered and evaluated during the OE RI/FS to categorize all areas of the former Fort Ord according to actions that have been taken or future remedial actions that are identified as necessary to mitigate explosive safety hazards associated with OE. The information will be evaluated with regard to site knowledge, the quality of the available information, work completed, and intended future land uses.

The OE RI/FS for the former Fort Ord will consider all property at the base in terms of past OE-related use and potential future explosive safety hazards as described in the OE RI/FS Work Plan (*USACE, 1999*). The OE RI/FS is organized as a "tracking" process whereby sites

with similar characteristics will be grouped to expedite cleanup, reuse, and/or transfer based on current knowledge.

This No Action ROD addresses areas on the former Fort Ord that have been identified as requiring no OE-related action to protect human health (public safety) and the environment, and are herein referred to as Track 0 areas. Other Track (1 through 3) areas will be addressed separately for the other lands that have or are suspected to have a history of OE-related use. An area is assigned to a specific track according to the level of OE investigation, sampling, or removal conducted to date as described in the OE RI/FS Work Plan (*USACE, 1999*).

OE RI/FS documents have been and will be prepared in cooperation with the regulatory agencies and will be reviewed and approved by the U.S. Environmental Protection Agency (EPA) and California Environmental Protection Agency Department of Toxic Substances Control (Cal/EPA DTSC). The documents also will be available for public review and comment.

2.4 Highlights of Community Participation

In February, 2000 the Army presented the Track 0 Proposed Plan for former Fort Ord to the public for review and comment (*HLA, 2000c*). The Proposed Plan presented the preferred alternative of No Action for each area and summarized information in the Technical Memorandum and other documents in the Administrative Record. These documents are available to the public at the following locations:

- Chamberlin Library, Building 4275, General Jim Moore Boulevard, Ord Military Community (formerly Fort Ord), California
- Seaside Branch Library, 550 Harcourt Street, Seaside, California
- California State University, Monterey Bay, Library Learning Center, 100 Campus Center, Building 12, Seaside, California.

The Administrative Record is available at Building 4463, Gigling Road, Ord Military Community (formerly Fort Ord), California, Monday through Friday from 9:00 a.m. to 3:00 p.m.

Comments on the Proposed Plan were accepted during a 30-day public review-and-comment period beginning on February 4, 2000. At the request of the public the comment period was extended from 30 days to 60 days, ending on April 4, 2000. A public meeting was held on February 16, 2000, at Building 4280 (Post Chapel), General Jim Moore Boulevard, Ord Military Community, California. At that time, the public had the opportunity to ask the Army and regulatory agencies questions and express concerns about the plan. In addition, written comments were accepted during the public comment period. Responses to comments received during the public comment period are included in the Responsiveness Summary presented in Section 3 of this document. Any significant changes to the Proposed Plan are included in Section 2.

2.5 Scope and Role of No Action

This No Action ROD documents that, with respect to OE, any necessary remedial actions consistent with CERCLA have been taken or that remedial action is not necessary for the areas that meet the Track 0 status as defined in Section 2.7. The scope of the No Action process is to identify areas where remedial action, with respect to OE, is not necessary to protect human health and the environment.

2.6 Track 0 Process

This section summarizes the documentation and management procedures for No Action areas identified in Section 2.8 of this ROD (Track 0 ROD process) and for subsequently identified No Action areas (Track 0 "Plug-In" process).

2.6.1 Track 0 ROD Process

Subsequent to the Technical Memorandum, the Track 0 Proposed Plan proposed No Action for

the Track 0 areas as described in the following section (Figure 1). Consistent with the requirements of CERCLA, notification of the proposed decision was published in a major local newspaper and distributed for public review. A 30-day public comment period, extended to 60 days, was provided and a public meeting held. This Track 0 ROD selecting the action, has been prepared by the Army for review and approval by the EPA and DTSC. The ROD identifies specific areas described in Section 2.8, currently meeting the No Action requirements.

2.6.2 Track 0 "Plug-In" Process

The Proposed Plan also proposed the "Plug-In" process for other areas that may be identified in the future for Track 0 (Figure 1). After the ROD is signed, No Action decisions for these future Track 0 areas will be proposed and documented in Approval Memoranda that describe the rationale for Track 0 designation.

The Approval Memorandum for each future Track 0 parcel or group of parcels will include the following:

1. A description of the area
2. A description of the historical use of the area
3. A rationale for the designation of an area as Track 0
4. A checklist summarizing the key elements of Track 0 documentation (see Figure 1 and Appendix A for an example checklist)
5. A map of the area detailing location and any pertinent available OE-related information.

Each Approval Memorandum will be made available for a 30-day public review period. Subsequently, when the Approval Memorandum is approved by regulatory agencies, a public notice will be posted in a local newspaper. Completed and planned No Action site determinations will also be described in the newsletter, the *Advance*, prepared by the Army

for local residents. When approved by the regulatory agencies, an Approval Memorandum for a specific Track 0 area will become the decision document for that area.

The Proposed Plans and RODs for Track 0 and other tracks, and all Approval Memoranda will be placed in the former Fort Ord Administrative Record and the local information repositories.

2.7 Site Characteristics

This section summarizes the Track 0 areas, how they are categorized, and what qualifies them for inclusion in the Track 0 process.

2.7.1 Definition of Track 0 Areas

Track 0 areas at the former Fort Ord are those that contain no evidence of OE and are not suspected as having been used for OE-related activities of any kind. These areas consist largely of land that has been developed for military support or residential use throughout Fort Ord's history and areas that have no physical or documented evidence of OE-related training. The locations of the Track 0 areas described in the Technical Memorandum are listed in Table 1 and shown on Plate 2. All Track 0 areas identified herein will be eliminated from further investigation under the OE RI/FS, on the basis of this ROD.

The decision for entering areas into the Track 0 process was based on the results of the literature review, documents referenced therein, and information obtained from site-specific activities and other activities where available. The main sources of information relied upon in evaluating an area's eligibility for Track 0 status included the following:

- The Literature Review Report (*HLA, 2000a*)
- The Revised Archives Search Report (ASR) (*USAEDH, 1997b*)
- The Community Environmental Response Facilitation Act (CERFA) Report (*Little, 1994*)

- The Basewide Remedial Investigation/Feasibility Study (Basewide RI/FS) (HLA, 1995d).

The literature review process included gathering and reviewing files from multiple sources. Previous investigations at the former Fort Ord that documented OE-related activities were reviewed along with historical records. Historical records reviewed included range control files, historical maps, aerial photographs, historical film footage, real estate records, and newspaper articles. Interviews were conducted with retired military personnel, active Corps of Engineers employees, active enlisted and civilian personnel that served at the former Fort Ord, and OE contractors. Other factors considered included physical location of an area, development history, and the results of the remedial investigation and excavation activities at Installation Restoration Program (IRP) sites.

The Archives Search investigation involved extensive records search of the former Fort Ord related ordnance documentation and a visual inspection of ordnance sites identified. Records reviewed included aerial photographs, National Archives records, local government and historical records, and Fort Ord fire department records. The Archives Search also included interviews with current and former employees.

The CERFA investigation included a search of government records, a review of recorded chain of title documents, a review of aerial photographs reflecting prior uses, a visual inspection of the former Fort Ord, physical inspection of and review of information for adjacent properties and interviews with current or former employees.

The Basewide RI/FS included a review of previous investigations at the former Fort Ord and extensive field investigation activities at several of the Track 0 areas. RI/FS documentation was reviewed and utilized in the delineation of the Track 0 areas. A checklist was developed to highlight the main sources of information used in evaluating each of the areas for Track 0 status as shown in Appendix A.

2.7.2 Track 0 Area Boundaries

Because of the base's large size, long history, multiple uses, and myriad of programs under which records have been kept, one of the main goals of the OE RI/FS process has been to assemble information from numerous sources regarding land use. Hundreds of records, maps, and aerial photographs spanning approximately 80 years were consulted regarding the multiple uses of the former Fort Ord lands. From these sources, Track 0 areas were given their current boundaries.

2.7.3 Track 0 "Plug-In" Areas

Other areas or groups of areas may be identified in the future as being eligible for Track 0, after further research has been completed and OE site boundary locations have been clarified in the OE RI/FS. The area(s) will be proposed for Track 0 through a "Plug-In" process by which an Approval Memorandum will be prepared that presents rationale for designating the area(s) as Track 0. When approved by the regulatory agencies, the Approval Memorandum will become the decision document for the specific area(s). Section 2.6 summarizes the documentation and management procedures to be followed during the "Plug-In" process.

Track 0 areas and their boundaries may be redefined under several different scenarios in the future and thereby qualify for inclusion in the "Plug-In" process. Two of these scenarios, Redefinition of Transfer Parcel Boundaries and Definition of Non-Firing Areas, are discussed in the following sections.

2.7.4 Redefinition of Parcel Boundaries

The OE RI/FS process may identify the need for further site reconnaissance in some areas of the former Fort Ord where current data are not adequate for a complete evaluation of explosive safety hazards associated with OE. On the basis of results of future OE-related information that

may be collected, parcels can be subdivided to isolate non-OE areas.

2.7.5 Definition of Non-Firing Areas

The Track 0 process was defined for areas at the former Fort Ord where no OE-related activities were known or suspected to have occurred. The term “OE-related activities” was given an intentionally broad definition to take a conservative approach in evaluating all available information and considering which areas at former Fort Ord may have possibly been used for any military activities where OE could have been used. Some of these areas include non-firing training areas where Army personnel were given preliminary training in the use of weapons, but the weapons were never fired.

These areas will be researched thoroughly in the OE RI/FS for information relating to the occurrence of live fire activities. If site conditions clearly indicate no live fire was conducted at a given area (e.g., buildings are nearby; range fans necessary for safely conducting live fire practice are absent), these areas will be eligible for the Track 0 plug-in process.

2.8 Description of Track 0 Areas

This section provides the background, investigative summaries, and rationale for designation of each area as a Track 0 (No Action) area. Areas were grouped geographically: e.g., all non-OE land in the Main Garrison was grouped and discussed together as one area. The Army subdivided former Fort Ord into parcels of land for the purposes of property transfer. The parcels were assigned numbers for identification. To supplement future property transfer, descriptions of the Track 0 areas include discussions of the parcels that occupy the same geographical areas. A checklist was developed to highlight the main sources of information used in evaluating each of the areas for Track 0 status as shown in Appendix A.

2.8.1 Parcels S4.1.2.1, S4.1.2.2, S4.1.3, S4.1.4, and S4.1.5 – Highway 1 Area

2.8.1.1 Background

These parcels consist of Highway 1 and the associated Highway 1 easements from the northern to southern former Fort Ord boundary. The combined parcel area is approximately 161 acres (Plate 3). Highway 1 and the adjacent rail line have been in roughly the same position since the Army began acquisition of adjacent land in 1917. The land upon which these parcels now lie was purchased by the Army in 1940. Significant construction occurred to the highway with the purchase of the property and included an expansion to 4 lanes and the re-location of the adjacent rail line.

2.8.1.2 Site Investigation

Based on the results of the Archives Search investigation, the Literature Review, the Site 39 Data Summary and Work Plan, the CERFA investigation and information obtained from other activities no OE sites were identified on the parcels. Two potential sites (Sites OE-20 and OE-22) lie immediately adjacent to the Track 0 parcels (Plate 3). Site OE-20 (a recoilless rifle training area), was identified through the archives search. The boundary of the OE site is based on the delineation of the training area on a the former Fort Ord training facilities map from 1957. An OE contractor conducted sampling of the site and no evidence of OE was found (*HFAI, 1994*). Site OE-20 will undergo additional evaluation in the OE RI/FS.

Site OE-22, the Beach Ranges, were small arms ranges located along the former Fort Ord beachfront. Firing at the ranges was toward the west away from the Track 0 parcels. Sampling of Site OE-22 was preformed in 1993-1994. Numerous live small arms and several OE scrap items (fins from a 60mm mortar, an inert training grenade, expended smoke grenade and grenade fuze and a 40mm cartridge case) were found (*HFAI, 1994*). Additional sampling

(Gridstats/Sitestats) was completed in 1997 and one scrap item (unfuzed Japanese-made mortar) was found (*USA, 1999d*). No UXO was found during either sampling effort. Site OE-22 will undergo additional evaluation in the OE RI/FS.

One former training area, a machine gun square, overlaps a portion of Parcel S4.1.2.1 near the former Fort Ord main entrance. No evidence has been found that would support the use of OE at the machine gun squares (*HLA, 2000*). The machine gun squares were located within developed areas of former Fort Ord, adjacent to main roads, military housing, and other military facilities.

2.8.1.3 Rationale

OE is not likely to be present on these parcels for the following reasons:

- Highway 1 and the rail line have been in the same general location since the property was obtained by the Army
- A review of the former Fort Ord ordnance related investigations including the Archives Search Report (ASR), the Literature Review, the Site 39 Data Summary and Work Plan, the HFAI OEW Sampling OEW Removal Action Final Report for Site OE-20, and the Site OE-20 After Action Report, indicates the parcels were not used for ordnance training
- OE sampling at Site OE-20 found no evidence of OE
- Expansion of Highway 1 to four lanes involved significant grading and earth movement, and no record of OE exists
- OE sampling at Site OE-22 identified only OE scrap items.

2.8.2 Parcel F2.7.2 – Golf Course Maintenance Area

2.8.2.1 Background

This parcel consists of approximately 2 acres in the maintenance area of the former Fort Ord golf courses (Plate 4). The property includes two buildings (4110 and 4109) used for general maintenance and storage to support the golf course. The Army purchased the property in 1940, housing was constructed nearby in 1941 and 1942, and the golf course was constructed in 1953. Prior to construction of the golf course the parcel lay on undeveloped land.

2.8.2.2 Site Investigation

No evidence of ordnance use was identified on this parcel during the Archive Search, the Literature Review, the Site 39 Data Summary and Work Plan and the CERFA investigation.

In 1993 the parcel was included in a remedial investigation for pesticides and PCBs related to past activities occurring at the maintenance facility. The investigation included the completion of 8 soil borings to depths of 5 to 10 feet. In 1994 an area within the parcel of approximately 1,870 square feet was excavated to depths ranging from 1 to 41 feet below ground surface (bgs) as part of an underground storage tank (UST) investigation adjacent to Building 4110 (*HLA, 1997d*). Field personnel trained in ordnance recognition supervised the excavation of the former UST site. No evidence of OE was found during the remedial investigation or the UST investigation at this parcel.

Other investigations have involved site walks of the parcel including the Solid Waste Management Unit (SWMU) investigations in 1995 and 1996, and a 1997 site visit supporting the proposed real estate transfer of this parcel in 1997. No evidence of OE was observed during these site visits. Field personnel trained in ordnance recognition performed the site walk for the real estate transfer.

2.8.2.3 Rationale

OE is not likely to be present on this parcel for the following reasons:

- A review of former Fort Ord ordnance related investigations including the ASR, the Literature Review and the Site 39 Data Summary and Work Plan indicates the parcel was not used for ordnance training
- The results of the former Fort Ord CERFA investigation included a site walk, inspection of the buildings on the parcel, and a review of the former Fort Ord related documentation including documents pertaining to ordnance use, and found nothing to indicate the presence of OE
- The property was purchased by the Army in 1940, housing constructed nearby beginning in 1941 and the golf course was built in 1953
- Investigations completed under the Basewide RI/FS and UST programs, which included intrusive activities, found no evidence to indicate the use of ordnance on the parcel
- No evidence of OE use was found during several site walks of the parcel.

2.8.3 Parcel L27 – Brostrom Park Area

2.8.3.1 Background

This parcel, approximately 52 acres, lies in the southwest portion of the former Fort Ord adjacent to the City of Seaside (Plate 4). The parcel currently includes the Brostrom Park housing area. The property was purchased by the Army in 1940. Housing (Ord Village) was constructed on this parcel and on adjacent Army property in 1941 and 1942. The Hayes Park housing area was built immediately north of Parcel L27 in 1952. Based on a review of aerial photographs, Ord village was demolished in the early 1960s and with the exception of the construction of a baseball field in the mid 1960s,

the parcel lay undeveloped until 1984 when the Brostrom Park housing area was constructed. After the demolition of the Ord Village housing area, Seaside High School was constructed on adjacent Army property that had also previously contained a portion of the Ord Village housing area.

2.8.3.2 Site Investigation

No evidence of ordnance use was identified on this parcel during the Archives Search investigation, the Literature Review, the Site 39 Data Summary and Work Plan and the CERFA investigation.

A portion of Parcel L27, IRP Site 37 underwent an investigation related to a reported chemical release, under the Basewide RI/FS program. No evidence of OE was reported during the site investigation activities that included a site walk, soil boring installation and sampling. Additionally, a site walk was performed on Parcel L27 in 1996 in support of the proposed transfer of this parcel. No evidence was found during the site walk that would indicate the use of ordnance on this parcel.

2.8.3.3 Rationale

OE is not likely to be present on this parcel for the following reasons:

- A review of the former Fort Ord ordnance related investigations including the ASR, the Literature Review, and the Site 39 Data Summary and Work Plan indicates that the parcel was not used for ordnance training;
- A housing area, adjacent to the City of Seaside, was constructed on this parcel immediately after purchase of the property by the Army;
- The results of the former Fort Ord CERFA investigation, which included a site walk of the Brostrom Park housing area and a review of Fort Ord related documentation including documents pertaining to ordnance;
- Investigations completed under the former Fort Ord Basewide RI/FS program that

included intrusive activities found no evidence to indicate the use of ordnance on the parcel;

- No evidence of ordnance use was found during several site walks of this parcel.

2.8.4 Parcels E2c.1, E4.1.1, E4.2, E4.5, E5a, and a portion of E4.3.1.1 – Patton/Abrams Park Housing Area

2.8.4.1 Background

These parcels lie in the northwest corner of the former Fort Ord and consist of the Patton Park housing area (Parcels E4.1.1 and E4.2), the Abrams Park housing area (Parcel E4.3.1.1), a water treatment and storage facility (Parcel E4.5), and an adjacent open field (Parcel E5a; Plate 5). These parcels were included in property that was purchased by the Army in 1940. Water supply wells were constructed within Parcel E4.1.1 beginning in 1940. The Patton Park housing area was constructed between 1962 and 1969. The Abrams Park housing area was constructed between 1978 and 1982. A small portion of Parcel E4.3.1.1 was used as sanitary landfill (Area A) from 1956 to 1966 (*HLA, 1990*). The portion of Parcel E4.3.1.1 that was used as a landfill is not included in the Track 0 parcels. The combined parcel area is approximately 460 acres. A review of the former Fort Ord training facilities maps and ordnance related documentation indicates that several non-OE training areas were present within some of the parcels (*HLA, 2000*).

2.8.4.2 Site Investigation

Based on the results of the Archives Search investigation, the Literature Review, the Site 39 Data Summary and Work Plan and the CERFA investigation, three training areas were identified on the parcels. Three potential OE sites, Site OE-1, Site OE-2 and Site OE-13A lie adjacent to Parcels E4.1.1 and E2c.1 and Parcel E4.3.1.1, respectively.

Site OE-13A was identified as a practice mortar range through the Archives Search process. Based on the review of former Fort Ord training facilities maps from the middle to late 1950s, the ASR identified a single point location and a potential area to be investigated. Approximate site boundaries were assigned as part of the ASR and the site was identified as Site OE-13A. In an interview, a former Fort Ord Deputy Director of Logistics (1958 to 1961) stated that the practice mortar range was a non-firing area and no firing of live items would have occurred (*USACE, 2001*).

The boundary of Site OE-13A as identified in the ASR is partially within the current Abrams Park housing area and partially overlies a former landfill (Area A). The earliest housing construction within Abrams Park was completed in 1978 and involved the removal of up to 25 feet of soil and landfill material from various areas (*USACE, 2000*). Construction and grading is evident on 1978 aerial photographs. No evidence of OE was found outside of Area A during construction of Abrams Park (*HLA, 2000*).

As discussed above, Area A was used as a sanitary landfill in the 1960s. Excavation of landfill material within Area A was conducted in 1996 through 1998 as part of the relocation of that portion of the OU 2 landfill. The excavation included the entire limits of Area A, including the overlapping portion of Site OE-13A. During the excavation numerous OE scrap items were found. The items were either removed or destroyed in place (*IT, 1999c*), however no live OE was found. All landfill disposal areas, including land within the OE footprint, have been excavated. The excavated areas have been backfilled and re-graded. Although OE items were found within landfill materials excavated from Area A, the items were related to disposal within these parcels and were not associated with ordnance use at Site OE-13A.

Sampling for OE was conducted at Site OE-13A. An OE contractor completed the initial sampling of the site in 1994 and found no evidence of OE use (*HFAI, 1994*). Based on the

intended future land use of Site OE-13A, the Phase 1 Engineering Evaluation and Cost Analysis (EE/CA) recommended additional confirmatory sampling. In 1997 an OE contractor resurveyed a portion of the 1994 sample grids and the OE site boundary using GPS technology. Two additional confirmatory sample grids were established and sampled. Because twenty grids within the site had already been sampled and the western end of the site (landfill) was being excavated, the two grids were located just outside of the OE site at its eastern end. Two OE scrap items (expended grenade fuze and an expended illuminating signal) were found in one of the two sample grid locations. The two grids were not located in Track 0 areas. As shown on Plate 5, developed land separates Site OE-13A and adjacent Track 0 Parcel E4.3.1.1. Site OE-13A will undergo additional evaluation in the OE RI/FS.

Site OE-1 is located adjacent to Track 0 Parcels E4.1.1 and E2c.1. Site OE-1 was identified as a flame thrower range on Fort Ord training facilities maps from the late 1950s and early 1960s. An OE contractor conducted sampling of Site OE-1 in 1994 and found one inert practice mine (OE scrap) (HFAI, 1994). Eight additional grids were sampled in the area between Site OE-1 and adjacent Site OE-6 and four inert practice mines (OE scrap) were found. In accordance with recommendations in the Phase 1 EE/CA, confirmatory sampling was then conducted. In 1997 the OE contractor resurveyed the Site OE-1 grid locations and the site boundary. In February 1998 three additional grids were sampled and no evidence of OE was found (USA, 1999b). Expanded site boundaries for Site OE-1 were established through the ASR dated 1997, and four additional grids were sampled in open areas within the expanded site. Three OE scrap items, expended practice mine fuzes and an expended flame thrower ignition cartridge, were found. As shown on Plate 5, developed land separates Site OE-1 and adjacent Track 0 Parcels E4.1.1 and E2c.1. Site OE-1 will undergo additional evaluation in the OE RI/FS.

Site OE-2, Pete's Pond is located adjacent to Parcel E4.3.1.1 (Plate 5). Site OE-2 was

identified as a chemical training area and a landmine warfare training area (USAEDH, 1997b). Site OE-2 was sampled for OE in 1994 and two inert OE scrap items were found (HFAI, 1994). Site OE-2 will undergo additional evaluation in the OE RI/FS.

Proficiency Testing Area 2, located within Parcel E4.1.1, was identified on a circa 1954 training facilities map. An interview with a former range control officer indicated that proficiency test areas were used to test a soldier's proficiency in breaking down and setting up weapons. According to the former range control officer, the proficiency test areas were not used for live firing exercises (HLA, 2000). No evidence has been found that supports the use of live ammunition in the proficiency test areas.

A mortar square was located within Parcel E4.1.1. The mortar square was identified on training facilities maps from the 1950s and 1960s. No evidence has been found that would support the use of live ordnance at the mortar squares (HLA, 2000).

The Wire Entanglement Area, a physical training area, was shown on 1945 and 1946 Fort Ord Master Plan maps. The Wire Entanglement Area was located in the northern portion of Parcel E4.2. No further information regarding its use was available.

The three training areas described above were located adjacent to developed areas of former Fort Ord near housing areas and actively used roads. No range fans, typically associated with live fire areas, were shown on the historic maps associated with the three training areas. Additionally, all three training areas are within an area designated on 1945 and 1946 Fort Ord Master Plan Maps as a "Well Area, No Artillery Firing Or Demolitions," and within a "restricted fire area" identified on a 1956 training map.

The Site 39 Data Summary and Work Plan identified an area, 75mm Pack Howitzer Firing Area, which overlaps Track 0 Parcel S4.1.1. The identification of this area is based on the results of an interview with a retired Fort Ord

military engineer (HLA, 1994b). The engineer stated that he had heard that this area was used in the early 1900s by cavalry stationed at the Presidio of Monterey. No evidence to support the use of this area for Howitzer firing was found during the archive search and the literature review. The land was not purchased by the Army until 1940. Two OE Sites (1 and 6) fall within the area delineated as the 75mm Pack Howitzer Firing Area. Field investigations in and around Sites OE-1 and OE-6, which included site walks, a GPS survey of the OE site boundaries and OE sampling, turned up no evidence of 75mm Howitzer use (HFAI, 1994; USACE, 1999).

A suspect training area was identified on a 1949 aerial photo within Parcel E5a (SCS, 1949). None of the previously completed OE historical searches identified a training area in this vicinity at that time. A light vehicle driving course had been established on the eastern side of Parcels E5a by 1961 (USACE, 1961). A site walk of Parcel E5a was completed by a U.S. Army Corps of Engineers (USACE) UXO Safety Specialist and no UXO or OE scrap was found.

2.8.4.3 Rationale

OE is not likely to be present on these parcels for the following reasons:

- A review of former Fort Ord ordnance related investigations including the ASR, the Literature Review, and the Site 39 Data Summary and Work Plan indicates that these parcels were not used for ordnance training
- OE sampling was conducted at Site OE-1 (adjacent) and only OE scrap items were found
- OE sampling at Site OE-13A (adjacent) found no evidence of an impact area
- A former Fort Ord Deputy Director of Logistics stated that Site OE-13A was a non-firing area and no firing of items would have occurred

- Developed land separates the boundaries of Sites OE-1 and OE-13A from nearby Track 0 parcels
- Training areas identified within the parcels were located adjacent to developed areas on former Fort Ord, as well as the nearby City of Marina
- The majority of the area was graded as part of the construction of the housing areas and no evidence of OE was found outside of Area A
- Water supply well construction began within portions of the parcels at the time of initial land purchase in 1940 continuing into the 1950s. Approximately half of the area is located within an area identified on 1945 and 1946 Fort Ord Master Plan maps as a “Well Area, No Artillery Firing Or Demolitions” and the remainder within a “restricted fire area” identified on 1950s training maps
- No UXO or OE scrap was found on Parcel E5a during a site walk completed by a USACE UXO Safety Specialist
- No evidence of OE use was found during the former Fort Ord CERFA investigation, which included a site walk, inspection of the buildings on the parcels, and a review of the former Fort Ord related documentation (including documents pertaining to ordnance use).

2.8.5 Parcels E15.1, L33.1, L33.2 and S1.4 – Open Space, Main Entrance Area

2.8.5.1 Background

These parcels lie in the west-central portion of the former Fort Ord near the former main entrance. The parcels include open space and developed areas that were formerly used as an airstrip, parade grounds, physical training and weapons training areas, and the post engineering facility. The combined parcel acreage is

approximately 201 acres (Plate 6). Initial development on these parcels began at the time of property purchase in 1940 and included the construction of a review field (South Parade Ground) on Parcels L33.1 and L33.2 (*Army, 1940a*). A portion of the South Parade Ground was converted to an airstrip in the late 1940s. Development also included the post engineering facility (Directorate of Engineering and Housing), a motor pool, and maintenance and support buildings (Parcels L33.1 and S1.4) in 1941-43. An athletic stadium was constructed immediately north of the South Parade Grounds in 1951 (*FASI, 1951*).

All four parcels lie within an area designated as a "Well Area, No Artillery Firing Or Demolitions" as shown on the 1945 Fort Ord Training Facilities map (*Army, 1945*). Parcel E15.1 also lies within a "restricted fire area" identified on a 1956 training map. Development continued during the 1960s through the 1980s with the construction of a bank, bowling alley, athletic fields, a running track, and the current main entrance and road. Areas used for weapons training included rifle instruction circles and machine gun squares established in Parcels E15.1 and S1.4.

2.8.5.2 Site Investigation

In 1993, a 100-pound concrete-filled, unfuzed training bomb was found at Site OE-18 approximately 4,000 feet to the east of Parcel S1.4. The training device was found in an area that was used previously for emergency and EOD training (*HLA, 1994b*). Fourteen sample grids were established in and around Parcels S1.4, L33.1, and E15.1 in 1994 to investigate the potential presence of additional bombs related to the former airfield on Parcel L33.1 and L32.2. Nine of the 14 sample grids were located within Track 0 parcels (Plate 6). The grids were sampled, and no evidence of OE was found (*HFAL, 1994*).

Extensive field work including site walks, soil boring investigations, geophysical surveying, trenching and soil excavations at IRP Sites 20, 23, and 24 have taken place within portions of the parcels. These areas were investigated for

the presence of chemical contamination under the Basewide RI/FS program. Trenching activities completed to investigate geophysical anomalies identified through the site characterization of IRP Site 20 were completed within Parcel E15.1 (*HLA, 1995a*). The trenches were excavated by UXO specialists. No evidence of OE was found during this investigation.

The IRP Site 23 investigation focused on the motor pool located in the northern portion of Parcel S1.4. The investigation included site walks and the installation of several soil borings (*HLA, 1997c*). No evidence of OE was found during this investigation.

The IRP Site 24 investigation focused on the former Directorate of Engineering and Housing (DEH) yard and included soil borings, geophysical survey, trenching and soil excavations (*HLA, 1997b*). Trenches excavated to investigate geophysical anomalies identified through the site characterization of IRP Site 24 were completed within Parcels L33.1 and S1.4 (*HLA, 1996c*). The trenches were excavated by UXO specialists. No evidence of OE was found during this investigation. Site characterization activities identified three interim action (IA) areas requiring further investigation. Four soil excavations totaling approximately 13,160 square feet were completed within IRP Site 24 (Parcels L33.1 and S1.4). Field personnel trained in ordnance recognition supervised the completion of the excavations. No evidence of OE was found during this investigation.

Additionally, an approximately 1,980-square-foot excavation located in Parcel L33.1 related to the investigation and remediation of a hydrocarbon release associated with UST 3803 was completed (*HLA, 1997a*). Field personnel trained in ordnance recognition supervised the excavation of the former UST site. No evidence of OE was found during the UST excavation.

Investigations involving the Fort Ord SWMU program and property transfer included site walks of the property. No evidence has been found to indicate the use of ordnance on these parcels.

2.8.5.3 Rationale

OE is not likely to be present on these parcels for the following reasons:

- A review of former Fort Ord OE-related investigations including the ASR, the Literature Review, the Site 39 Data Summary and Work Plan and the OE Sampling, and the HFAI OEW Sampling, OEW Removal Action Final Report, indicates the parcel was not used for ordnance training
- OE sampling on Track 0 Parcels S1.4, L33.1, and E15.1 found no evidence of OE
- Construction/development began on portions of the parcels immediately after purchase of the property by the Army
- The results of the former Fort Ord CERFA investigation included a site walk on the developed portions of the parcels and a review of the former Fort Ord related documentation including documents pertaining to ordnance use, and found nothing to indicate ordnance use
- No evidence of ordnance use was found during several site walks of these parcels
- Investigations completed under the Basewide RI/FS program that included geophysical surveys, trenching and excavations, found no evidence to indicate the use of ordnance on the parcel
- The area has been in use since it was purchased in 1940 and no evidence of OE has been found.

2.8.6 Parcels L1.1, L19.2, L19.3, L19.4, L32.2.1, L32.2.2, L32.3, L32.4.1.1, L32.4.1.2, L32.4.2, L23.6, L36, L37, L15.1, L7.8, L7.9, L2.4.2, L2.4.3.1,

L2.4.3.2, S1.3.1 –
Surplus II Area

2.8.6.1 Background

These parcels are located in the central and eastern portion of the Main Garrison (Plate 7). These parcels include former barracks, support facilities, motor pools, and recreational facilities. The combined parcel area is approximately 175 acres. This property was purchased by the Army in 1940. All the parcels appear to lie within an area designated as a “Well Area, No Artillery Firing or Demolitions” as shown on the 1945 Fort Ord Training Facilities map (*Army, 1945*). Development began in the mid 1950s with some buildings dating back to 1954. Review of 1951 aerial photographs indicated that the area was undeveloped prior to the mid 1950s. Review of the 1956 aerial photograph indicated barracks were present in portions of Parcel L32.2.2 and L7.8 and L7.9, along with several other buildings (Parcel L19.4). Construction of the motor pool east of the barracks, Parcel S1.3.1, was also started in 1956. Two training areas, a rifle instructional circle and a machine gun square, were present in the southeastern portion of this area, Parcels L32.2.1 and S1.3.1, in 1956. Review of aerial photographs and training maps from the 1960s and early 1970s (*SCS, 1966; USACE, 1974; Army, 1964, 1967*) indicate that the area west of the barracks was mostly open space and the area east of the barracks (Parcels L32.2.1 and S1.3.1) was used for training. Several areas are labeled as physical training areas on 1960s training maps. Development of this area continued in the 1970s and 1980s with the construction of additional support buildings and recreational facilities.

2.8.6.2 Site Investigation

Four OE sites have been identified in the vicinity of this area, Sites OE-4A, OE-13B, OE-31, and OE-39. Site OE-4A was identified as a Chemical, Biological, and Radiological (CBR) Training Area on historical maps. Sampling of this site resulted in the discovery of 1 rifle grenade, 2 illumination signals, as well as

67 grenade fuzes found in a burial pit. On the basis of the sampling results, the site received a 4-foot-deep removal. One UXO item (illumination signal) was found and removed during the removal action (USA, 1999c). As shown on Plate 7, an undeveloped area separates the northern boundary of Site OE-4A and Track 0 Parcels L2.4.3.1, L2.4.2 and L32.4.1.2.

Site OE-13B was identified in the Archives Search Report (USAEDH, 1997b) as a practice mortar range. The site was identified on training facilities maps in the 1950s. The boundaries of the site were defined and OE sampling was performed. Sampling of the site confirmed that the site had been used extensively as an OE training area. On the basis of the sampling results a removal action over the entire site was performed. UXO items found included pyrotechnics, smoke grenades and projectiles of various sizes. During the removal action two partial Chemical Agent Identification Sets (CAIS) were found. Two cardboard tubes containing intact glass vials were discovered inside of metal canisters buried at depths of 1 and 1.5 feet. The sets were removed by the Technical Escort Unit of Tooele Utah and transferred to their facility (USA, 2000). Based on the presence of established developed areas from the 1950s west of the site, it is expected that any live firing occurring on the site would have been directed toward the east away from the developed area. Site OE-13B is separated from the adjacent Track 0 parcels by a road. Site OE-13B will undergo additional evaluation in the OE RI/FS.

Site OE-31, CSU Footprint, was identified as the result of impending Base Realignment and Closure (BRAC) action and encompasses Sites OE-7, OE-8, OE-4C, OE-18, and a portion of OE-13B. Three and four foot removals have been conducted throughout the OE sites. Although several burial pit caches of ordnance were found and removed, the ordnance actually fired at the CSU Footprint was apparently limited to rifle grenades. UXO items found during the OE removal actions included smoke grenades, fuzes, pyrotechnics (e.g., flares), and practice mines (HFAI, 1994). Based on the presence of established developed areas west of

the site it is expected that any live firing would have been toward the east away from the developed areas. Site OE-31 is separated from the adjacent Track 0 parcels by a road. Site OE-31 will undergo additional evaluation in the OE RI/FS.

Site OE-39 is located to the south of Track 0 Parcel L32.4.1.2. Site OE-39 was identified in the ASR (USAEDH, 1997b) as a mine and booby trap training area. The boundary of the OE site was established based on the delineation of a training area on former Fort Ord training facilities maps from the 1950s. The training area was identified as an area for further investigation. An ordnance removal contractor established sample grids within the site and sampling was performed. No evidence of OE was found and no further action was recommended (USA, 1999a). As shown on Plate 7, developed land separates the Site OE-39 boundary and Track 0 Parcel L32.4.1.2. Site OE-39 will undergo additional evaluation in the OE RI/FS.

Extensive field work including site walks, soil boring investigations and soil excavations at IRP Site 22 has taken place within portions of Parcel S1.3.1. This area was investigated for the presence of chemical contamination under the Fort Ord Basewide RI/FS program. No OE items were encountered during completion of these investigations.

Additionally, an approximately 8,000 square foot excavation located in Parcel S1.3.1 related to the investigation and remediation of hydrocarbon releases associated with UST 4534 and Grease Rack 4532 was completed. Field personnel trained in ordnance recognition supervised the excavation of the former UST site. No evidence of OE was found in the excavation.

2.8.6.3 Rationale

OE is not likely to be present on these parcels for the following reasons:

- A review of former Fort Ord related investigations including the ASR, the

Literature Review, and the Site 39 Data Summary and Work Plan indicates that these areas were not used for ordnance training

- OE sampling at nearby Site OE-39 found no evidence of OE
- OE removal actions have been conducted at nearby Sites OE-4A, OE-13B and OE-31
- Sites OE-4A, OE-13B, OE-31, and OE-39 are separated by roads, open space or developed areas, from the Track 0 parcels
- The areas have been developed since the 1950s and no evidence of OE has been found
- The results of the Fort Ord CERFA investigation which included a site walk on the developed portions of the parcels and review of Fort Ord related documentation including documents pertaining to ordnance use, found nothing to indicate ordnance use
- Investigations completed under the Fort Ord Basewide RI/FS program that included excavations and intrusive activities, found no evidence to indicate the use of ordnance on the parcels.
- No evidence of ordnance was found during several site walks of these parcels.

2.8.7 Parcels S2.1.3, S2.1.4.1, S2.1.4.2, L5.1.2, L5.1.3, L5.1.4, L5.1.5, L5.1.6, L5.1.7, L5.1.8, L5.1.9, L5.1.10, L5.2, L5.3, F7.1, F7.2 – Fritzsche Army Airfield Area

2.8.7.1 Background

These parcels have a combined area of approximately 48 acres (Plate 8). The City of Marina is adjacent to the southeast. With the exception of L5.3, the parcels lie in the northeastern portion of the former Fort Ord, north of Reservation Road and in and around the

former Fritzsche Army Airfield (FAAF). L5.3 lies offsite, about 2 and ½ miles east of the eastern boundary of the East Garrison. The parcels in this group were included in the 1940 land purchase. They include support buildings related to the FAAF, water supply wells, and a former sewage treatment plant.

Historical maps show no structures on the area north of Reservation Road until the late 1960s, when the FAAF airstrip, navigational beacons, and support buildings are evident. Earlier maps show the airfield but no support buildings. In 1946, the area had a practice bazooka and rifle grenade area linked by access road to Reservation Road (then known as New County Road) (*USACE, 1946*). Maps from the 1950s show the area assigned for training by the 41st Signal Battalion (1953) as: (1) a Ranging Area, (2) a Demonstration Area, (3) a Tank Driving Area used by the 759th Tank Battalion (*Army, 1956*), (4) a Basic Driving Area (1957), and (5) a Field Communication, Crewman's Course, and Leased Area (1958). Lack of suitable terrain for tank firing practice, no evidence of tank targets, and no evidence of ordnance use in the area indicate the training in the area was not OE related (*HLA, 2000*).

2.8.7.2 Site Investigation

In 1998, Parcels L5.1.2 through L5.1.10, L5.2, and L5.3 were the subject of a Finding of Suitability to Transfer (FOST) conducted by the Army (*Army, 1998b*). The FOST reviewed the Environmental Baseline Survey (EBS) for the FAAF parcel (January 1995), the final CERFA report (April 1994), EPA Region IX's concurrence with the CERFA report (April 19, 1994), various RI/FS documents, remedial action reports, and subsequent approval memoranda. A site walk was conducted in June 1997. The FOST reported the following information for the parcels as documented in the various sources:

- Parcels L5.1.2, L5.1.4, and L5.1.5 are included in IRP Site 40. The site was the FAAF Defueling Area. L5.1.4 and L5.1.5 are Interim Action (IA) Sites 40C and 40A, respectively. The parcels were subject to IA

investigation activities in June 1996 that included soil excavation, soil sampling, and excavation backfilling. The Site 40 IA Confirmation Report submitted to regulatory agencies in January 1997 was approved by the EPA (January 31, 1997) and DTSC (July 23, 1998). No further remedial action was deemed necessary at the site.

- Parcel L5.1.3 includes a 200-gallon propane tank no longer in use
- Parcel L5.1.6, L5.1.7, L5.1.9, and L5.1.10 are included in IRP Site 34. The parcels are Wash Aprons 534 and Buildings 534 and 538; Wash Apron 525; Wash Apron 512; and Wash Apron 517. The four wash aprons were used for cleaning vehicles on the property. The buildings on these parcels were used by the Army for aviation operations and navigation. Investigations on the property include a 1993 asbestos survey conducted on Buildings 534 and 538 (Parcel L5.1.6).
- Parcel L5.1.8 is IRP Site 36 (FAAF sewage treatment plant and Building 550C). This building has been used to house navigational equipment for Marina Municipal Airport. Building 550C was investigated during the facility-wide asbestos survey in 1993. The building was also the site of a former UST, which was removed in March 1996 and granted Monterey County Department of Health (MCDOH) closure in a letter dated April 6, 1994.
- Parcels L5.2 and L5.3 are former aviation navigational beacons. Parcel L5.2 also contains Building 550B, which was investigated during a facility-wide asbestos survey in 1993. The building was also the site of a former UST, which was removed in April 1992 and granted MCDOH closure in a letter dated January 6, 1996.

The FOST indicated no OE or evidence of OE use in any of the above parcels. The FOST did find evidence of OE use in adjacent Parcel L5.1.1, identified from a 1946 facilities training map as a practice bazooka and rifle grenade area (USACE, 1946).

The remaining parcels, S2.1.3, S2.1.4.1, and S2.1.4.2, have been investigated as follows:

- Parcel S2.1.3 is IRP Site 35, the FAAF Aircraft Cannibalization Yard, which underwent site characterization from 1993 to 1995 (HLA, 1995c). Activities for the investigation included clearing sampling locations for sensitive habitats, conducting a soil gas survey, and drilling three soil borings. No evidence of OE was found during these activities.
- Parcels S2.1.4.1 and S2.1.4.2 are included in IRP Site 34, in an area that encompasses Wash Apron 516 and Building 509. The parcels underwent soil investigations for IA activities conducted between 1995 and 1997 (Uribe & Associates, 1998). No evidence of OE was found during these activities.

One OE site, OE-34, is near the parcels for this group. Site OE-34 is approximately 100 feet northwest of L5.1.8 and 800 feet northeast of L5.1.4. In 1994, a removal action was conducted at Site OE-34. The deepest penetrating item found on Site OE-34 was a 2.36-inch rocket (HLA, 2000). In 1999, the EPA geophysically resurveyed 7 acres of Site OE-34 using an EM61 and 1.5 acres using a G-858 magnetometer. Subsequently in 1999, the Army also resurveyed the entire limits of Site OE-34 using an EM61. No UXO was found during the 1999 surveys. As shown on Plate 8, developed and undeveloped land separates the boundary of Site OE-34 and the Track 0 parcels. Site OE-34 will undergo additional evaluation in the OE RI/FS.

2.8.7.3 Rationale

OE is not likely to be present on the parcels for the following reasons:

- A review of Fort Ord related investigations including the Revised ASR, the Literature Review and the Site 39 Data Summary and Work Plan indicates the parcels were not used for ordnance training

- Developed and undeveloped land separates the boundary of Site OE-34 and the Track 0 parcels
- All parcels lie within an area with no evidence of OE use or history of OE related items identified in incident reports. An adjacent OE site, Site OE-34, has undergone complete OE removal and confirmation
- The Fort Ord CERFA investigation found no evidence of ordnance use on these parcels
- No evidence of OE was found during a site walk performed in support of the real estate transfer of these parcels
- Investigations completed under the Fort Ord Basewide RI/FS program that included excavations and intrusive activities, found no evidence of ordnance use on the parcels.

2.8.8 Parcels E11b.1, E11b.2, E11b.3, E11b.4, L20.14.1.2, L20.19.2, L20.20, L20.21.1, L20.21.2, L20.22, L23.3.1, L23.3.2.1, L35.3, L35.6, L35.7, and L35.8 – East Garrison Area

2.8.8.1 Background

These parcels are within the earliest developed portions of former Fort Ord and include the East Garrison (including buildings and infrastructure), the East Garrison sewage treatment plant, a former skeet range, a small family cemetery and some undeveloped property. The combined parcel area is approximately 226 acres (Plate 9). The property was purchased by the Army in 1917 and was used as an encampment for artillery and cavalry units stationed at the Presidio of Monterey. Construction of permanent facilities began in 1940 and included mess halls and latrines (Parcel L23.3.2.1), a mule corral and sewage treatment facility (Parcels E11b.2 and E11b.3, respectively), a truck and gun parking area

(Parcels L23.3.1 and E11b.1), and storage buildings (Parcels L23.3.1 and L23.3.2.1) (*TSCRRC, 1993*). Little development has occurred on these parcels since this time. The Leadership Reaction Course (LRC) was established in 1960s in the southern portion of Parcel L23.3.2.1.

2.8.8.2 Site Investigation

The LRC was used to test and evaluate leader practices and problem solving (*Army, 1992*). According to a former Range Control Officer, the LRC was an obstacle course and no live firing of any kind was allowed (*Stickler, 1999*). A skeet range was established in the southern half of Parcel L23.3.1 sometime after 1964 and prior to 1968 (*HLA, 1994c*). A heavy vehicle driver training course was built within the northern portion of Parcel L23.3.1 in 1971. An area utilized for the storage of hazardous waste prior to disposal or recycling, was established within in Parcel L23.3.2.1 by the Fort Ord Defense Reutilization and Marketing Office (DRMO) in the early 1970s (*HLA, 1994a*).

The only training involving the use of weapons in the immediate area occurred within nearby small arms ranges located on adjacent parcels. Firing at the small arms ranges was toward the south away from the East Garrison (*Army, 1940b*). The northern boundary of Site OE-5 is located to the south of the East Garrison area. Site OE-5, south of East Garrison, was established as the result of the finding of a scrap 3.5” rocket motor in the branches of an oak tree in the area (*USAEDH, 1997b*). No known range for rocket firing was located in this area. An ordnance removal contractor sampled this site and did not find evidence of ordnance use (*HFAI, 1994*). As shown on Plate 9, undeveloped land separates the northern boundary of Site OE-5 and Track 0 Parcels L20.20, L20.21.1, L20.21.2, L23.3.1, L23.3.2.1, L35.6 and E11b.1. Site OE-5 will undergo additional evaluation in the OE RI/FS.

A USACE UXO Safety Specialist completed a site walk of Parcel E11b.1 and no UXO or OE scrap was found.

Extensive field work including site walks, soil boring investigations, trenching and soil excavations at IRP Sites 29, 30, 32 and 39A have taken place within the developed and undeveloped portions of most of the parcels. These areas were investigated for the presence of chemical contamination under the Basewide RI/FS program. No OE was encountered during any of the IRP investigations.

2.8.8.3 Rationale

OE is not likely to be present on these parcels for the following reasons:

- A review of former Fort Ord ordnance related investigations including the ASR, the Literature Review, the Site 39 Data Summary and Work Plan and the Site OE-5 Sampling and Removal Action Final Report, indicates that the parcels were not used for ordnance training
- OE sampling at nearby Site OE-5 found no evidence of OE
- Site OE-5 is separated by undeveloped land from the Track 0 parcels
- This area was the one of the first to be established and developed as a troop encampment at Fort Ord
- No UXO or OE scrap was found on Parcel E11b.1 during a site walk completed by a USACE UXO Safety Specialist
- No evidence of OE use was found during the Fort Ord CERFA investigation, which included site walks of the developed and undeveloped parcels and a review of Fort Ord related documentation
- Investigations completed under the Fort Ord Basewide RI/FS and UST programs, which included intrusive activities, found no evidence to indicate the use of ordnance on the parcels
- No evidence of OE use was found during several site walks of the parcels.

2.8.9 Parcels E2b.1.1.1, E2b.1.2, E2b.1.1.2, E2b.1.3, E2b.1.4, E2b.1.5, E2b.2.1, E2b.2.2, E2b.2.3, E2b.2.4, E2b.2.5, E2b.3.1.1, E2b.3.2, E2c.2, E2c.3.1, E2c.3.2, E2c.3.3, E2c.4.1.1, E2c.4.2.1, E2d.1, E2d.2, E17, L2.1, L12.2.2, L12.2.3, L12.3, L23.1.1, L23.1.2, L23.1.3, L23.1.4, L23.1.5, L35.1, L35.2, L20.16.1, L20.16.2, L20.16.3, S1.5.1.1, S1.5.1.2, S1.5.2, L23.4, L2.2.1, L5.8.1, L5.8.2, L20.17.1 – Main Garrison Area

2.8.9.1 Background

These parcels are within the former Fort Ord Main Garrison and include the earliest and most heavily developed portions of the former Fort Ord. Most of the property containing these parcels was purchased in 1940, however, these parcels also include land originally purchased by the Army in 1917 (*Little, 1994*). The majority of the development on these parcels occurred in 1940 and 1941 and included the construction of troop barracks, motor pools, horse stables and corrals, support and maintenance facilities, a hospital and recreation areas and the installation of water supply wells (*Army, 1940a*). The combined area includes 44 parcels that encompass approximately 568 acres (Plate 10).

2.8.9.2 Site Investigation

A few locations within these parcels were utilized for weapons training and include a mortar square location and rifle instruction circles. The mortar square was formerly located on Parcel S1.5.1.1 within a motor pool

(Army, circa 1954). As discussed previously, mortar squares were used for the practice of setting up and aiming of weapons or dry fire (HLA, 2000). The former locations of three rifle instruction circles were identified on these parcels. Two of three former locations lie on Parcel S1.5.1.1 in an area that had previously contained as horse corrals (U.S. Engineer Office, 1946). The third rifle instruction circle was located in an open area partially within the boundary of Parcel S1.5.2 (FASI, 1951). All of the Main Garrison Track 0 parcels lie within an area identified on a 1945 Training Facilities map as a “Well Area, No Artillery Firing Or Demolitions” (Army, 1945). In 1993 an inert land mine was found in a storage yard within Parcel L35.1. The device was apparently left at the location and was not related to any training activities in this area (HLA, 1994b).

One potential OE site is adjacent to these parcels. Site OE-2, Pete’s Pond is located adjacent to Parcels S1.5.1.1, S1.5.1.2, and L5.8.1 and a portion of Site OE-2 overlies Parcel L5.8.2 (Plate 10). Site OE-2 was identified as a chemical training area and a landmine warfare training area (USAEDH, 1997b). Site OE-2 was sampled for OE in 1994 and two inert OE scrap items were found (HFAI, 1994). A portion of Site OE-2 overlaps IRP Site 16 (Parcel L5.8.2) and is adjacent to IRP Site 17 (Parcel S1.5.1.2). During the investigation and remediation of IRP Sites 16 and 17, 468 2.36-inch inert practice rockets were removed from burial pits located in former landfill areas within Parcels L5.8.2 and S1.5.1.2 (IT, 2000) (Plate 10). Landfill areas within Parcels S1.5.1.2 and L5.8.2 were fully excavated in 1997. This area is considered a Special Case Track 0 area. Although ordnance was found on Parcels S1.5.1.2 and L5.8.2, the items were buried in disposal pits within these parcels and were not associated with ordnance use in these areas. The land within the OE footprint has been excavated, backfilled and re-graded. Any ordnance that might not have been located through excavation would most likely have been found during the re-grading process. Site OE-2 will undergo additional evaluation in the OE RI/FS.

A USACE UXO Safety Specialist completed a site walk around two groups of barracks on Parcel E2b.3.1.1. The inspection involved walking around the outside of the buildings and looking under the building where openings in the building skirt allowed a view into the crawl space. No UXO or OE scrap was found during the site walk.

Several other investigations related to the potential presence of chemical contamination occurred on these parcels. The investigations were performed under the former Fort Ord Basewide RI/FS program. Investigations occurred at IRP Sites 12, 13, 14, 15, 18, 19, 28, and 38. These investigations included literature reviews, site walks and monitoring well and soil boring installation. Additional intrusive activities (trenching and excavating) occurred at IRP Sites 12, 14, and 15. The investigation at IRP Site 12 (Parcel E2b.2.1) included the excavation and removal of contaminated soil at two locations, including the removal of debris within a large disposal area. No evidence of ordnance was found during the excavation of the two areas associated with IRP Site 12 (IT, 1999b). The investigation at IRP Site 14 (Motor Pool) included the excavation of contaminated soil associated with grease racks located on Parcels L5.8.1, S1.5.1.1 and S1.5.2. Four small excavations were completed and no evidence of ordnance was found (HLA, 1996a). The investigation at IRP Site 15 (Directorate of Engineering and Housing Yard) included the excavation of contaminated soil adjacent to Building 4913 located on Parcel L20.17.1 (HLA, 1996d).

Site walks of these parcels have occurred in support of proposed real estate transfers of these parcels. No evidence of ordnance use was observed during these site walks (HLA, 1997e).

2.8.9.3 Rationale

OE is not likely to be present on these parcels for the following reasons:

- A review of former Fort Ord ordnance related investigations including the ASR, the Literature Review, the Site 39 Data

Summary and Work Plan, indicates that the parcel was not used for ordnance training

- Construction/development began on most of the parcels immediately after purchase of the property by the Army
- OE sampling at adjacent Site OE-2 only identified two OE scrap items
- A USACE UXO Safety Specialist completed a site walk around two groups of barracks on Parcel E2b.3.1.1. No UXO or OE scrap was found during the site walk
- The results of the Fort Ord CERFA investigation which included a site walk on the developed portions of the parcels and a review of Fort Ord related documentation including documents pertaining to ordnance use, found nothing to indicate ordnance use
- Investigations completed under the former Fort Ord Basewide RI/FS program that included trenching and excavations, found no evidence to indicate the use of ordnance on the parcel
- The landfill areas within Parcels S1.5.1.2, L5.8.2 and L20.17.1 that were found to contain buried inert rockets were fully excavated. Additionally, the remaining non-landfill areas of Parcels L5.8.2 and L20.17.1 that lie within the Site OE-2 boundary were completely re-graded
- No evidence of ordnance use was found during several site walks of these parcels.

2.8.10 Parcels E2e.1, E2e.2, E8a.1.2, E8a.1.3, E8a.1.4, E8a.1.5, S1.3.3, S2.5.1.1, S2.5.1.2, and Portions of Parcels S2.5.2.1 and S2.5.2.2 – OU 2 Landfill Area

2.8.10.1 Background

These parcels lie in the north central portion of the former Fort Ord and include undeveloped land adjacent to, but excluding, areas overlying the former Fort Ord landfill, a portion of Inter-Garrison Road, the 8th Avenue Cut-Off, 6th Street between the 8th Avenue Cut-Off and Imjin Road and their associated right of ways (ROWs). The parcels in this group were included in the 1940 land purchase. The parcels include several roads used to access the landfill. The combined parcel area is approximately 156 acres (Plate 11).

2.8.10.2 Site Investigation

Portions of these parcels were used for various non-ordnance training activities from 1940 until approximately 1987. Non OE training activities occurring on the parcels included a camouflage area, obstacle course and Field Communication Course. No training areas are shown on these parcels on former Fort Ord training facilities maps dated after 1987. Construction of a landfill began adjacent to Parcels E8a.1.2, E8a.1.3, E8a.1.4, and E8a.1.5 in 1960 and remained active into the late 1980s (*HLA, 1990*). Housing was constructed (Fredricks Park and Schoonover Park) on adjacent property beginning in 1981. Housing and recreation areas were developed to the north of the parcels in the late 1970s (*Little, 1994*).

Two potential and one known or suspected ordnance sites are located adjacent to the parcels. Sites OE-2, OE-13A, and OE-31. Site OE-2, Pete's Pond, was identified as a chemical training area (*USAEDH, 1997b*). Site OE-2 was sampled for OE in 1994 and two OE scrap items were found (*HFAI, 1994*). Four hundred sixty-eight 2.36-inch inert practice rockets have been removed from disposal pits located in former landfill areas within Parcels S1.5.1.2 and L5.8.2. Results of the ASR indicate that Site OE-2 was not an impact area. Site OE-2 will undergo additional evaluation in the OE RI/FS.

Site OE-13A was identified in the ASR as a practice mortar range and it is believed that

practice mortars, inert training devices, were used here (*USAEDH, 1997b*). No evidence of mortar firing was found during OE sampling activities at Site OE-13A (*HFAI, 1994*). The practice mortar range is shown on Fort Ord Training and Facilities maps dating from 1954 to 1958. On the basis of the location of the bleachers located at Site OE-13A, firing of practice mortars at this site would have been toward the northeast roughly parallel to Imjin Road (Plate 11). Site OE-13A will undergo additional evaluation in the OE RI/FS.

Site OE-31, CSU Footprint, was identified by the BRAC office as a disposal parcel. The site boundary is based upon transfer parcel delineation and not on evidence of OE. Several OE sites lie within the Site OE-31 boundary including Sites OE-4C, OE-7, OE-8 and OE-18. Three and four foot OE removal have been conducted throughout the site. Although several burial pit caches of ordnance were found and removed, the ordnance actually fired at the OE site was apparently limited to rifle grenades. The type of training activities that occurred at nearby Sites OE-4C, OE-7, OE-8 and OE-18 would not have impacted the Landfill parcels (*USAEDH, 1997b*). UXO items found during the OE removal actions at Sites OE-4C, OE-7, OE-8, and OE-18 included smoke grenades, fuzes, pyrotechnics (e.g., flares), and practice mines (*HFAI, 1994*). Site OE-31 will undergo additional evaluation in the OE RI/FS.

Site walks of Parcels S2.5.1.1 and S2.5.2.1 were completed by a USACE UXO Safety Specialist and no UXO or OE scrap was found.

2.8.10.3 Rationale

OE is not likely to be present on these parcels for the following reasons:

- A review of former Fort Ord ordnance related investigations including the ASR, the Literature Review and the Site 39 Data Summary and Work Plan, indicates that the parcels were not used for ordnance training
- OE removal action was conducted at adjacent Site OE-31

- OE sampling was conducted at Sites OE-2 and OE-13A and only OE scrap was found
- No OE was identified in Parcel S2.5.1.1 during remediation activities conducted at Sites 16/17 and OU2
- Land adjacent to the Parcels was used as a sanitary landfill beginning in 1960. Housing was constructed immediately to the north of the parcels in the late 1970s and to the immediate east in 1981. There were no reports of OE being found during construction
- No UXO or OE scrap was found on Parcels S2.5.1.1 and S2.5.2.1 during a site walk completed by a USACE UXO Safety Specialist
- Inter-Garrison Road (Parcels E2e.2 and S1.3.3) has been in its present location since at least 1943.

2.8.11 Parcels L5.10, L20.10.1.1, L20.10.1.2, L20.10.2, and L20.10.3 – Reservation Road Area

2.8.11.1 Background

These five parcels are rectilinear areas that extend along and include Reservation Road in the northeastern portion of the former Fort Ord. The road lies southwest of and runs roughly parallel to the Salinas River from Highway 1 through the former Fort Ord to the East Garrison area. Parcel L5.10 is the farthest west of the four parcels along the road, followed by L20.10.1.1, L20.10.1.2, L20.10.2, and L20.10.3 in respective order moving southeast (Plate 12). Portions of the road between the parcels are excluded from consideration in this ROD because they are not on the former Fort Ord property. This parcel group area totals approximately 55 acres.

Historical maps of the area dating from as early as 1913 show sections of the road as part of an unnamed, unimproved track. Maps dating from

the 1940s and 1950s show the road as New County Road or County Road (*USACE, 1946; Army, 1956*). Later the road was improved, widened, and renamed Reservation Road (*USACE, 1976*).

Parcel L5.10 and a portion of Parcel L20.10.1.1 lie within lands acquired by the Army in 1940. The remainder of Parcel L20.10.1.1, as well as Parcels L20.10.1.2, L20.10.2, and L20.10.3 lie within lands acquired by the Army in 1917. The parcels border Parcels E5, E11.b.2, F7.2, L23.3.2.1, and S2.1.4.1, also included in this ROD based on their non-OE histories. Areas that do not border the aforementioned parcels, with the exception of L20.10.3, lie in an area with no evidence of OE use or history of UXO items identified in incident reports (*HLA, 2000*). Parcel L20.10.3 borders a non-OE area as well, except for adjacent Site OE-33 (OE Cache), that has undergone complete OE removal (*HLA, 2000*).

2.8.11.2 Investigation Summary

In 1998, the parcels were the subject of a FOST conducted by the Army (*Army, 1998b*). The FOST reviewed the final CERFA report (April 1994), EPA Region IX's concurrence to the CERFA report (April 19, 1994), various RI/FS documents, remedial action reports, and subsequent Approval Memoranda. No evidence of OE was reported during the FOST investigation, which included a site walk conducted on January 27, 1997 (*Army, 1998b*). Field personnel trained in ordnance recognition performed the site walk. No evidence of OE was found during the site walk.

Site OE-33 lies adjacent to Track 0 Parcel L20.10.3. Site OE-33 (OE Cache) was identified by the Fort Ord Federal Police (*UXB, 1995*). The Federal Police located a foxhole containing small arms ammunition a live practice 40mm cartridge and five live 40mm smoke cartridges. A 4-foot removal was performed and additional small arms and 40mm cartridges were removed. Site OE-33 will undergo additional evaluation in the OE RI/FS.

2.8.11.3 Rationale

OE is not likely to be present on these parcels for the following reasons:

- A review of the former Fort Ord ordnance related investigations including the ASR, the Literature Review, the Site 39 Data Summary and Work Plan, and the UXB Removal Action Report for Site OE-33 indicates the parcels were not used for ordnance training
- All parcels except one lie within and adjacent to areas with no evidence of OE use or history of UXO items identified in incident reports. The exception is L20.10.3, which borders Site OE-33, the OE Cache, a site that has undergone complete OE removal
- According to historical records, the roadways and shoulders have been used since at least 1913 for vehicular traffic
- The Fort Ord CERFA investigation found no evidence of ordnance use on these parcels
- No evidence of ordnance was found during a site walk performed in support of the proposed real estate transfer of this parcel.

2.9 Documentation of Significant Changes

The Track 0 Proposed Plan was released for public comment in February 2000. The Proposed Plan identified 118 parcels or portions of parcels as meeting Track 0 status at the time. The Army reviewed all written and verbal comments submitted during the public comment period. It was determined that no significant changes to the remedy (No Action), as originally identified in the Proposed Plan, were necessary or appropriate.

However, based on transfer parcel boundary changes and on additional information discovered since the publication of the Proposed Plan, changes were made to the status of several Track 0 parcels. Parcels S2.1.2, L5.6.1, L5.6.2, and portions of Parcels S2.5.2.1 and S2.5.2.2

have been identified as requiring further evaluation and have been dropped from the No Action determination at this time. Track 0 Parcels L20.10.1, L32.4.1 and E2c3.3 have since been subdivided for the purpose of property transfer. The subdivision of Parcels L20.10.1, L32.4.1, and E2c3.3 created additional Track 0 parcels (L20.10.1.1, L20.10.1.2, L32.4.1.1, L32.4.1.2, and E17).

A portion of former Parcel E4.3.1 was removed from Track 0 consideration because a UXO item was found within an excavation on the parcel. The location of the buried item was adjacent to the Area A landfill. On this basis Parcel E4.3.1 was subdivided into two parcels (E4.3.1.1 and E4.3.1.2). Parcel E4.3.1.1 will remain Track 0 and Parcel E4.3.1.2 is removed from Track 0 consideration at this time.

Additionally, a buffer was placed around the perimeter of the OU 2 landfill cells (approximately 100 feet) to reduce the potential for landfill gas migration to adjoining property. The addition of the buffer resulted in the subdivision of Parcel E8a.1. New Track 0 parcels created from the subdivision of the Track 0 portion of former Parcel E8a.1 include E8a.1.2, E8a.1.3, E8a.1.4, and E8a.1.5 (Plate 6).

And lastly, Parcels E2b.3.2, L20.20, L20.21.1, L20.21.2, L20.22, L20.14.1.2, and L20.19.2 have been added to the Track 0 ROD. Parcel E2b.3.2 is within the Main Garrison Area and is entirely surrounded by Track 0 Parcels. Parcels L20.20, L20.21.1, L20.21.2, L20.22, L20.14.1.2, and L20.19.2 include the roads within the East Garrison. These parcels were left out of the Proposed Plan due to an oversight, however, the parcels meet the Track 0 criteria as defined in the Proposed Plan and this ROD.

Since the Proposed Plan was issued, information concerning several OE incidents associated with some Track 0 areas has been found. These incidents were isolated occurrences, were not indicative of past OE-related use within Track 0 areas and did not present a risk to the public.

Information regarding these OE incidents were submitted to the U.S. EPA and the DTSC under cover letters dated August 8 and November 27, 2001 and June 3, 2002 (*Army, 2001a, 2001b, and 2002*).

2.10 Summary of Site Risks

Track 0 areas at former Fort Ord are those that contain no evidence of OE and have never been suspected as having been used for OE-related activities of any kind. These areas consist largely of land that has been developed for military support or residential use throughout Fort Ord's history, and areas that have no physical or documented evidence of OE-related training. This determination is supported by a Literature Review which consisted of gathering and reviewing information from multiple sources. Historical records reviewed included range control files, historical maps, aerial photographs, historical film footage, real estate records, and newspaper articles. Interviews were conducted with retired military personnel, active Corps of Engineers employees, personnel present as active servicemen at Fort Ord from the 1930s through base closure in 1994, and OE contractors. Other factors considered included physical location of the area, development history, and the results of the remedial investigation and excavation activities at sites with contaminated soil or groundwater.

Special Case areas are also considered for No Action in this ROD, such as areas where OE-related items were found within waste disposed in a landfill, but no OE-related activities occurred at the area, and the waste has been entirely removed.

Track 0 areas pose no known current or potential risk to human health or the environment from previous OE-related activities. The locations and descriptions of the areas proposed for No Action are shown on Plate 2 and are listed on Table 1.

3.0 RESPONSIVENESS SUMMARY

3.1 Overview

At the time of the public review period for the Army's Superfund Proposed Plan: No Action Is Proposed For Selected Areas at Fort Ord, California, dated February 1, 2000, the Army identified no action as the selected alternative for non-OE areas at the former Fort Ord.

Summary of Public Comments

On the basis of the written and verbal comments received, the Army's Proposed Plan was generally accepted by the public. However, several citizens expressed concerns regarding the following issues:

- Property at the former Fort Ord that currently contain housing should be transferred and reused without further delay to provide housing for the local homeless community or conversely, should not be transferred until the OE RI/FS process is completed.
- The no action areas should be evaluated as part of the OE RI/FS and under National Environmental Policy Act (NEPA) and California Environmental Quality Act (CEQA). The areas were reviewed and no action was determined to be necessary based on reviews of documentation, interviews and records searches that some members of the public feel are inconclusive or inadequate.
- There is a need to clarify how continued public education regarding the potential presence of OE, land use controls or notifications would be implemented for Track 0 areas.
- Numerous issues not directly related to the Track 0 Proposed Plan were brought up such as the role of the Restoration Advisory Board (RAB) in the Proposed Plan process; the inclusion of small arms as OE; how property transfer is conducted, etc.

3.2 Background on Community Involvement

In 1991, Fort Ord was added to the BRAC List. The economic impact of Fort Ord's closure has created much community interest relative to the potential economic reuse of portions of the former Fort Ord. Specifically, the Track 0 areas are under consideration for reuse for residential, commercial, and business development by the Fort Ord Reuse Authority (FORA).

Focused community involvement regarding the Proposed Plan has most recently involved the public review of the Army's Proposed Plan for the Track 0 areas. A 30-day public comment period began February 4, 2000 and was extended to 60 days at the request of the public, closing on April 4, 2000.

This responsiveness summary responds to written comments received during the public comment period as well as oral comments expressed during the public meeting conducted on February 16, 2000.

3.3 Summary of Comments Received During the Public Comment Period and Department of the Army Responses

Comments raised during the Track 0 Proposed Plan public comment period are categorized by four topics as summarized below: A) Document Review Issues, B) Regulatory Issues, C) Technical Issues, and D) Property Transfer and Other Issues, and are summarized in Section 3.4.

A. Document Review Issues

Several comments on the Proposed Plan document review process and its relation to

other parallel documents were made as summarized below. In general, the public requested more time to review the Proposed Plan, which was granted during a 30-day extension. In addition, comments regarding information in other documents related to the Proposed Plan were made that would not affect the outcome of the review process.

A1. A 90-day extension to the public comment period for the Superfund "No-action" Proposed Plan was requested by several members of the public. Some members of the public also requested that comments made during the Question and Answer session of the February 16, 2000 public meeting be included by reference as comments on the Proposed Plan and the transcript become part of the Administrative Record. In addition, it was requested that meetings be held in other portions of Monterey County, notice of property transfer be longer than 30 days, members of the public have sufficient information to approve the Proposed Plan, the web site be more accessible, and other ways of participating besides meetings and going to the library be provided. A member of the public observed that community members do not have adequate scientific background to understand the subject nor have sufficient information to approve the Track 0 Proposed Plan. This individual suggested that a third party, unconnected and not funded by the Army, conduct an independent study to validate the Track 0 investigation.

Response: A 30-day public comment period began February 4, 2000 and was extended to 60 days at the request of the public, closing on April 4, 2000. Public meetings are held on a monthly basis at the former Fort Ord in Monterey County. Comments made during the Proposed Plan public meeting are addressed within this responsiveness summary. Regarding the public meeting, it is clear from a review of the transcripts and the agenda that the meeting facilitator reminded the meeting participants numerous times that only comments made during the "public comment period" portion of the meeting will be considered. Information regarding the Track 0 Proposed Plan and the former Fort Ord cleanup in general is available

on the Fort Ord web site (www.fortordcleanup.com) and is distributed at the monthly meetings. Consistent with EPA guidance (*A Guide to Preparing Superfund Proposed Plans, Records of Decision, and Other Remedy Selection Decision Documents*, EPA 540-R-98-031, July 1999) and the National contingency Plan (NCP), public participation on the Track 0 Proposed Plan was accomplished by: (1) publishing a notice in a major local newspaper, (2) providing copies to the public, (3) providing a reasonable opportunity for public comment, (4) conducting a public meeting, (5) maintaining a transcript of the entire public meeting in the Administrative Record, and (6) providing a written summary of significant comments, criticisms and new relevant information. Revisions to the web site have been made to improve accessibility.

Recognizing the importance of community involvement and the need for citizens to be informed, Congress included provisions in Superfund Amendments and Reauthorization Act of 1986 to establish the Technical Assistance Grant (TAG) program. Administered by the U.S. Environmental Protection Agency, the TAG provides funding for a local community organization to hire independent technical advisors to help community members understand and comment on site-related information. Ms. Christine Shirley of Arc Ecology, as contracted through the U.S. EPA's TAG program, commented extensively on the Proposed Plan and other supporting documents.

A2. The Track 0 Technical Memorandum is still undergoing regulatory and public review and is not final. In general, it is invalid or unacceptable because the Army has not conducted an RI/FS and it relies on supporting documents that are incomplete. Comments are not due on the Draft Final Technical Memorandum until February 21, 2000. This important reference document must be finalized before it can be determined whether the proposed action is acceptable.

Response: The *Track 0 Technical Memorandum* was issued on January 21, 2000

and addressed agency comments on the November 1999 draft. Since there were no additional comments, the January 21, 2000 document became final on February 21, 2000. In addition, the public comment period for the Proposed Plan was extended to allow for review and consideration of this document. The Track 0 document process follows EPA guidance for preparing a No Action decision document (*A Guide to Preparing Superfund Proposed Plans, Records of Decision, and Other Remedy Selection Decision Documents, EPA 540-R-98-031, July 1999*), and is conducted in parallel to the OE RI/FS for the entire former Fort Ord. This Proposed Plan is based on review of numerous sources of information as described in the Literature Review and Technical Memorandum.

A3. The Army should not rely on the CERFA Report because the EPA did not entirely concur with it and it provides misleading rationales.

Response: The CERFA Report was only one of many sources of information used in identifying Track 0 areas.

A4. Evidence that the Restoration Advisory Board has evaluated the proposed action, as required by the Ordnance and Explosives Community Relations Plan (1998) or the Federal Facilities Agreement should be provided.

Response: The *Community Relations Plan, Ordnance and Explosives Program, Fort Ord, California* (March 1998) was superseded by the *Community Relations Plan Update Number 1, (May 2000)*, and the *Community Relations Plan Update Number 2 (November 2001)*. The Restoration Advisory Board (RAB) public meeting process was replaced by regularly scheduled community involvement workshops and quarterly Technical Review Committee (TRC) meetings in 1999. Neither the original *Community Relations Plan, Ordnance and Explosives Program (March 1998)*, the *Community Relations Plan Update Number 1 (May 2000)*, the *Community Relations Plan Update Number 2 (November 2001)*, nor the

Federal Facilities Agreement contain a requirement for a RAB evaluation of the Proposed Plan. The Army has met all public involvement requirements stated in the NCP (40CFR 300.430) and specifically EPA guidance (*A Guide to Preparing Superfund Proposed Plans, Records of Decision, and Other Remedy Selection Decision Documents, EPA 540-R-98-031, July 1999, Section 2.2.2*), which includes: (1) publishing a notice in a major local newspaper, (2) making a copy available in the Administrative Record, (3) providing a reasonable opportunity for public comment, (4) providing the opportunity for a public meeting, (5) maintaining a transcript of the public meeting, and (6) providing a written summary of significant comments, criticisms and new relevant information.

A5. The Army's Draft Ordnance and Explosives Remedial Investigation/Feasibility Study program is inconsistent. In the *Draft Literature Review Report* there is a paucity of contacts or interviews, missing records, lack of documentation, inadequate sampling, inadequate site walks, etc. It proves that more interviews, investigation, testing, and action is absolutely necessary for the protection of human health and the environment.

Response: A similar comment was addressed in "Summary Of Public Comments And Responses On The Draft Literature Review Report," included as Appendix E to the *Draft Final Literature Review Report*, dated January 4, 2000. The Army did attempt to locate others who might have information on training at the former Fort Ord through publishing advertisements in both USA Today and the Army Times as part of the Final Engineering Evaluation/Cost Analysis – Phase 1, Former Fort Ord, Monterey California dated September 1997. The advertisements provided a toll free number. A total of 26 telephone responses were received. In addition, a request for information on ordnance use and training at the former Fort Ord was submitted to the Fort Ord Alumni Association. To date, no response has been received. Previous interviews for the Basewide RI/FS were also reviewed for any information related to ordnance use or training.

B. Regulatory Issues

Several comments were received from the public regarding the regulatory requirements under which the Proposed Plan was prepared. In general, the comments were not applicable to the No Action document requirements as summarized below.

B1. The Proposed Plan is incomplete. It is requested that the Army provide alternatives to the proposed remedy in support of the proposed action during the public comment period. The Army is required to perform an analysis of alternatives as part of the Remedial Investigation/Feasibility Study process.

Response: In accordance with the EPA Guidance Document, *A Guide to Preparing Superfund Proposed Plans, Records of Decision, and Other Remedy Selection Decision Documents (EPA 540-R-98-031)* Section 8, the Description of Alternatives and Comparative Analysis of Alternatives are not required when documenting a No Action decision where unacceptable risks will not occur.

B2. Several citizens expressed concern that the Army had not addressed NEPA and CEQA for the Track 0 areas, and one citizen commented that the Army is using its response authority to conduct response actions.

Response: Since the CERCLA/NCP process provides for public involvement in a manner that is functionally equivalent to NEPA requirements, compliance will be achieved by following the NCP procedures. CERCLA specifically seeks to avoid unnecessary duplication of effort. The CERCLA/NCP process addresses, where appropriate, consideration of environmental effects and compliance with applicable legal standards, and the public will be afforded the same opportunity to review and comment that is provided by NEPA. CEQA does not apply to federal decisions. The Army has followed appropriate procedures in evaluating the Track 0 areas and conducting response actions in conjunction with the regulatory agencies.

B3. The Army has repeatedly failed to comply with the laws that are set in place by the U.S. Government and the State of California to protect human health and the environment. Several citizens also expressed concern that the regulatory agencies (i.e., the State and EPA) need to take a more active role in the OE cleanup process at the former Fort Ord.

Response: The environmental cleanup at the former Fort Ord is being conducted in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended by the Superfund Amendment and Reauthorization Act (SARA), established by the United States Government. The cleanup is done with active regulatory oversight by the EPA, DTSC, and California Regional Water Quality Control Board (RWQCB).

C. Technical Issues

Several members of the public commented on various technical components of what is required to be included in a No Action document as summarized below.

C1. A summary of an OE baseline risk assessment for these sites is required by CERCLA Section 300.430(4). In addition, a preliminary remediation goal for OE should be established similar to the one used in the No Action evaluation for the chemical RI/FS sites.

Response: The Site Risk section of the Record of Decision provides information to support the determination that no remedial action is necessary. The lead agency in the Proposed Plan and ROD explains the basis for the conclusion that unacceptable exposures to OE will not occur. The Proposed Plan states that "Track 0 areas pose no known current or potential threat to human health and the environment from previous OE-related activities." An evaluation of each area proposed for No Action is provided in the ROD as well as the Track 0 Technical Memorandum issued January 21, 2000. The risk associated with the

potential presence of OE at the former Fort Ord and a preliminary remediation goal cannot be established in the same way as it can be for chemical residue, and is not necessary for Track 0 areas since they pose no known current or potential threat to human health or the environment from previous OE-related activities. A risk approach is under development for the Fort Ord OE RI/FS.

C2. An evaluation of the proposed action according to the "nine criteria" presented in 40 CFR Chapter 1 (7-1-99 Edition), Section 300.430 (e)(9)(iii) is required. In addition, definition of the term "community acceptance," one of the nine criteria, was requested.

Response: An evaluation according to the "nine criteria" is part of the Comparative Analysis of Alternatives Section of a decision document. This section is not required for the No Action decision document as described in the EPA guidance document (*A Guide to Preparing Superfund Proposed Plans, Records of Decision, and Other Remedy Selection Decision Documents, EPA 540-R-98-031, July 1999*). Available public input and reactions to the information presented within the Proposed Plan therefore gauge community acceptance of the Proposed Plan.

C3. An analysis of ARARs (applicable or relevant and appropriate requirements) for the proposed action is required.

Response: Applicable or Relevant and Appropriate Requirements (ARARs) analysis is part of the Statutory Determinations section of decision documents. This section is not required for a No Action decision document as described in the EPA guidance document (*A Guide to Preparing Superfund Proposed Plans, Records of Decision, and Other Remedy Selection Decision Documents, EPA 540-R-98-031, July 1999*).

C4. The Army has failed to interview enough people who served, worked, or lived, or witnessed what happened at Fort Ord. The Army only contacted or interviewed

23 people (of which only 7 were referenced in the Draft OE RI/FS Literature Review Report). Those 23 people were not at Fort Ord from the beginning to the end. They could not have witnessed every incident, accident, authorized burial, unauthorized burial, and dumping that was apparently common on the Superfund Site known as the former Fort Ord.

Response: Interviews and newspapers are not the sole basis for investigating historic uses of the former Fort Ord, but only two of the avenues used in the Literature Review. See Section 6.0 of the *Draft Final Literature Review Report* for the complete list of the references such as the National Archives and Records Administration, the Military History Institute, Presidio of Monterey historian's office, the Monterey County Historical Society, and local newspaper articles. Furthermore, this comment was addressed in the Army "Summary Of Public Comments And Responses On The Draft Literature Review Report," included as Appendix E to the *Draft Final Literature Review Report*, dated January 4, 2000.

C5. The Army and Harding Lawson Associates admit that records have been lost or destroyed. The archive search report is incomplete. Police records were not searched because it "would take too long."

Response: The Army has made a conscientious attempt to search all applicable archives. Based on the review of the Military Police records to date, no significant additional information would be obtained from further review of these records.

C6. The current ordnance removal contractor, USA Environmental, Inc., does not fill out incident reports in response to ordnance finds that they determine are OE scrap. In addition, if practice mines and real ones look the same and practice mines are overlooked during sampling, the Army cannot determine how many more there may be. All OE, OEW, UXO, and OE scrap must be fully documented. If OE scrap is found that proves OE was used in the area.

Response: The comment regarding incident reports was addressed in the Army “Summary Of Public Comments And Responses On The Draft Literature Review Report”, included as Appendix E to the *Draft Final Literature Review Report*, dated January 4, 2000. All ordnance finds, whether scrap or live, when reported, are documented. Practice mines are logged during sampling of OE areas. All available OE-related information was reviewed for areas proposed for No Action. This information is provided in *Track 0 Technical Memorandum, Ordnance and Explosives Remedial Investigation/Feasibility Study, Former Fort Ord, California dated January 21, 2000*. The Army considers OE scrap in its evaluation of the presence of unexploded ordnance in any given area.

C7. The Army fails to adequately address the potential for OE to be present in the Monterey Bay. A September 1999 letter from the Monterey Bay National Marine Sanctuary should be responded to. In addition, shells have impacted other areas outside the Fort Ord boundary, which is the responsibility of the Army to address.

Response: The potential presence of OE in the Monterey Bay was addressed by geophysical and sediment sampling as described in the *Southern Monterey Bay Continental Shelf Investigations: Former Fort Ord Restricted Zone - US Geological Survey Open File Report 97-450*. This report is included as an Appendix to the *Final Enhanced Preliminary Assessment of Monterey Bay, Fort Ord California dated January 12, 1999*. The purpose of the investigation was to conduct a comprehensive investigation of the seafloor in the Fort Ord Restricted Zone to identify any suspected features that may be caused by debris related to Army activity. The report concluded that no features were identified that were related to Army or other human activity although many interesting biological features were seen. The Monterey Bay National Marine Sanctuary and other agencies were involved with the planning of this investigation. The Army responded to the September 1999 letter from the Monterey Bay National Marine Sanctuary regarding dissolution of the RAB and coastal

environmental activities at the former Fort Ord with a letter dated December 10, 1999. The Army currently has no evidence that past OE-related activities have occurred outside the former Fort Ord boundary. Should such evidence be discovered, the Army will take appropriate action at that time.

C8. The Army offers the rationale for including parcels in Track 0, but does not adequately discuss what criteria were used to select (or screen) parcels, including the Plug-in Process, which is not described in sufficient detail. The Approval Memorandum process is also not clear. It is requested that the Army systematically evaluate each parcel using a check list provided in the Approval Memorandum and apply a buffer zone of at least 500 feet around the parcels because they lie adjacent to areas of known contamination. In addition, OE sampling of 10% of an area is unacceptable and site walks were not conducted on all Track 0 areas.

Response: Each parcel was systematically evaluated and the Plug-in Process was described as being based on the criteria provided in the Technical Memorandum as summarized in the Proposed Plan. Based on the available information for each Track 0 area, the evaluation indicated no OE-related uses took place. Buffer zones, OE sampling, and additional site walks would not be justified for areas that meet the following criteria: (1) no evidence of OE exists at the area, and (2) the area has never been suspected as having been used for OE-related activities of any kind. While each Track 0 area was systematically evaluated in a manner similar to the checklist suggested in public comments, the Army developed a similar checklist which summarizes the key elements of Track 0 supporting data and which is now included in this ROD as Appendix A.

C9. Definitions related to ordnance and explosives provided in the glossary of the Proposed Plan are misleading, the potential for buried OE to be present in some Track 0 areas is unacceptable. Small arms should be included in the Track 0 analysis.

Response: The definitions are provided to clarify various terms related to OE that are typically used in literature and common practice. There is no evidence of the potential presence of buried OE at any of the Track 0 areas. The potential presence of buried OE at the former Fort Ord will be addressed in the OE RI/FS. Information collected to date from extensive excavation and grading has not identified any evidence of burials in Track 0 areas. Furthermore, there is no evidence to suggest any of the Track 0 parcels were used as small arms ranges.

C10. How will new information be incorporated into the Track 0 process? If OE is found at any Track 0 parcel during redevelopment, then the Army needs to reconsider all Track 0 designations.

Response: The property transfer documents would specify that if the property recipient should discover any ordnance on the property, the Directorate of Law Enforcement at the Presidio of Monterey must be notified and that competent U.S. Army Explosives Ordnance Disposal personnel will be promptly dispatched to dispose of such ordnance properly at no expense to the property recipient. Whenever new information concerning OE-related activities becomes available, the information will be presented to the regulatory agencies and the Army will take an appropriate action.

D. Property Transfer and Other Issues

Several comments were made by members of the public regarding property transfer and other issues not specifically related to the Proposed Plan as summarized below.

D1. The early or "dirty" transfer is not necessary and must not happen. In addition, which areas are being proposed for transfer, how large are they, and what boundaries have shifted? "Job and revenue loss" is a big myth and the Army fails to adequately describe the environmental condition of the property in these documents. *The Track 0 Technical Memorandum, Ordnance and Explosives*

Remedial Investigation/Feasibility Study, Former Fort Ord, California provides a description of the areas proposed for No Action concerning OE and does not address issues related to transfer of property.

Response: Reuse is set by the FORA Reuse Plan. This Proposed Plan is environmental documentation regarding OE that examines if the property is in a condition that is protective of human health and the environment based on the intended reuse. Locations, sizes and boundaries of the Track 0 areas are provided in the Proposed Plan, supporting Technical Memorandum, and reiterated in this ROD.

D2. The housing area properties should be transferred as soon as possible to provide housing for the local homeless community. In general, those citizens and organizations that are interested in reusing property at the former Fort Ord for the homeless felt the environmental review and cleanup of the properties were done in a responsible and reasonable manner.

Response: Comment acknowledged. Reuse is set by the FORA Reuse Plan. The Proposed Plan and ROD are environmental documentation regarding OE that examines if the property is in a condition that is protective of human health and the environment based on the intended reuse.

D3. The Army fails to assess and evaluate these properties and others for (a) hazardous substances and contamination, (b) environmental impacts anticipated from intended use, (c) ordnance and explosives, and (d) the adequacy of use restrictions and notifications. Past and present health concerns need to be addressed, such as transfer of property containing lead paint and small arms.

Response: The Proposed Plan is intended only to address specific areas at former Fort Ord where no evidence of OE exists. Former Fort Ord was evaluated for the potential presence of chemical contamination under the *Basewide Remedial Investigation /Feasibility*

Study, Fort Ord, California. Environmental impacts anticipated from the intended reuse were evaluated in the *Environmental Impact Statement, Fort Ord Disposal and Reuse.*

D4. The future uses of these properties (and others at the former Fort Ord) presents a current and future risk to human health and the environment.

Response: Track 0 areas pose no known current or potential threat to human health or the environment from previous OE-related activities.

D5. The Restoration Advisory Board (RAB) must be reestablished. In addition, the credibility of the Army is a concern. The community must be informed in order to oversee the “cleanup” process. The Army would rather not have the public and community involved, even though it is, and will be, the public and surrounding communities who are and will be suffering if proper cleanup is not implemented. The RAB has found the Army has prepared biased minutes of meetings.

Response: The Comment regarding the RAB is not applicable to this document. The public involvement opportunities required by the NCP and CERCLA have been completed as stated in the community participation section of the ROD.

D6. The citizens of Marina would know very little were it not for EPA’s Technical Assistance Grant recipient, the Fort Ord Toxics Project.

Response: The comment is not applicable to the Proposed Plan.

D7. The surrounding cities and the Fort Ord Reuse Authority (FORA) must not risk the health and safety of humans and the environment with this early or dirty transfer. The Army is known for dumping toxic and dangerous substances and materials. Why is Marina & FORA also willing to harm their citizens and the environment?

Response: Reuse is set by the FORA Reuse Plan. This Proposed Plan is environmental

documentation that examines if the property is in a condition that is protective of human health and the environment for the intended reuse. The comment is not applicable to the Proposed Plan.

D8. The Army fails to adequately describe the environmental condition of the property and to interview adequate numbers of people who served at Fort Ord. The property transfer process should cease because there are few records to adequately characterize the area. In addition, the Army admits to missing or destroying records and a lack of documentation. The Governor, EPA and DTSC must not defer the covenants that are required by law to protect human health, safety, and the environment. “Facts do not cease to exist because they are ignored.”

Response: The Proposed Plan is intended only to address specific areas at the former Fort Ord where no evidence of OE exists. Interviews are not the sole basis for investigating historic uses of the former Fort Ord, but only one source of information used in the Literature Review. The former Fort Ord was evaluated for the potential presence of chemical contamination under the *Basewide Remedial Investigation /Feasibility Study, Fort Ord, California.* Environmental impacts anticipated from the intended reuse were evaluated in the *Environmental Impact Statement, Fort Ord Disposal and Reuse.*

D9. The Army fails to adequately describe the use of chemical weapons materials at Fort Ord and to address small arms as OE. Does the Army have a program for investigating and remediating chemical warfare material at Fort Ord? Is Fort Ord participating in the Army’s non-stockpile chemical material program? If not, why not? If so, has the Army notified the program that CAIS kit and evidence of mustard gas have been recovered at Fort Ord?

Response: The Comment is not applicable to the Proposed Plan. Furthermore, there is no known use of chemical materiel and no evidence of small arms ranges within the Track 0 areas. In addition, soil contamination from small arms use at other parts of the former Fort Ord was

addressed under the Basewide ROD signed in January 1997.

The Non-Stockpile Chemical Warfare Materiel Program oversees the handling and disposal of all types of non-stockpile chemical materiel within Department of Defense. The Non-Stockpile Chemical Warfare Materiel Program conducted a national survey regarding chemical warfare materiel use, which included the former Fort Ord. The survey found no evidence to indicate the use of chemical weapons at the former Fort Ord. The installation did, however, receive chemical warfare materiel training items in the form of “chemical agent identification set” (CAIS) prior to 1974. There has been only one instance of CAIS discovery at former Fort Ord, during an OE removal action at Site OE-13B in 1997. This discovery was properly handled in accordance with protocols established by Non-Stockpile Chemical Warfare Materiel Program. Although it is unlikely, should additional CAIS be discovered at the former Fort Ord, the removal and remediation will follow the Non-Stockpile Chemical Warfare Materiel Program protocol.

On August 27, 1993, environmental cleanup contractors using a backhoe to dig a trench at IRP Site 16 (known as Pete’s Pond) within the Main Garrison area, uncovered a drum. A UXO specialist operating the backhoe stopped digging because the shape of the drum was similar to drums designed to store mustard agent, although no markings were observed. The Army chemical team assessed the area of the unearthed drum. Soil samples were collected and analyzed for mustard agent and its degradation products. The sampling results did not identify any mustard agent or mustard agent degradation product. No evidence of mustard gas has ever been found at the former Fort Ord.

D10. The Army should better define the continued public education process, notification and site controls for the Track 0 areas as well as non-Track 0 areas. In addition, how will the Army compensate if someone is harmed by OE after the cleanup is complete?

Response: The public education and community involvement process for the former Fort Ord, including the Track 0 areas, are described in the *Community Relations Plan Update #1*. Fences and signs have been placed around the Multi-Range Area (MRA) to limit access to certain parts of the former Fort Ord, and such security measures will be maintained until the OE sites are in a condition that is safe for unrestricted access. Long term risk management measures will be developed as part of the OE RI/FS to address the possibility of someone being harmed by OE after the cleanup is complete at OE sites.

D11. The Army should describe their Memorandum of Agreement (MOA) regarding property transfer of these areas and provide information on the 5,200 acres proposed for transfer.

Response: The MOA addresses property that will be transferred between the Army and FORA and is not directly applicable to the Track 0 Proposed Plan.

3.4 Summary of Comments

On the basis of the written and verbal comments received, the Army’s Proposed Plan was generally accepted by the public. However, several citizens expressed concerns regarding:

1. The need for an extension of the review period for the Proposed Plan, which was extended by 30 days.
2. Areas that currently contain housing should be transferred and reused without further delay to provide housing for the local homeless community or, conversely, should not be transferred until the OE RI/FS process is completed. Reuse is set by the FORA Reuse Plan.
3. Technical and regulatory aspects of what should be included in the Proposed Plan, which are addressed by the No Action process.
4. The need for clarification of how continued public education regarding the potential

presence of OE, land use controls or notifications would be implemented for Track 0 areas, which is addressed in the Community Relations Plan.

5. Numerous issues such as the role or the RAB in the Proposed Plan process; the inclusion of small arms as OE; how property transfer is conducted, etc., which are not relevant to or directly related to the Track 0 Proposed Plan.

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