

Response to QUESTION/COMMENT CARDS from Symposium #1

1. Question: Is the decision solely up to the ARMY? I see there are lots of agencies involved, but it appears the ARMY always does what it wants to.

Answer: No. Vegetation clearance alternatives are being evaluated in an Interim Action Remedial Investigation / Feasibility Study (IA RI/FS). Following completion of the IA RI/FS process the Army will prepare a Record of Decision (ROD) that will select the method of vegetation clearance. The U.S. Environmental Protection Agency and California Department of Toxic Substances Control must sign the ROD.

2. Question: Of the audience participants of 58-60 people, I am personally aware of over 25 who are staff of panelists and 10 who are either media or League of Women's Voter's - Where is the public who are so concerned? There are also 3 of us who are elected officials who I know to be satisfied with the Army's / Environmental Agencies past performance. This does not appear to be cost effective or productive.

Answer: Noted. See response to question three, below.

3. Question: What fraction of the participants are government employees, contractors, or part of FORA? What fraction of the audience are from the general public?

Answer: Of the attendees who signed in at the Symposium #1, or who did not sign in but were recognized by the community relations staff, 20% can be identified as Army, Federal, State, regional, or local government representatives/employees, contractors associated with the Fort Ord cleanup, or FORA members/staff.

The general public, defined as other than those described above and those associated with Monterey Bay area educational institutions, non-profit organizations, media, and representatives of organizations receiving or seeking contacts/funds or grants involving the environmental cleanup of the former Fort Ord, constituted 12% of those who signed in or were recognized by the community relations staff as attendees of the symposium.

4. Question: Were any of the law firms, legal and/or environmental organizations involved in the burn/no burn issue invited to speak today?

Answer: No. Speakers from some of these groups may participate in Symposium 2. Additionally, the Army will hold subsequent public meetings where these groups will be provided the opportunity to participate.

5. Question: Where are the representatives from the other side of the lawsuit? How can we have this discussion without both sides participating?

Answer: The purpose of Symposium 1 was to provide information regarding the unexploded ordnance problem, vegetation clearance challenges, habitat management requirements and future reuse plans. Symposium 2 will address results of the vegetation clearance analysis and provide objective discussion of health concerns related to smoke from burning at Fort Ord. The view of all sides will be presented.

6. Question: Why don't you have any panelists who oppose the burning? Plenty of experts are available.

Answer: See answer to number 4 and 5 above.

7. Question: Why don't you have any public interest people who have studied the burnings involved in presenting?

Answer: See answer to number 4 and 5 above.

CLEARANCE:

8. Question: Doesn't mechanical clearing lead to more invasive weeds?

Answer: To date, our vegetation monitoring results indicate that both cut and burned areas result in the occurrence of invasive plants when there is a seed source present or located near the disturbed area. We have seen an increase in the spread of invasive plants when a site is impacted several times over a short time frame and we are working on minimizing the intervals between impacts.

We have been using mechanical methods primarily within designated development areas where vegetation monitoring is not required. Therefore our monitoring information is based on only a few of habitat sites where vegetation was cleared using manual and mechanical methods. Additional vegetation monitoring is being conducted to provide more information for the OE RI/FS and will address the associated impacts from invasive plants following Ordnance and Explosives cleanup.

9. Question: Which areas can be mechanically cleared and which areas are put on hold until burning or other agreement is in place?

Answer: Mechanical vegetation clearance methods have been the primary method within areas designated to be developed and where surface unexploded ordnance are not likely to occur. The majority of these areas have already been cleared and the remaining areas that can be cut should be completed within the next two years. However, approximately 10,000 acres of vegetation located within habitat reserve

areas remain to be cleared over the next 10 to 15 years in support of the OE cleanup project. Vegetation clearance of these habitat reserve areas is temporarily on hold until completion of the IA and OE RI/FS. Although the HMP requires these maritime chaparral habitat areas be cleared of vegetation using prescribed fire, the vegetation clearance method(s) to be used on these sites will be decided in the IA and OE RI/FS Records of Decision.

10. Question: Once the land is transferred to BLM, what will be the protocol for remaining ordnance removal if it is discovered?

Answer: BLM will notify the Army and Army personnel will remove the UXO.

11. Question: What safety precautions are there for fire fighters during prescribed burns that set off small arms fire and other UXO?

Answer: The Army's Ordnance and Explosives safety experts will work closely with the firefighters to ensure their safety. Most fires will be ignited and controlled using helicopters.

12. Question: I am glad that you all have put the ranges for Seaside on the potential road to action - however, since these areas are so threatening why did you wait last to clean up the UXO? I understand about the endangered species, but couldn't alternatives have made sense then instead of now?

Answer: The Army prioritizes its cleanup to remove unexploded ordnance from the sites that pose the greatest risk to the community. Early efforts were focused on removing UXO from unfenced areas that are located outside the fenced Multiple Range Area. The Seaside ranges are within the fenced MRA but are high on the Army's priority for cleanup because of the ranges are close to the city of Seaside. The Army plans to begin removing UXO from these areas in the near future.

13. Question: Is Summer 2002 a definite date for action or will there be more symposiums to discuss more action? I am referring to UXO clean up.

Answer: The Army is currently removing UXO from high risk sites in areas with little or no vegetation. The Army also plans to cut the vegetation at Seaside parcels in the nearby future. No prescribed burns will occur before the Interim Action Remedial Investigation / Feasibility Study (IA RI/FS) is completed. Prescribed burning is one of the vegetation clearance alternatives being evaluated in the IA RI/FS. If prescribed burning is selected in the Record of Decision, a burn could occur as early as Fall 2002. There will be another Symposium on November 14, 2001 and more public meetings in the spring of 2002.

14. Question: If fire is used, what are the smoke mitigations?

Answer: In addition to the typical preparation of a smoke management plan and development of a burn prescription which is favorable for smoke dispersion, the Army would temporarily relocate anyone in Monterey County who desires to be relocated at the standard government lodging and food rates.

15. Question: Does EPA consider the UXO burning as a "release" as defined by Superfund regulations as 3 times background concentration?

Answer: The 3 times background concentration referenced is an informal guideline and not EPA policy or regulation, and is not used as part of the definition of a Superfund release. Note: This question was referred to the U.S. Environmental Protection Agency for a response.

16. Question: What are some of the positive or negative consequences of long term/short term burning?

Answer: Burning is the safest method of vegetation clearance within OE sites for both the vegetation clearance workers and OE workers. Burning overgrown areas reduces the possibility of future wildfires. Burning chaparral habitat also provides short and long-term benefits to plants and animals that have evolved with fire as an important part of its life cycle. Use of fire to clear the vegetation is also the most efficient taking only a few days versus much longer using other manual or mechanical methods.

There should be no negative consequences if the burn prescription works correctly. If it does not, the negative consequences would involve the odor and presence of smoke for a short duration.

17. Question: I am sure that the most dangerous UXO are still present on Seaside property. The workers have not removed ordnance from the 8,000 acres that is being debated today. Why?

Answer: See answer to number 12. Also, the Habitat Management Plan restricts vegetation clearance to about 800 acres per year. Removing UXO from the MRA will take 10 to 15 years.

18. Question: What will determine the maximum size of the parcel that will be approved for burning at any given time?

Answer: The Habitat Management Plan (HMP), existing firebreaks, type of unexploded ordnance that is present, and proximity to development and people. The HMP limits prescribed burning in habitat areas to no more than 800 acres per year. Therefore, under most ideal circumstances, the largest burn at Fort Ord would be less than 800 acres. Burns would occur less than 5 days per year.

19. Question: What about Munitions Landfills mentioned in the ARMY'S ECA? How can it be safe to burn vegetation over this vast amount of hazardous and toxic material?

Answer: The Army's Phase 2 Engineering Evaluation/Cost Analysis (EE/CA) does not mention anything about "Munitions Landfills" nor does the former Fort Ord have any areas designated as "munitions landfills". A technical memorandum conducted in consultation with the U.S. Environmental Protection Agency Region IX and California Environmental Protection Agency, Department of Toxic Substances Control addresses air emissions from incidental ordnance detonation during a prescribed burn on ranges 43 through 48. The preliminary results of this study indicate that air pollutant emissions from incidental OE detonation during a prescribed burn at Ranges 43-48 will be minor compared to emissions contributed directly by vegetation burning, and will result in pollutant concentrations well below health-protective regulatory screening values.

STUDIES:

20. Question: If an RI/FS and an EIS are functionally equivalent and the public wants an EIS why don't you give them one?

Answer: Army regulation 200-2 states that when a Remedial Investigation / Feasibility Study RI/FS is performed; a NEPA analysis is not required.

21. Question: How many RI/FS's are there currently ongoing basewide?

Answer: There was Basewide RI/FS, completed in 1995, to address various chemical contamination sites at the former Fort Ord. Cleanup of these chemical contamination sites is mostly complete.

The Army is currently conducting an Interim Action RI/FS to address ordnance and explosives at three high-risk sites in or adjacent to the Multi-Range Area. The Interim Action RI/FS will study and recommend an appropriate action to reduce the explosive risks at the three sites as much as possible, as soon as possible. The draft Interim Action RI/FS report is expected to be issued and be available for public review late October 2001. There will be a Proposed Plan to formally solicit comments from the public on the proposed interim actions, in March 2002. Record of Decision will follow the public comment period for the Proposed Plan.

The Army is also conducting basewide Ordnance and Explosives RI/FS. For each OE sites (or group of sites), OE RI/FS will study and recommend an appropriate action to make sure that the land is safe for reuse in the long-run. All previously-conducted cleanups and investigations will be re-evaluated for completeness. There are four decision tracks under the basewide OE RI/FS, so there will be four sets of Proposed Plans and Records of Decision. The last ROD, called Track 3 ROD, is expected to be complete in 2005.

22. Question: When will the DTSC do an EIR on the burning and cleanup? Why or why not?

Answer: DTSC does not intend to do an Environmental Impact Report (EIR) on the burning or the cleanup. The California Environmental Quality Act (CEQA) is not triggered for DTSC because others are performing and approving the project. The Army, in this case, is performing the cleanup, and the Army may be implementing a prescribe burn. USEPA is the lead regulatory and agency, and it is USEPA who will be approving these projects. Note: This question has been referred to the California Department of Toxic Substances Control for the response.

23. Question: When will the ARMY and U.S. Fish and Wildlife re-visit the HMP? Why or why not?

Answer: The HMP was developed to reduce and minimize impacts to several special status plant and animal species during the cleanup and reuse of former Fort Ord. Currently there is no reason to "re-visit" the HMP because the most beneficial method of vegetation clearance to the maritime chaparral - burning - has not been eliminated and the HMP is being fully implemented. However, if the Army is prevented in the future from fully implementing the HMP, which includes conducting prescribed burns, it is the Army's responsibility to reinitiate consultation with the Service in accordance with Section 7 of the Endangered Species Act.

24. Question: How much mercury (Hg) is in the soils of the Central Coast? Trace amounts _____? What happens to the mercury during these fires? How much is released or transformed in the environment?

Answer: The Fort Ord Basewide Remedial Investigation/Feasibility Study (BW RI/FS) of 1995 included an investigation of background concentrations of metals including mercury. Of 123 samples collected, analysis of only two detected mercury. The maximum concentration detected was 0.12 parts per million. For reference, USEPA established a preliminary remediation goal of 20 parts per million mercury in soil. This concentration would be considered safe for people under a residential scenario. An additional investigation into concentrations of mercury that occur in soils of the multi-range area (known as Site 39 in the BW RI/FS) showed

results comparable to the background concentrations. No Fort Ord-specific data has been collected to identify concentrations of mercury in air during fires, but the Technical Memorandum titled Air Emissions from incidental ordnance detonation during a prescribed burn on Ranges 43 through 48 also includes mercury as one of the metals assessed. The study estimates uptake of mercury, among other metals, into plant material and uses this information to estimate metal emissions from burning vegetation. The estimated concentration of mercury in air was well below the screening level identified in the report.

25. Question: If air emission studies show UXO present during burns do not contribute toxic emissions that exceed safe levels then can safe burning proceed?

Answer: Yes. Data shows that the smoke produced from burns at Fort Ord are similar in composition to smoke produced from other prescribed burns and wildfires. Accordingly, the Army has developed a State of the Art burn prescription and mitigation measures that will minimize smoke impacts to the community.

HABITAT:

26. Question: How will the 15 species that are rare and unique adapt to having their habitat burned in a prescribed burn? How will you be able to save the Tiger Salamanders in a burn?

Answer: Chaparral species, including the rare and protected plant species, are adapted to fire. Several of the rare shrub species germinate only after a fire. Although many of the mature plants are killed by fire, many of the plants only reproduce when the seeds are stimulated by the heat, ash and chemical reactions within the soil following a fire. Herbaceous species such as the federally endangered sand gilia and threatened Monterey spineflower as well as several fire following plant species are most abundant in the years immediately after fires. If fire is prevented from occurring in maritime chaparral, species diversity will decline and a conversion from healthy highly diverse chaparral to a more common habitat is likely to occur.

The California tiger salamander is a rare species primarily due to habitat loss from development and agriculture. The tiger salamander requires both wetlands and uplands to fulfill its life cycle requirements. The tiger salamander uses vernal pools for two to four months of the year for reproduction and then searches out cool damp areas such as animal burrows during the dry summer months. Since prescribed burns would occur during the time when salamanders are in their subterranean hideouts, impacts to the salamanders would be expected to be minimal considering the salamander has evolved within a habitat where fire is expected.

27. Question: How can the habitat be a "fire prone" one if Fort Ord has one of the lowest occurrences of natural fires due to lightening in the country? (An incidence average of 1 in 500 years)

Answer: Central maritime chaparral located on former Fort Ord has evolved over thousands of years relying on fire to set back succession and rejuvenate the habitat. Since the Army acquired the former Fort Ord lands in 1917 and 1940 fire has been a consistent theme due to military training activities and intentional management using prescribed fire. These fires resulted in creating a very healthy, diverse plant community that contains some of the best chaparral habitat remaining on the central coast of California. Continuation of this fire regime will promote the conservation of the maritime chaparral plant community that contains several threatened and endangered plants as well as many rare species that depend on fire for their reproduction.

28. Question: For the land to be transferred to the BLM, is there a plan or an agreement by the ARMY and BLM for the threat of invasive plant pollution?

Answer: Control of invasive plants by federal agencies is required by Presidential Executive Order 13112, February 3, 1999, Invasive Species. The Army, BLM and State Parks have been implementing an aggressive campaign against the spread of invasive plants on former Fort Ord lands. Control of invasive plants such as African iceplant, Pampas grass and French broom has primarily occurred within remediation areas, along fuel breaks and access roads throughout the unimproved areas of former Fort Ord. This effort is expanding and control of these noxious weeds is the ultimate goal provided the necessary funding remains is available.

LAND TRANSFERS:

29. Question: Why can't all previously developed areas be transferred separate from naturally vegetated lands to speed up the process?

Answer: That is what is happening, but the land must be safe for the intended reuse before it can be transferred. Some developed land has already been transferred. Additional parcels are due to be transferred soon.

30. Question: It seems a slow-down is developing concerns;

1. Priorities for low/middle income workers of local employment,
2. Questions regarding appropriate assignment of contractors for building at Fort Ord by Monterey County Planning Department

What does this slow down do to the plans of the ARMY?

Answer: The cleanup, reuse and redevelopment of Fort Ord is a complex process requiring the cooperation and/or concurrence of many agencies. Every effort is being made by all parties to move forward as quickly as possible, while complying with applicable requirements and ensuring the property is in a safe condition when it is redeveloped. For additional, specific information, please call the Fort Ord Reuse Authority (FORA) at (831) 338-3672.

NEW JOBS:

31. Question: We have proven that community members can be trained to remove UXO. To do any job well, one must be trained. This will help to put people who are severely economically impacted to work. Where are the funds?

Answer: No members of the local community have received training to remove OE. The OE removal workers are all UXO experts that received their training while serving in the Armed Services. There are no plans to train local community members to remove unexploded ordnance.

GENERAL COMMENTS:

Comment: The ARMY is the pollutant, the ARMY needs to clean it up, and funds need to be made available for everything we need. Stop the suffering here in our communities. Why is it so hard to do the right thing?

Comment: People are endangered species. When are we going to be protected?

Comment: Honest answers please...The much needed tax base cannot come at the expense of community members. The community of color and low-income people are being pushed out for more affluent people who are getting good paying jobs, housing and businesses. We are tired of being intimidated and lied to.