

## APPENDIX D

### Responsiveness Summary

**RESPONSE TO COMMENTS ON  
TRACK 1 PLUG-IN APPROVAL MEMORANDUM  
COUNTY NORTH MUNITIONS RESPONSE AREA  
FORMER FORT ORD, CALIFORNIA**

The 30-day comment period for the Track 1 Plug-In Approval Memorandum, County North Munitions Response Area (MRA) opened on August 28, 2009 and ended on September 28, 2009. The Army received a total of 51 written comment letters. Forty-eight of the letters supported the Track 1 Plug-In Approval Memorandum and decision process for the County North MRA. Two comment letters were submitted by the Fort Ord Community Advisory Group (FOCAG) concerning the Track 1 Plug-In process, the adequacy of previous removal actions, and the potential for munitions constituents to remain in soil. One comment letter was received from the Environmental Protection Agency requesting clarifications be made to the document. These comment letters have been entered into the Administrative Record.

**Comments from Judy Huang of the United States Environmental Protection Agency, Region 9, received September 28, 2009**

**General Comment 1:** The “Fort Ord Reuse Authority (FORA) Environmental Services Cooperative Agreement (ESCA) Track 1 Plug-In Approval Memorandum, County North Munitions Response Area, Former Fort Ord, California,” dated August 26, 2009 (hereinafter referred to as the Track 1 CNMRA Approval Memo), notes that one M6 electric blasting cap was discovered inside the boundaries of the County North Munitions Response area (MRA). The discovery of a single M6 electric blasting cap may likely be considered an anomalous event that is not indicative of the presence of a range where demolition of explosives was conducted as a routine practice. It does, however, raise a question as to what activities resulted in the blasting cap’s presence in the MRA. Since this item contains high explosives (HE), albeit in relatively small quantities, it is normally used to initiate larger quantities of demolition materials or certain types of mines (i.e., M18 antipersonnel mines). While this discovery is very likely the result of an unidentified activity that may not have been repeated or did not often occur in the MRA, it does indicate that a HE loaded munitions item was found in the area.

Please revise the appropriate sections of the Track 1 CNMRA Approval Memo to reflect the discovery of this HE item and to provide an explanation of why it was present in the MRA and why this does not result in the site being disqualified from classification as a Track 1 Site.

**General Response 1:** The blasting cap found in the County North Munitions Response Area (MRA) is considered an anomalous event for this site and not reflective of normal use of the area and therefore the area is consistent with a Track 1 designation. No evidence was found during the Track 1 evaluation to indicate the presence of a demolition range or other use of these materials within the MRA. The blasting cap was likely carried into the area for the purpose of training or demonstration and inadvertently discarded. Sections 4.4.1 and 6.1.4 of the “Track 1 Plug-In Approval Memorandum, County North Munitions Response Area, Former Fort Ord, California” (“the Track 1 Plug-In Approval Memorandum”) have been revised to clarify that the presence of the single blasting cap is an anomalous event and not an indication of extensive use of the materials in the County North MRA.

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**Specific Comment 1: Section 4.4.10, Mine, Antitank, Practice, M10, Page 24:** The discussion of the design, arming, and functioning of the subject mine provided in this section states that, “The M10 practice mine can be booby trapped with a regular firing device threaded directly into the secondary fuze well. Functioning of the fuze ignites a smoke charge that emits a cloud of smoke and creates a noise. When booby trapped, the mine is activated by a pull wire.” In the summary of this section, however, there is no mention of the likelihood of a boobytrapped mine being functioned by the pull wire. This omission is also repeated in the Mine, Antitank, Practice, M10 subsection of Section 6.1.4, Data Conclusions. Please revise the cited sections to reflect the likelihood of the mine being functioned by the pull wire when booby-trapped.

**Specific Response 1:** The summary of Section 4.4.10 has been revised as follows:

“It is highly unlikely that a person would be able to trigger a practice antitank mine through casual (inadvertent or unintentional) contact *or by pulling the pull wire* if one were found at the site and be exposed to smoke and noise, because the mine: (1) would have to contain a live practice fuze and active practice detonator, (2) was designed to be triggered by the weight of a vehicle *when not booby-trapped*, and (3) these components, *including the pull wire*, would have been exposed to moisture, *degradation, and weathering for many years, which could decrease their effectiveness* (Army 2006b).”

Similar updates have also been made to Section 6.1.4.

**Specific Comment 2: Appendix A Munitions Response Activity Evaluation Checklists, Part 4: Removal Evaluation, Page 4 of 8:** Question Number 13 asks, “Do items found in the area indicate training would have included use of training items with other energetic components?” The “Sources Reviewed and Comments” subparagraph reads, “The electric blasting cap found along the border of CSUMB in the UXB removal action area is the only evidence of use of energetic components.” This statement appears to be in error, as Table 1, County North MRA – Summary of MEC Finds, notes that UXB recovered 12 items in the MRA (including the cited blasting cap). Some of the listed items identified as unexploded ordnance (UXO) apparently contain energetic components (i.e., propellant, low or high explosives). Please review the cited portions of the Track 1 CNMRA Approval Memo and correct them as necessary.

**Specific Response 2:** To clarify that the other items recovered in the MRA containing energetic components referenced in the comment were discussed in previous sections of the Munitions Response Activity Evaluation Checklist, the discussion in the response to Question Number 13 has been revised as follows:

“The electric blasting cap found along the border of CSUMB in the UXB removal action is the only *additional* evidence of use of energetic compounds.”

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**Specific Comment 3: Appendix B, County North MRA Site Walk Investigation Results Memorandum, Pages 2 and 3:** The slang term “grenade spoon” is used on these pages to identify hand grenade safety levers. While this usage is acceptable in historical documents and in references thereto, it should not be used in documents produced recently. Please correct this usage.

**Specific Response 3:** References to the term “grenade spoon” have been revised in the appropriate sections.

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**Forty-eight letters from community members supporting the Track 1 Plug-In Approval Memorandum**

**Comment:** Members of the public submitted 48 letters supporting the Track 1 Plug-In Approval Memorandum and decision process for the County North MRA. Several local community members cited their personal experiences using the subject property for a variety of recreational uses over many years, prior to the transfer of the property from the Army to the Fort Ord Reuse Authority (FORA). They noted jogging, hiking, walking with dogs, bike riding, and horseback riding along the trails located within the property without any incident involving military munitions. They felt the property was safe for these recreational uses.

**Response:** The cited recreational uses are consistent with the currently anticipated future uses for the majority of the County North MRA. As part of the basewide effort to promote explosives safety, the Army provides information to the public to raise awareness of the potential presence of military munitions in and around the former Fort Ord, and to instruct the public to report suspected munitions items if they are encountered. Since 1998, there have been no MEC incidents within the County North MRA property.

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**Summary of Fort Ort Community Advisory Group (Lance Houston) Comments dated September 28, 2009**

**Comment 1:** One comment indicated that a baseline risk assessment has not been performed for the County North Parcel as required by CERCLA.

**Response 1:** The Record of Decision, No Further Action Related to Munitions and Explosives of Concern - Track 1 Sites (Track 1 ROD, Administrative Record No. OE-0526) requires no further action related to munitions and explosives of concern (MEC) for munitions response sites (MRSs) that do not pose an unacceptable risk to human health or the environment from previous military munitions-related activities, based on the results of a site-specific evaluation. Because the risk of unacceptable exposures to MEC is not present, a risk assessment is not necessary to be performed for Track 1 sites. The County North MRA has been identified as a Track 1, Category 3 site and is being proposed as a Track 1 Plug-In site using the process described in the Track 1 ROD. It should be noted that the Fort Ord Ordnance and Explosives Risk Assessment Protocol (Protocol) was developed for the Fort Ord Munitions Response Remedial Investigation/Feasibility Study (MR RI/FS) program through a combined effort of the Army, the U.S. Environmental Protection Agency (EPA), and Department of Toxic Substances Control (DTSC), and extensive public involvement opportunities. The Protocol is a qualitative risk assessment approach based on several input factors including the density of MEC items occurring at a site and the type of hazard associated with the MEC items known to be present at a site. Because the Track 1 sites are not impacted by MEC, or MEC items that may be present are not designed to cause injury, the Protocol or other risk assessment methodology is not applicable to Track 1 sites. Additional information is provided in Section 3, Responsiveness Summary of the Track 1 ROD.

**Comment 2:** One comment states that sampling conclusively shows the parcel is highly contaminated with a variety of munitions and munitions waste and that large amounts of munitions remain on site.

**Response 2:** This Track 1 Plug-In Approval Memorandum includes a site-specific evaluation of archival and field-based investigation data for the County North MRA. As described in Section 3.2 of the Approval Memorandum, multiple investigations were conducted in the County North MRA. The types of military munitions found during these investigations are consistent with the use of the area for general training maneuvers and a bivouac area, and are not designed to cause injury. Twenty MEC items of these types have been recovered from the site. The results of the evaluation for the County North MRA indicated a strong weight of evidence to support that the training at the County North MRA involved the use of practice and/or pyrotechnic items that are not designed to cause injury and the site meets the definition of a Track 1, Category 3 site. The Approval Memorandum presents the rationale and basis for the conclusion that unacceptable exposures to MEC does not occur at the County North.

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**Comment 3:** One comment indicates that the entire site has not been cleared of munitions and munitions waste prior to transfer and references two attachments included with the comment letter including Site Stats/Grid Stats data and a summary that less than 2% of the County North MRA has been cleared of munitions and a letter from Ila Mettee McCutcheon, Colonel, U.S. Army, Chief, BRAC Environmental indicating that “The Presidio of Monterey does not intend to transfer land by deed any known or suspected ordnance site on former Fort Ord land, prior to the completion of all required OE related actions.”.

**Response 3:** During the site stats/grid stats (SS/GS) investigation, MRS-45 was divided into six sectors and sample grids were spread out within each sector. During the 2001 time-critical removal action, accessible areas of the entire County North MRA (except parcel L5.7) were investigated. These and other investigation activities that were conducted in the County North MRA are described in Section 3.2 of the Track 1 Plug-In Approval Memorandum. Even though the area was not entirely walked, sampled, or covered by a removal action, the combination of these investigations has resulted in the majority of the County North MRA being covered by investigation activities. The data generated from the investigation activities are useful in identifying the types of training that occurred in the area. The types of military munitions found on MRS-45 and adjacent areas are consistent with the use of the area for general training maneuvers and a bivouac area.

The cited Army letter states that “The Presidio of Monterey does not intend to transfer land by deed any known or suspected ordnance site on former Fort Ord land, prior to the completion of all required OE *related actions*.” OE-related actions could include conducting an evaluation of MEC risks at a site, as was presented in this Track 1 Plug-In Approval Memorandum. The Army completes all required MEC-related actions necessary to support a land transfer, and documents the conditions of the property being transferred in a Finding of Suitability to Transfer (FOST) or Finding of Suitability for Early Transfer (FOSET) according to the applicable laws and regulations. In the case of the County North MRA, the property has been transferred from the Army to FORA based on the Final FOSET, Former Fort Ord, Environmental Services Cooperative Agreement (ESCA) Parcels and Non-ESCA Parcels (Operable Unit Carbon Tetrachloride Plume) (FOSET5; Administrative Record No. FOSET-004J).

**Comment 4:** One comment states that the detection equipment used during the sampling and removal activities (i.e., the Schonstedt) is incapable of detecting the munitions potentially found onsite.

**Response 4:** FOCAG included a list of penetrating items and the maximum expected penetrating depths. The evaluation of archival and field-based investigation data for the County North MRA indicated a strong weight of evidence to support that the training at the County North MRA involved only the use of practice and/or pyrotechnic items. These types of items would be expected at or near the soil surface and to mostly contain ferrous metal. The geophysical instruments used during sampling and investigation activities on the County North MRA (i.e., Schonstedts) are capable of detecting these types of munitions items (see the

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Ordnance Detection and Discrimination Study [Administrative Record No. OE-0310F] and the Track 1 Plug-In Approval Memorandum for Multiple Sites, Group 2 [Administrative Record No. OE-0591H]). The items that would be more difficult to detect using the Schonstedt include grenade fuzes (containing little ferrous metal) and inert non-metallic practice mines that may be present. If these items remain at the site, they are considered to pose an acceptable risk if encountered.

**Comment 5:** Once comment indicates that the Fort Ord RP may not have used the best detection equipment available for locating munitions commonly found throughout Fort Ord and that penetrating ordnance and deeply buried munitions likely have not been detected and removed.

**Response 5:** The evaluation for the County North MRA indicated a strong weight of evidence to support that the training at the County North MRA involved the use of practice and/or pyrotechnic items. These types of items would be expected at or near the soil surface and to mostly contain ferrous metal. The geophysical instruments used during sampling and investigation activities on the County North MRA (i.e., Schonstedts) are capable of detecting these types of munitions items (see the Ordnance Detection and Discrimination Study [Administrative Record No. OE-0310F] and the Track 1 Plug-In Approval Memorandum for Multiple Sites, Group 2 [Administrative Record No. OE-0591H]). In addition, as stated in the Track 1 ROD, Schonstedt magnetometers have been most commonly used in the UXO remediation industry for many years and are the appropriate instrument for the types of investigations that were conducted at the County North MRA.

**Comment 6:** One comment indicates that because the Army kept poor records during the 77 years of training activities, the former range uses are unknown.

**Response 6:** The determination of former uses of the County North MRA is based on the results of a comprehensive site evaluation presented in the Track 1 Plug-In Approval Memorandum, which included literature searches, review of archival information, review of aerial photographs, the results of Army sampling and investigation activities conducted in the past 25 years, and a recent site walk conducted by FORA with the DTSC and EPA. The types of military munitions found during field investigations at the County North MRA are consistent with the documented use of the area for general training maneuvers and a bivouac area.

**Comment 7:** One comment notes the health hazards associated with constituents in practice and pyrotechnic munitions and claims the Regulators have turned a blind eye to the non-explosive constituents found in these types of munitions used in training areas and questions the justification for not looking for the constituents contained in practice and pyrotechnic munitions.

**Response 7:** The issue of practice and pyrotechnic munitions constituents is not the subject of the Track 1 Plug-In Approval Memorandum. As stated in the FOSET5 (Administrative Record



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No. FOSET-004J), no further action related to munitions constituents in soil are recommended for the parcels within the County North MRA. Potential human health and ecological risks related to soil contamination from military munitions uses are addressed in the following reports:

- The “Final Comprehensive Basewide Range Assessment Report, Former Fort Ord, California, Revision 1,” dated June 2009. (Administrative Record No. BW-2300J)
- The “Final Feasibility Study Addendum, Site 39, Former Fort Ord, California,” dated March 28, 2008. (Administrative Record No. BW-2423F)
- The “Final Basewide Remedial Investigation/Feasibility Study (RI/FS), Fort Ord, California (binders 1 through 18),” dated October 1, 1995 provides information related to the RI/FS for Fort Ord and consists of 6 volumes. Volume I presents an overview and background on Fort Ord and summarizes the results of the Basewide RI/FS. Volume II presents the Remedial Investigations. Volume III presents the Baseline Human Health Risk Assessment. Volume IV presents the Baseline Ecological Risk Assessment. Volume V presents the Feasibility Study and Volume VI presents the response to agency comments received on the draft final version of the RI/FS. The information provided (as it related to Site 39) includes munitions constituents investigation and feasibility study information. (Administrative Record Nos. BW-1283A through BW-1283S; available at link: [http://www.fortordcleanup.com/docreview/reportsviewdoc.asp?document=BW\\_RIFS\\_list](http://www.fortordcleanup.com/docreview/reportsviewdoc.asp?document=BW_RIFS_list))

**Comment 8:** One comment requests a document be forwarded (if it exists) that addresses the practice and pyrotechnic constituents and the potential health hazards from exposure to them.

**Response 8:** The issue of practice and pyrotechnic munitions constituents is not the subject of the Track 1 Plug-In Approval Memorandum. Please see the response to Comment 7 above for a listing of reports that address the potential human health and ecological risks related to soil contamination from small arms and military munitions uses. As stated in the FOSET5 (Administrative Record No. FOSET-004J), no further action related to munitions constituents in soil are recommended for the parcels within the County North MRA.

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**Summary of FOCAG (Mike Weaver) Comments dated September 27, 2009**

**Comment 1:** One comment related to the use of SS/GS at the site and that this has resulted in only some random “grids” selected to be parts of the investigation and that only parts of these random grids have been investigated.

**Response 1:** During the SS/GS investigation, MRS-45 was divided into six sectors and sample grids were spread out within each sector. During the 2001 time-critical removal action, accessible areas of the entire County North MRA (except parcel L5.7) were investigated. These and other investigation activities that were conducted in the County North MRA are described in Section 3.2 of the Track 1 Plug-In Approval Memorandum. Even though the area was not entirely walked, sampled, or covered by a removal action, the combination of these investigations has resulted in the majority of the County North MRA being covered by investigation activities. The data generated from SS/GS sampling as well as the other investigation activities are useful in identifying the types of training that occurred in the area. The types of military munitions found during the SS/GS sampling, as well as the other types of investigations conducted on MRS-45 and adjacent areas, are consistent with the use of the area for general training maneuvers and a bivouac area.

**Comment 2:** One comment was regarding the sampling involving random hikes down “bunny trails” and that if the person walking the trail didn’t spot anything then the area is assumed to be clear.

**Response 2:** Many of the trails that have been walked are not created by wildlife, as FOCAG suggests, but are trails that have been visible on aerial photographs within the MRA since the 1940s and have been used by soldiers as part of training exercises. The investigations that have been conducted at the MRA have included the use of Schonstedt geophysical instruments that are capable of detecting ferrous munitions items that may be present below the ground surface. Section 3.2 of the Track 1 Plug-In Approval Memorandum describes the numerous investigation activities that have occurred in the County North MRA. The data generated from the investigation activities are useful in identifying the types of training that occurred in the area. The types of military munitions found on MRS-45 and adjacent areas are consistent with the use of the area for general training maneuvers and a bivouac area.

**Comment 3:** One comment stated that at a Community Involvement Workshop, held by the Army, a FOCAG representative was surprised to hear an ESCA representative refer to former Army bivouac areas as “campgrounds.” The comment goes on to state that the Army training ranges were used for simulated warfare utilizing both live and practice ammunitions. Simulated warfare involved several days of combat conditions, often with two opposing armies. As it was infantry being trained, foxholes four feet deep were dug. This training took place over decades, training for many different foreign wars, with every type of ammunition available to the United States Army, including Army tank training. The objective was to work as a group to kill the enemy without getting killed yourself. At the end of the simulated combat exercises, infantry troops regularly buried remaining ammunition at the bottom of the foxholes prior to marching back to the

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barracks. It was lighter to walk back without the weight and it saved time and hassle on re-inventories. Ammunition was not just slopped into latrines (outhouses) as alluded to in this report. Also the troops did not bury ammunitions just in your sample grids. The comment quotes page 5 of the Track 1 Plug-In Approval Memorandum, “The County North MRA is open land, and no fences, gates, or barricades restrict access to the property” and concludes that all of the County North MRA was all used for infantry war training exercises.

**Response 3:** Although it is unknown when the exact event in which the representative of the Environmental Services Cooperative Agreement Remediation Program (ESCA RP) Team referred to bivouac areas as campgrounds, the representative of the ESCA RP Team was most likely clarifying the military’s terminology for those attendees of the meeting that may be unfamiliar with military terminology and was not trying to make light of the former use of the area. The term bivouac means a temporary encampment under little or no shelter.

The evaluation for the County North MRA indicated a strong weight of evidence to support that the County North MRA was used for general training and maneuvers and as a bivouac area. Section 4.1 of the Track 1 Plug-In Approval Memorandum describes the training activities that occurred in the County North MRA. As described in Section 4.1, the County North MRA was used to conduct basic combat and tactical training using practice and/or pyrotechnic items that are not designed to cause injury (and not to kill each other, as suggested in the comment).

As discussed in Section 4.1.1 of the Track 1 Plug-In Approval Memorandum, the possibility exists that burial of items did occur. If the burial of unspent ammunition occurred at the County North MRA, these items (commonly referred to as discarded military munitions or DMM) are considered to pose an acceptable risk if encountered for the reasons presented in Section 6.1.4 of the Track 1 Plug-In Approval Memorandum.

**Comment 4:** One comment states that the Track 1 Plug-In Approval Memorandum does not address residual chemical contamination left behind in the soils of these former Army training ranges. It goes on to state that chemical contamination studies on the former Fort Ord were very limited in size and done in 1995. However, it was also done for very few types of chemical contamination.

**Response 4:** This issue is not the subject of the Track 1 Plug-In Approval Memorandum. As stated in the FOSET5 (Administrative Record No. FOSET-004J), no further action related to munitions constituents in soil are recommended for the parcels within the County North MRA. Since the 1995 RI/FS, additional soil investigations have been conducted at the former Fort Ord, including evaluations of metals and explosive compounds in former range areas under the Basewide Range Assessment program. Potential human health and ecological risks related to soil contamination from small arms and military munitions uses are addressed in the following reports:

- The “Final Comprehensive Basewide Range Assessment Report, Former Fort Ord, California, Revision 1,” dated June 2009. (See report at [http://www.fortordcleanup.com/adminrec/ar\\_pdfs/AR-BW-2300J/](http://www.fortordcleanup.com/adminrec/ar_pdfs/AR-BW-2300J/))

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- The “Final Feasibility Study Addendum, Site 39, Former Fort Ord, California,” dated March 28, 2008. (See report at [http://www.fortordcleanup.com/adminrec/ar\\_pdfs/AR-BW-2423F/](http://www.fortordcleanup.com/adminrec/ar_pdfs/AR-BW-2423F/))
- The “Final Basewide Remedial Investigation/Feasibility Study (RI/FS), Fort Ord, California (binders 1 through 18),” dated October 1, 1995 provides information related to the RI/FS for Fort Ord and consists of 6 volumes. Volume I presents an overview and background on Fort Ord and summarizes the results of the Basewide RI/FS. Volume II presents the Remedial Investigations. Volume III presents the Baseline Human Health Risk Assessment. Volume IV presents the Baseline Ecological Risk Assessment. Volume V presents the Feasibility Study and Volume VI presents the response to agency comments received on the draft final version of the RI/FS. The information provided (as it related to Site 39) includes munitions constituents investigation and feasibility study information.  
(See the report available at link:  
[http://www.fortordcleanup.com/docreview/reportsviewdoc.asp?document=BW\\_RIFS\\_list](http://www.fortordcleanup.com/docreview/reportsviewdoc.asp?document=BW_RIFS_list))

**Comment 5:** One comment requests that key documents such as the Federal Facilities Agreement (FFA) of 1990 and the Strategic Management, Analysis, Requirements, and Technology (SMART) Team document should be placed in an appendix of the Track 1 Plug-In Approval Memorandum since sections of it are referred to in the document as justification for the proposed actions.

**Response 5:** The Federal Facilities Agreement (FFA), the FFA Amendment No. 1, and the Strategic Management, Analysis, Requirements, and Technology (SMART) Team documents are available to the public in the Fort Ord Administrative Record as follows:

- The Federal Facility Agreement can be found under Administrative Record No. BW-0119.
- The FFA Amendment No. 1 can be found under Administrative Record No. BW-0119B.
- The SMART Team document can be found under Administrative Record No. OE-0284.

**Comment 6:** One comment questioned the science behind the methodology for applying the Track 1 Plug-In process at the County North MRA as well as the legal justification for applying the Plug-In process to the County North MRA. The comment refers to three attachments (Attachments 1, 2, and 3) included with the comment letter and alleges that carving up portions of the former Fort Ord for inclusion in the Track 1 Plug-In process is creating a new Administrative Record.

**Response 6:** The County North MRA has been identified as a Track 1, Category 3 site and is being proposed for Track 1 Plug-In by utilizing the Track 1 Plug-In process that is described on Pages 14 and 15, and summarized on Figure 1, of the Army’s Track 1 ROD (Administrative Record No. OE-0526). The Army has received similar comments from FOCAG during the public comment period for *Superfund Proposed Plan, No Further Action is Proposed for Track 1 Sites at*

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*Former Fort Ord* in 2004. These and all other public comments received during the Proposed Plan public comment period were evaluated and considered in the decision to take no further action at Track 1 sites. The final decision is documented in the Track 1 ROD. A summary of the public comments and the Army's responses to these comments, including the comments submitted by FOCAG, are included in the Track 1 ROD.

Regarding the statement that a new Administrative Record has been created by utilizing the Track 1 Plug-In process, the Fort Ord Administrative Record is required by the federal Comprehensive Environmental Restoration, Compensation, and Liability Act (CERCLA) and contains information considered or relied on to select the cleanup remedy at the former Fort Ord. No new Administrative Record has been created by proposing the County North MRA for Track 1 Plug-In.

**Comment 7:** One comment requests further clarification on the meaning of “commercial/retail construction, parks, and borderland activities” that appears on Page 7, Section 2.3 of the Track 1 Plug-In Approval Memorandum.

**Response 7:** Section 2.3 titled “Proposed Future Land Use” is intended to describe the proposed future uses of the County North MRA. The majority of the MRA is proposed for habitat reserve or habitat corridor, and therefore no development is proposed for the area. The goal of this land use designation is to protect habitat for the sensitive ecological receptors identified on the former Fort Ord. The remainder of the MRA has been identified as development land use category. Although FORA is not aware of any specific development plans that the County may have for the MRA, the development land use category could encompass a range of uses, which could include infrastructure and/or roadway improvements, construction of non-residential uses such as light industrial/commercial/retail spaces (commercial/retail), or development of a recreation area or managed or maintained park area (parks). For the parts of the development parcels that abut habitat reserve areas, certain approved and restricted activities are allowed within this borderland development area. These borderland activities are described in the Habitat Management Plan (Fort Ord Administrative Record No. BW-1787).

**Comment 8:** One comment refers to Page 9, Section 3.2 of the Track 1 Plug-In Approval Memorandum and notes that this section tells of the 4-foot removal action conducted in 1995 on approximately 2.7 acres of MRS-45. The comment expresses surprise that the removal action was only conducted on 2.7 acres and goes on to state that the BRAC Office was unaware that former Fort Ord was used as an Army tank training area in 1995 and that some of the shells go deeper than 4-feet.

**Response 8:** To clarify, the removal action was conducted on the adjacent California State University Monterey Bay (CSUMB) Off-Campus MRA and extended across the boundary approximately 2.7 acres into the County North MRA. It is important to note that the determination of No Further Action was not made based upon the results of a removal action that covered a small portion of the County North MRA, but rather upon a comprehensive, site-specific evaluation of archival and field-based investigation data collected throughout the MRA during several different investigation and sampling events. The evaluation for the County North MRA indicated a strong

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weight of evidence to support that the County North MRA was used for general training and maneuvers and as a bivouac area, not for an Army tank training area.

**Comment 9:** One comment asks if the acronym PA/SI the new term for “Wide Area Assessment Technology.”

**Response 9:** The acronym PA/SI, which stands for Preliminary Assessment/Site Inspection, is not new terminology. The term PA/SI is used by the EPA as part of CERCLA and the definitions can be found in the National Contingency Plan (40 CFR § 300.5) and on the EPA’s website at the following link: <http://www.epa.gov/superfund/cleanup/pasi.htm>.

**Comment 10:** One comment refers to Page 13, Section 3.2.6 of the Track 1 Plug-In Approval Memorandum and notes that the section describes only brief descriptions of the site walks.

**Response 10:** This section is meant to provide a brief summary of the activities that were conducted as part of the Basewide Range Assessment as they relate to MEC.

**Comment 11:** One comment refers to Page 18, Section 4.1.1 of the Track 1 Plug-In Approval Memorandum and questions what type of unspent ammunition would have been buried in the County North MRA. The comment goes on to state that the Track 1 Plug-In Approval Memorandum does not discuss the constituents of ammunition shells.

**Response 11:** Unspent munitions items (commonly referred to as discarded military munitions or DMM) expected in the County North MRA would consist of blank cartridges, simulators, pyrotechnics, and smoke items.

Regarding the part of the comment that addresses munitions constituents, munitions constituents are not the subject of this Track 1 Plug-In Approval Memorandum. Please see the response to Comment 4 above that addresses munitions constituents in soil.

**Comment 12:** One comment refers the reader to Attachment #3 included with the comment letter and states that Attachment #3 includes legalities, and previous Track 1 Site Summaries that show:

- 1) CERCLA and the NCP have not been adhered to
- 2) Cleanup efforts are inadequate
- 3) Parcels were/are not being cleaned up to a level required by law prior to transfer
- 4) A mathematical equation shows how wrong the “accounting type” practices of clean up are.

**Response 12:** The Army has received similar comments from FOCAG during the public comment period for *Superfund Proposed Plan, No Further Action is Proposed for Track 1 Sites at Former Fort Ord* in 2004. These and all other public comments received during the Proposed Plan public

**RESPONSE TO COMMENTS ON  
TRACK 1 PLUG-IN APPROVAL MEMORANDUM  
COUNTY NORTH MUNITIONS RESPONSE AREA  
FORMER FORT ORD, CALIFORNIA**

comment period were evaluated and considered in the decision to take no further action at Track 1 sites. The final decision is documented in the Track 1 ROD. A summary of the public comments and the Army's responses to these comments, including the comments submitted by FOCAG, are included in the Track 1 ROD.