

DETERMINATION OF NONSIGNIFICANCE

Implementation of Interim Actions for Camp Bonneville, Washington

Description of proposal:

The Proposed Action is to conduct specific interim actions as described in the Prospective Purchaser Consent Decree (PPCD), to be overseen by the Washington Department of Ecology pursuant to the Model Toxics Control Act, to enable the cleanup and ultimate reuse of the Property made available by the closure of Camp Bonneville. Specifically, the PPCD requires the implementation of interim actions related to the investigation and cleanup of the Property. Interim actions have been outlined for the purposes of completion of the SEPA Environmental Checklist.

The Property referenced in this Determination of Non-significance (DNS) is the 3,020 acres of Army-owned property and 820 acres of property the Army leases from the Washington Department of Natural Resources.

The Proposed Action is the implementation of interim actions to restrict access to the Property during investigation and cleanup activities (remedial actions) and reducing the threat to human health and safety associated with military munitions and other contamination. Brush and Munitions and Explosives of Concern (MEC) clearing activities similar to the interim actions have been ongoing within 10 feet of the interior of the Property perimeter and along the Central Impact Target Area (CITA) fence under an Emergency Action required by the PPCD. Interim actions involve the clearing of brush and surface clearance of Munitions and Explosives of Concern (MEC) within a 20-foot swath on each side of identified roads and trails at Camp Bonneville and in the small arms firing ranges for later removal of lead from these ranges

Proponent: Clark County Department of Public Works

Location of proposal, including street address, if any:

Camp Bonneville is located on the western slopes of the Cascade Mountains in the Lacamas Creek Valley in Clark County, Washington, approximately 15 miles northeast of Portland, Oregon, and approximately 10 miles east of Vancouver, Washington. The installation occupies approximately 3,840 acres in sections 34 and 35, Township 3 North, Range 3 East, and sections 1, 2, 3 and 10, Township 2 North, Range 3 East.

Lead agency: Washington State Department of Ecology

The lead agency for this proposal has determined that this proposal does not have a probable significant adverse impact on the environment. An environmental impact statement (EIS) is not required under RCW 43.21C.030 (2)(c). This decision was made after review of a completed environmental checklist and other information on file with the lead agency. This information is available to the public on request.


This DNS is issued under WAC 197-11-340(2); the lead agency will not act on this proposal for 14 days from the date below. Comments must be submitted by February 22, 2007.

Responsible official: Tim L. Nord

Position/title: Land and Aquatic Lands Section Manager

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Date. 4/18/07

Signature 

**REVIEW OF THE IMPLEMENTATION OF INTERIM ACTIONS REQUIRED BY THE
PROSPECTIVE PURCHASER CONSENT DECREE (PPCD)
IN COMPLIANCE WITH THE SEPA ENVIRONMENTAL CHECKLIST**

The Proposed Action, for purposes of this SEPA environmental checklist, is to conduct specific interim actions associated with Remedial Action Units (RAU) 2A and 3 at Camp Bonneville (the Property), as required by the Prospective Purchaser Consent Decree (PPCD). The PPCD is overseen by the Washington Department of Ecology to enable the cleanup and ultimate reuse of the Property made available by the closure of Camp Bonneville. Specifically, the PPCD requires the implementation of interim actions related to the investigation and cleanup of the Property. Specific interim actions have been outlined for the purposes of completion of the SEPA Environmental Checklist.

The Property referenced in this SEPA Environmental Checklist is the 3,020 acres owned by the Bonneville Conservation Restoration and Renewal Team, LLC (BCRRT) and 820 acres leased from the Washington Department of Natural Resources.

The Proposed Action, for the purposes of this SEPA checklist, is the implementation of interim actions, in order to proceed with the investigation and cleanup of the Property and to reduce the threat to human health and safety associated with Military Munitions and other contaminants located within the Property. The Munitions and Explosives of Concern (MEC) surface clearance that will be conducted as part of the overall interim actions will be used to increase the understanding of the presence of MEC across the Property. Interim actions include clearance of vegetation and MEC in a 20-foot area on both sides of all roads and trails and in firing range investigation areas in RAU 2A.

PART A. BACKGROUND

Project Name: Implementation of Interim Actions for Camp Bonneville, Washington.

Applicant Name: Clark County Department of Public Works

Applicant Address and Mr. Jerry Barnett, Project Manager

Phone Number: Clark County Public Works
1300 Franklin Street
Vancouver, WA 98660
(360) 397-6118 x4969

Date Checklist Prepared: January 2007

Agency Requesting Checklist: Clark County

Timing or Schedule: The action will be implemented as soon as possible after all required permits have been issued.

Environmental Information: A number of reports and studies have been prepared for the cleanup and ultimate reuse of Camp Bonneville. During the completion of this SEPA environmental checklist for the implementation of interim actions, the Environmental Assessment (EA) for Disposal and Reuse of Camp Bonneville (2001) was reviewed for existing site information, and the Prospective Purchaser Consent Decree (PPCD) was reviewed for specific information regarding the interim actions. Both documents incorporate by reference a number of other documents previously prepared for the project (see references under the EA and PPCD). Due to the number of reports and studies, they have not been listed. In summary, reports and studies reviewed in conjunction with this checklist include NEPA/ESA compliance documentation, survey reports, investigation reports, remedial investigation/ feasibility studies (RI-FS), sampling and analysis reports, and clean-up action plans. Copies of these reports are available in public repositories¹.

Pending Approvals: Pending approvals specific to the activities included under the Proposed Action include Department of the Army approval of the Explosives Safety Submittal (ESS).

Permit Information: A Programmatic Habitat and Wetland permit has been issued by Clark County for all clearance and maintenance activities along roads and trails within Camp Bonneville.

Project Description: The Proposed Action addressed in this environmental checklist is the implementation of interim actions, in order to proceed with the investigation and cleanup of the Property and to reduce the threat to human health and safety associated with Military Munitions and other contaminants located within the Property. Interim actions include clearance of vegetation and MEC in a 20-foot area on both sides of all roads and trails and in firing range investigation areas in RAU 2A. The MEC clearance that will be conducted as part of the overall interim actions will be used to increase the understanding of the presence of MEC across the Property.

Clearance activities, similar to the proposed actions, have been ongoing at the Property as approved under in the Emergency Action Work Plan (EAWP), specifically, brush and surface clearance of MEC within 30 feet of the interior of the Property perimeter and Central Impact Target Area (CITA) fences.

Existing vegetation will have to be removed to allow surface clearance for MEC to proceed. The procedures approved in the EAWP for anomaly avoidance and brush clearing will be employed to prepare identified areas for surface clearance.

If any MEC are found within the designated clearance areas or if a pattern of similar forensic evidence of a particular type of military munitions is found, the Proposed Action requires the implementation of specific procedures outlined in the IAWP. In the event that UXO (unexploded ordinance) personnel encounter MEC, the item will be marked with pin flags and the location recorded on a hand-held DGPS.

¹ The Public Library located at the Vancouver Mall is the location of one repository.

Prior to Explosives Safety Submittal (ESS) approval, all operations within 50 feet of the MEC item will be halted and a 100-foot exclusion zone around the item will be established. Once the ESS has been approved, the anomaly avoidance procedures will be superseded with the MEC removal procedures.

All MEC items discovered during surface clearance will be investigated by the team leader and the SUXOS for determination of MEC type, and if applicable, type of fuzing. If the item is determined "safe-to-move" it will be transported to a secure storage facility for disposition in accordance with the approved ESS. If items are not "safe-to-move," a disposition plan shall be prepared and coordinated with BCRRT, WDOE, and Clark County. Disposal of MEC items will be conducted according to the approved procedures in the ESS.

Location: Camp Bonneville is located on the western slopes of the Cascade Mountains in the Lacamas Creek Valley in Clark County, Washington, approximately 15 miles northeast of Portland, Oregon and approximately 10 miles northeast of Vancouver, Washington. The installation occupies approximately 3,840 acres in sections 34 and 35, Township 3 North, Range 3 East, and sections 1, 2, 3 and 10, Township 2 North, Range 3 East of the Willamette Meridian.

PART B. Environmental Review

Earth: The majority of the Camp Bonneville area is located in the western slope foothills of the Cascade Mountains in southeastern Clark County, Washington. The western edge of the installation is within the Fifth Plain area, which is generally flat. The elevation at the installation ranges from approximately 300 feet above sea level (along Lacamas Creek) to about 1,640 feet in the southeastern corner of the installation.

Soil types and classification vary across the site. Soils in the eastern and central portion of Camp Bonneville are mainly Olympic series soils, specifically Olympic stony clay loam on areas between a 30 and 60 percent slope and Olympic clay loam on slopes between eight and 30 percent. Within the Lacamas Creek valley, McBee and Cove series soils are located, which are primarily silt or silty clay loams found at slopes ranging from zero to five percent. Finally, along the western edge of the installation, there are Hesson series soils that are gravelly clay loams from zero to 20 percent slopes and clay loam at zero to eight percent slopes. Steep slopes are generally located in the eastern and central portions of Camp Bonneville, but there is no reference to slope stability issues in the EA.

Implementation of the Proposed Action may include some soil or ground disturbance activities associated with clearing and grubbing. Grubbing is the removal of vegetation in order to expose the ground and allow for a visual corridor that is easily maintained around roads, fences, obstacles, etc. However, such activities are expected to be a minimal increase in effort from the ongoing maintenance already occurring onsite. Specifically, the clearing of brush and the surface clearing of MEC along roads and trails and within the firing range investigation areas has the potential to promote increased soil erosion with in this area due to the possible exposure of unprotected soil to the elements (wind, weather, etc). However, these types of activities have been ongoing throughout the use of the site and are not expected to result in more than a low or negligible impact to soils. Specifically, the clearing of brush within the identified areas should not result in increased soil exposure, rather should just result in a reduction of vegetation unless the removal of plant roots is required. The removal of plant roots would only be required in order to gain access for removal of MEC. Surface clearing of MEC is expected to impact the ground surface only, and if a significant number of MEC is found and step-out procedures² are initiated, remediation activities would occur which would expand the area until significant quantities were reduced.

There will be no change to the percentage of the site covered by impervious surfaces as a result of the proposed action. Likewise, no grading or filling is proposed.

² "Step-out clearance" means that if an item of MEC or a pattern of similar forensic evidence of a particular type of military munitions is found within a boundary grid of a designated clearance area, then the clearance area shall be expanded (stepped-out) by adding new grid(s) adjacent to the grid of concern and the new grid(s) shall be cleared.

Although impacts to soils as a result of the emergency actions and step-out procedures are expected to be low or negligible, the use of some standard construction BMPs (phased construction techniques, avoidance of earth moving activities during the wet season) are proposed to minimize effects of soil disturbance. In addition, if clearing activities are occurring in close proximity to surface waters, buffers could be established along riparian corridors to help retain the function of ecosystems and reduce erosive stormwater flows.

Air: Air quality at the Camp Bonneville site complies with air quality standards. Current air emission sources at and around Camp Bonneville include vehicle traffic, ordnance emissions, and building space heaters.

Impacts to air quality at the site, as a result of the proposed action, are expected to be low or negligible. Implementation of interim actions may result in the temporary release of emissions of dust or debris during brush and vegetation clearing activities. Surface clearing of MEC within the identified areas may also contribute emissions associated with the use of mechanical devices for clearing. When more concentrated clearing is required, step-out procedures would be initiated and remediation activities would be completed in accordance with the oversight of the Anomaly Selection Board (ASB) and Ecology. If this action were required, emissions or effects on air quality would be negligible.

Water (Surface and Ground): Parts of Lacamas Creek and its tributaries are located within the installation boundary. Wetlands present at the site are located along Lacamas Creek and its tributaries. Per the EA, there are no significant flood prone areas within the installation, although minor flooding is reported to occur. The EA does not indicate any designated floodplains within the site. Clearance activities will occur within 200 feet of Lacamas Creek, its tributaries and wetlands.

The primary source of discharge into Lacamas Creek is and will continue to be (following Proposed Actions) stormwater runoff from the Bonneville and Killpack cantonments, which is where a majority of impervious surfaces (rooftop and roadway) are located. Runoff is currently conveyed by a system of drainage ditches to Lacamas Creek. Projected pollutants associated with stormwater runoff include bacteria, sediment, trash and debris, metals, hydrocarbons and nutrients.

Potable water is currently supplied to the two cantonment areas via groundwater wells located on each cantonment. The wells pump water to concrete, unlined water reservoirs where it then enters the distribution system. The existing wells at the Bonneville and Killpack cantonments would be used only as an emergency source of water and the supply of potable water during implementation of the Proposed Action is to be provided by the contractors onsite.

The existing sewer system onsite consists of a combination of gravity flow and force main collection system to a lift station located southwest of the Bonneville Cantonment. Wastewater is pumped from the lift station to two concrete aeration ponds. The wastewater is aerated, chlorinated, and there is a surface spray application of the water following treatment. This system is in disrepair and two septic systems have been installed for use during these actions. Implementation of the Proposed Action is not expected to effect or modify the wastewater collection system.

Impacts to surface and groundwater would be low as a result of the Proposed Action. Surface clearing of brush and MEC may result in minor impacts to surface waters if activities are conducted in close proximity to a surface water body. There are no anticipated impacts to groundwater sources.

The proposed action does not require the removal or placement of any material from surface waters or wetlands; nor does it require any surface water withdrawals or diversions.

Best management practices (BMPs) will be followed during clearance activities to minimize any potential impacts to wetlands or water bodies. As impacts are expected to be minimal, no mitigation measures are proposed for the interim actions. Vegetative buffers would be maintained to the extent practicable along riparian corridors to retain the functions of the aquatic ecosystem.

Plants: Camp Bonneville is comprised of forested, undeveloped land, specifically coniferous forest and mixed coniferous and deciduous forest. Shrub communities are found primarily along drainages and

wetland depressions and consist of red alder, hardhack, willows, red osier dogwood, and softstem bulrush, in addition to non-native species such as Himalayan blackberry and scotch broom. There are meadows scattered throughout the upland and wetland portions of the site, and wetlands and riparian areas as well. Suitable habitat exists for Water Howellia (threatened) and Nelson's checker-mallow (threatened), but neither of these species has been confirmed at the site. More diverse plant communities generally surround the Lacamas Creek drainage. Endangered plant species are listed in Appendix D of the EA.

Implementation of the Proposed Action, specifically the clearing of vegetation along roads and trails and within the firing range investigation areas, may impact the plant species in the area of the Proposed Action on a localized basis, as vegetation and habitat would be either removed or altered. However, it should be noted that clearing and removal activities have historically occurred on the Property, and therefore additional impacts would be low or negligible.

Animals: Wildlife inhabiting the Camp Bonneville site includes various species of invertebrates, fish, amphibians, reptiles, birds, and mammals. Specific species currently inhabiting the Camp Bonneville site are listed on page 4-29 to 4-30 of the EA

In 2001, the US Fish and Wildlife Service stated that no listed species and one proposed species (coastal cutthroat trout) were within the project area. Documentation is included as Attachment A of the EA, and a biologic evaluation addressing coastal cutthroat trout, for disposal of Camp Bonneville has also been prepared. The letter from USFW suggests that impacts to proposed species should also be addressed. In 1998, a letter from National Marine Fisheries Service (NMFS) was received that stated that Columbia River steelhead (threatened), Lower Columbia River Chinook salmon (proposed threatened), and Columbia River chum (proposed threatened) may be present within the study area.

Lacamas Dam, approximately 10 miles downstream of Camp Bonneville blocks upstream fish passage, thus Columbia River steelhead, Lower Columbia River Chinook salmon, and Columbia River chum are not found above the dam. However, coastal cutthroat trout, which can become resident above a dam, have been found in electroshocking surveys of Lacamas Creek, above Lacamas Dam. There is no other reference to migration routes in the EA.

The interim actions in the Proposed Action may affect animal species on a localized basis, due to the disruption of habitat during clearing activities. However, as these types of maintenance activities have been ongoing, the impacts to wildlife should be low or negligible compared to impacts already observed. A majority of the clearing proposed under the interim actions will occur alongside existing roads and trails. If more concentrated clearing is required, step-out procedures would be initiated and remediation activities would be completed in accordance with the oversight of the ASB and Ecology. If this action were required, impacts to wildlife are still anticipated to be minimal.

Any MEC discovered during surface clearance will be evaluated to determine whether or not they are safe to move. If so, they will be transported to a secure storage facility. If not, the item will be exploded in place. The impact of the action may temporarily disturb wildlife in the area due to the noise associated with the explosion. These impacts will be temporary and will be minimized through the use of sandbag mitigation. The sandbag mitigation requirements are outlined in the ESS.

As discussed above, no major impacts have been identified resulting from the Proposed Action, and thus no mitigation measures are required.

Energy and Natural Resources: Electrical power is supplied to the installation area by overhead service lines and an underground cable from Clark County Public Utility District No. 1. Heat is provided to buildings in the cantonment area by either individual oil furnaces (not currently in use) or electrical heaters in each building. Existing sources of power and heat would be maintained during implementation of interim actions. The proposed action does not have the potential to impact solar energy use on adjacent properties. No impacts are expected because no modifications are proposed for the existing energy sources during the Proposed Action.

Environmental Health (Hazards): There are a number of environmental health hazards currently present on the site. As a result of the Proposed Action, surface clearing of MEC would occur in order to lessen or remove environmental health hazards. Remediation of remaining environmental health hazards is addressed in the PPCD.

Currently, there are a number of onsite facilities being used to store materials and wastes associated with vehicle maintenance, facility maintenance, and water treatment. A listing of historic and current materials being stored onsite is reported in Tables 4-7 and 4-8 of the EA. On-site, potential sources of soil and groundwater contamination have been documented and referenced in previous investigations. Such sources included in the past waste materials from Army field training activities (chemical warfare kits, medical wastes from mobile field medic stations, ordnance or propellants), historic landfills, burn areas, paint and solvent disposal areas, grease pits, former sewage ponds, and above ground storage tanks (ASTs) for storage of heating oil and/or fuel.

An archive search report in 1997 indicates that throughout approximately 3,200 acres of the Camp Bonneville site, there is a potential for unexploded ordnance (UXO), ranging from small arms ammunition to mortars, rockets, and grenades, due to the onsite activities from 1910 to the 1970's. Ordnance and explosives sampling conducted in 1998 led to the identification, detonation, and removal of UXO items and scrap metal, although the current cleanup team with Ecology is currently preparing a report to determine actions regarding further investigations and remediation.

In addition to the hazards listed above, there is reported presence of asbestos in some of the buildings in Camp Bonneville, potential presence of polychlorinated biphenyls (PCBs), and the use of lead-based paint on buildings. With regards to the lead based paint, a soil-metals survey was conducted in 1996 at specified locations (adjacent to buildings), and the lead concentrations exceeded the cleanup threshold for residential soils of 250 mg/kg.

There have been numerous investigative and feasibility reports completed for the site, as documented in the EA and PPCD. In addition, initial remedial activities have already occurred onsite. The Vancouver Fire Department provides all emergency response including advanced and basic life support, and fire response at Camp Bonneville and Camp Killpack cantonments. WADNR provides fire response for non-structures at Camp Bonneville overall.

Specific to the Proposed Action, implementation of interim actions would result in beneficial direct and indirect impacts on environmental health hazards. Interim actions, implemented to reduce the threat to human health and safety as a result of the investigation and cleanup of the Property, include the cleanup of MEC during clearing of vegetation along all roads and trails and within the firing range investigation areas.

Although the proposed actions would not require mitigation because of the net beneficial effects, a potential mitigation measure referenced in the EA, applicable for this Proposed Action is the implementation of a spill prevention program that would minimize the potential for petroleum product spills during construction, demolition, and renovation activities.

Environmental Health (Noise): Current sources of noise at Camp Bonneville are associated with vehicle traffic and the FBI firing range, the only active firing range onsite, which is used between 60 and 80 days per year. Existing cleanup activities, such as unexploded ordnance detonation, also temporarily produce high noise levels.

Implementation of the Proposed Action could result in low impacts related to noise levels. Specifically, the clearing of vegetation surrounding the perimeter fence and the fence repair activities could result increased noise levels, as machinery would likely be used for these activities. However, given that the surrounding land use is primarily open space and undeveloped, it is expected that these site-specific activities would have a low to negligible impact to the surrounding areas.

Any MEC discovered during surface clearance will be evaluated to determine whether or not they are safe to move. If so, they will be transported to a secure storage facility. If not, the item will be exploded in place. The impact of this action will temporarily increase noise levels in the vicinity of the operation.

These impacts will be temporary and will be minimized through the use of sandbag mitigation. The sandbag mitigation requirements are outlined in the ESS.

Although not required, there are proposed mitigation measures for noise described in the EA. As related to Proposed Action, mitigation measures could include limitations on the hours of operation to reduce off-site noise effects.

Land and Shoreline Use: Camp Bonneville itself is comprised of two small cantonment areas (Bonneville Cantonment and Killpack Cantonment) that together cover about 30 acres. The cantonment areas represent the most impervious and densely developed portions of the site. The remainder of the installation area includes 18 training areas, 28 firing ranges, and a 1,500-foot long helicopter landing area, all areas of which generally look similar to a park. There are also some forest management areas onsite. Adjacent, surrounding land use is predominantly agricultural, rural residential, and forest.

The Camp Bonneville facility was used as a military training facility; thus there were no permanent residences. Most structures onsite are located at the cantonment areas and include 22 barracks, 2 dining halls, 1 classroom building, 4 latrines, 1 command post, 3 ammunition bunkers, 1 parade field, 1 training building, 7 storage facilities, 1 well house/water treatment facility, 1 well pump house, 1 grounds maintenance shop, 1 sanitary sewer lift station, 1 reservoir, and 1 vehicle maintenance shop (see Tables 4-2 and 4-3 of the EA). There are also two buried, parallel natural gas pipelines running across the southeastern portion of the installation.

All of Camp Bonneville is within the planning jurisdiction of Clark County, Washington. The Clark County Department of Community Development carries out comprehensive planning. The zoning and comprehensive designation of the Property site is Forest Tier I-80 and Forest Tier I (large land parcels that can produce forest and mineral products), respectively. There are no federally designated critical habitats on Camp Bonneville, although there is habitat for threatened and endangered species. There are wetlands (as identified by the Army Corp of Engineers and the National Wetland Inventory) and a surface water body (Lacamas Creek) present onsite.

Currently (per the EA) there are 31 employees of Camp Bonneville (25 training personnel and six permanent work force personnel). The number of people that use and/or train at the facility are not mentioned. Following reuse of the site (medium-low intensity), there are expected to be 110 employees and attract 540 visitors daily, on average. Additionally, a few of the barracks at the Killpack Cantonment are being used as temporary offices by project team members.

The implementation of interim actions per the Proposed Action are consistent with past and current maintenance activities, thus they would not result in any additional impacts to land use as a result of the clearing activities.

Housing: Camp Bonneville is a military training center and provided temporary housing (via barracks). The barracks are wood structures with either wood or concrete floors and were constructed in the 1920's and 1930's. The barracks have been inactive since 1996, and since 1996, no military personnel have been housed onsite.

One building at each of the Cantonments will be renovated and serve as residences for the duration of the project.

Aesthetics: The existing Camp Bonneville site is comprised of developed areas (the Killpack and Bonneville Cantonments) and forested hills making up the training grounds, firing ranges, and remainder of the installation. Structures at the Bonneville cantonment are single-story rectangular, brown, and wood-shingled; structures at the Killpack cantonment are similar, except they are painted white with olive green trim. Areas surrounding the cantonments are heavily forested rolling hills, similar to the natural scenery surrounding the installation itself.

Access to the Property will be restricted during investigation and cleanup activities and to reduce threats to human health and safety during remediation activities. Minor MEC clearing and potential initiation of step-out procedures, would have a negligible impact to aesthetics at the site.

Light and Glare: As mentioned previously, the Camp Bonneville installation area is comprised of 30 acres of developed cantonments and the remaining 3,800 acres is primarily natural landscape, made of rolling, forested hills. Structures within the cantonments themselves are sources of light. Electrical power is also supplied to the firing ranges.

Depending upon the site characteristics, implementation of interim actions, specifically the MEC clearing and possible initiation of step-out procedures, could require the use of artificial lighting. However a majority of the area within the installment is forested, thus impacts of localized lighting as a result of the implementation of the Proposed Action should be minimal (low). As mentioned previously, limits on the time of day for which construction could occur is a proposed mitigation measure that could be implemented for this Proposed Action, to minimize temporary impacts associated with light and glare.

Recreation: There are numerous recreational opportunities within Clark County, in areas surrounding Camp Bonneville. Past use of Camp Bonneville was not recreational in nature, as it was a military training ground and firing range that has since been inactivated.

Implementation of the Proposed Action would have a negligible impact to recreation, as the site is not currently used for recreational purposes. However, by conducting the interim actions, the recreational potential of the site is increased.

Historic and Cultural Preservation: Camp Bonneville buildings and structures have been evaluated twice for National Register of Historic Places (NRHP) eligibility, in 1986 and 1997. During both inspections, Camp Bonneville all buildings were determined to be ineligible for the NHRP.

The EA contains an overview of the Camp Bonneville area including prehistory, ethnohistory, and history in Appendix H. Four archeological investigations have been conducted at the Camp Bonneville site from 1979 to 1998, although none of the investigations have been a systematic, system-wide survey because of the potential safety issues associated with the unexploded ordnance. Per the archeological investigations, there were some areas of cultural relevance discovered (see EA Section 4.11.1). During the first investigation, two prehistoric isolated finds and three historic land use areas were discovered. The finds, however, only contained individual artifacts and thus were not eligible for the NHRP. The three historic land uses contained limited assemblages and lack of association with significant persons or history, such that if evaluated, would unlikely meet the criteria of NHRP. During the second investigation, remains of 10 aligned fruit trees were discovered, which are shown on a 1916 map of the area. The third investigation uncovered one small prehistoric campsite, but the site was too disturbed by construction and training activities to be eligible for NHRP. Finally, the fourth investigation identified the historic remains of an orchard, fruit trees, homestead foundation, and various other prehistoric artifacts, but based on preliminary examination, these artifacts do not appear to meet the criteria for NHRP either. There have been no Native American resources reported at Camp Bonneville. However, the Cowlitz Tribe has located, documented and forwarded to the Army both oral history and other facts that characterize the types of cultural resources likely to occur on the Camp Bonneville Site. Because of this, Ecology intends to involve the Tribe in development of cultural protection measures to be taken during this action.

As a result of Proposed Action, there are no direct or indirect impacts expected because there are no eligible NRHP archeological sites or buildings found onsite. There is no known Native American traditional cultural properties so there would not be any impacts expected for those type resources either. In addition, as required by the PPCD (page 18, paragraph 113) a Cultural Resource Protection Plan has been developed. Furthermore, The Finding of Suitability for early Transfer and the Programmatic Agreement between the Army, State, County and Tribe also describes and controls cultural resource protection. Finally, all individuals conducting vegetation or MEC clearance are required to attend a Cultural and Archaeological Training.

Transportation: The primary roads servicing the Camp Bonneville location are Fourth Plain Road, 182nd Avenue, 83rd Street, 222nd Avenue, 88th Street, and Pluss Road (main access road). Based on traffic studies, the roads to the west of Camp Bonneville (182nd Avenue, Ward Road, 88th Street) are operating at a level of service (LOS) C while the minor roads to the east of the three roads previously referenced are operating at a LOS B. Average daily traffic counts show a general reduction in vehicles as a result of

the closure of Camp Bonneville in 1996. Internal roads in Camp Bonneville include approximately 1.5 miles of 20-foot wide paved roads and 14 miles of 12-foot wide primary and secondary use compacted gravel roads. There are also approximately 40 miles of narrow dirt roads on the installation. The EA does not reference public transportation available onsite or in close proximity to the installation.

There are no direct or indirect impacts expected as a result of the implementation of Proposed Action, as interim actions are similar to the ongoing maintenance activities already conducted at the site. Clearing of MEC and initiation of step-out procedures would only impact traffic within the Camp Bonneville property.

Public Services: The Vancouver Fire Department provides all emergency response including advanced and basic life support, and fire response to the structures area at Camp Bonneville. For law enforcement, the Clark County Sheriffs Office would be the first to respond, followed by the Vancouver Police Department and/or FBI if a major disturbance occurs. The Washington Department of Natural Resources (DNR) responds in the case of a forest fire at Camp Bonneville. American Medical Response provides transportation in case of medical emergencies and the closest hospital is the Southwest Washington Medical Center, located in Vancouver.

As a result of the Proposed Action, there would be no direct or indirect impacts expected for the current public service providers. The interim activities are consistent with the ongoing maintenance activities that have been occurring onsite, thus are not expected to result in increased effort for local emergency response agencies.

Utilities: Currently, Camp Bonneville has potable water supply, fire protection, sanitary wastewater collection, stormwater collection, power, heat, solid waste collection, and telecommunications. Description of the existing public service conditions is included in Section 4.7 of the EA.

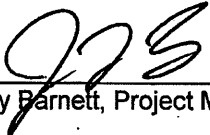
As a result of the Proposed Action, there would be no direct impacts to utilities. Interim actions, including the surface clearing of vegetation and the minor surface clearing of MEC would only result in an indirect impact to utilities if the clearing activity inadvertently caused disruption to the utility (e.g., power lines, telecommunication lines, etc).

Summary

Based on the description of existing site conditions, documented in the EA, and description of interim actions (the Proposed Action) in the PPCD, it was determined that implementation of the Proposed Action would have little to no significant impact on the quality of natural or human environment. The emergency actions, specifically the clearing of brush and surface clearing of MEC and the potential for initiation of the step-out actions are considered to be minor activities in magnitude, and the associated impacts would be low and considered non-significant. This document has been reviewed and submitted to Ecology.

PART C. SIGNATURE

The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.

Signature:  _____
Jerry Barnett, Project Manager, Clark County Public Works

Date Submitted: 1/12/07