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

This Proposed Action, for purposes of this SEPA environmental checklist, is to conduct specific emergency actions at Camp Bonneville, as described in the proposed 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 emergency actions related to the investigation and clean up of Property. Emergency 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 of Army owned property and 820 acres of property the Army leases from the Washington Department of Natural Resources.

The Proposed Action, for purposes of this SEPA checklist, is the implementation of emergency actions to restrict access to the Property during investigation and clean up activities (remedial actions) and reducing the threat to human health and safety associated with military munitions and other contamination. Maintenance activities similar to the emergency actions have been ongoing at the Property but have not occurred in the last few years due to the closure and transfer activities. Emergency actions involve the clearing of brush and surface clearing of Munitions and Explosives of Concern (MEC) within 30 feet of the interior of the Property perimeter and Central Impact Target Area (CITA); the repair of the Camp Bonneville perimeter fence; the repair of the CITA fence; and the installation of signage on the fence at 50-foot intervals. These clearing and repair activities apply to approximately 60,000 feet of perimeter fence (clearing area ~ 14 acres) and 19,000 feet of CITA fence (clearing area ~ 4 acres).

Although minimal surface clearing of MEC would be conducted as part of this emergency action, 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 initiation of step-out clearance. Step-out clearance procedures are described in the PPCD and Conceptual Remediation Action Plan (CRP) and require the expansion of the clearance area to 100 feet by 100 feet and a review and recommendations from the Anomalies Selection Board (ASB) and Ecology before proceeding with the clean up. The area or amount of clearing if the step-out procedures are initiated is not or cannot be defined but would be minimized based on the recommendations from the ASB and Ecology. The expectation would be that when the amount of forensic evidence found during the step-out process starts to reduce, the area that would be cleared would also be minimized. The step-out action would be the expansion of the initial action of clearing of vegetation to expose any MEC and is expected to be a minimal impact to the all resources.

Part A Environmental Review

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

Applicant Name: Clark County, Washington

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Date Checklist Prepared: June, 2006

Agency Requesting Checklist: Washington Department of Ecology

Timing or Schedule: The action would be implemented immediately after entry of the Prospective Purchaser Consent Decree in Superior Court.

Environmental Information: There are a number of reports and studies that have been prepared for the cleanup and ultimate reuse of Camp Bonneville. To complete this SEPA environmental checklist for the Proposed Action described above, the Environmental Assessment (EA) for Disposal and Reuse of Camp Bonneville (2001) was reviewed for existing site information, and the draft Prospective Purchaser Consent Decree (PPCD) was reviewed for specific information regarding the emergency actions. Both documents incorporate by reference a number of other documents previously prepared for the project (see references under the EA and Prospective Purchaser Consent Decree). Due to the number of reports and studies, they have not been listed. In summary, such reports and studies include NEPA/ESA compliance documentation, survey reports, investigation reports, remedial investigation/ feasibility studies (RI-FS), sampling and analysis reports, and clean-up action plans which were reviewed in conjunction with this checklist and are attached.

Pending Approvals: Pending approvals specific to the activities included under the Proposed Action include the completion the draft Prospective Purchaser Consent Decree after public comment, and its final entry in Superior Court.

Permit Information: No local permitting would be necessary for the emergency actions and step-out process as outlined in the RI/FS that is attached.

Description: The Proposed Action addressed in this environmental checklist is the implementation of emergency actions, in order to restrict access to the Property during investigation and clean up activities (remedial actions) and reduce the threat to human health and safety associated with military munitions and other contamination. Emergency actions involve the clearing of brush and surface clearing of Munitions and Explosives of Concern (MEC) within 30 feet of the interior of the Property perimeter and Central Impact Target Area (CITA); the repair of the Camp Bonneville perimeter fence; the repair of the CITA fence; and the installation of signage on the fence at 50-foot intervals. These clearing and repair activities apply to approximately 60,000 feet of perimeter fence (clearing area ~ 14 acres) and 19,000 feet of CITA fence (clearing area ~ 4 acres). Initiation of the step-out process would require additional oversight from the ASB and Ecology but the expected level of effort would be similar to that of the other emergency action activities, only with an expanded area of influence.

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 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.

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 1640 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 the Olympic stony clay loam on areas between a 30 and 60 percent slope and the 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, emergency actions such as the clearing of brush and the surface clearing of Munitions and Explosives of Concern (MEC) within 30 feet of the interior of the Property perimeter and Central Impact Target Area (CITA) 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 type activities have been ongoing throughout the duration of site use and are not expected to result in more than a low or negligible impact to soils. Specifically, the clearing of brush along the fence line should not result in increased soil exposure, rather should just result in a reduction of vegetation unless the removal of plant roots is required. Surface clearing of MEC is expected to impact the ground surface only, and if a significant number of MEC is found and step-out procedures are initiated, remediation activities would occur which would expand the area until significant quantities were reduced

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 for mitigation 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.

As a result of the Proposed Action (implementation of emergency actions), impacts to air quality at the site are expected to be low or negligible. Implementation of emergency actions may result in the temporary release of emissions of dust or debris during localized brush and vegetation clearing activities along the fence line and fence repair activities. The limited surface clearing of Munitions and Explosives of Concern (MEC) within 30 feet of the interior of the Property perimeter and Central Impact Target Area (CITA) would not be expected to contribute emissions, as this activity would not involve mechanical devices, and 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, emissions or effects on air quality would be negligible.

Water (Surface and Ground): Lacamas Creek is the only surface water body within the installation boundary. 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.

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 local water district would supply potable water during implementation of the Proposed Action.

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. 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 within 30 feet of the interior of the Property perimeter and CITA and fence repair activities 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. As impacts are low or negligible, no mitigation measures are required for the emergency actions. However, best management practices (BMPs) would be installed during construction activities (fence repair) to minimize potential erosive flows and sediment loads from entering Lacamas Creek. Vegetative buffers would be installed 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. Scrub-shrub is found primarily along drainages and wetland depressions and consists of red alder, hardhack, willows, red osier dogwood, and softstem bulrush, in addition to non-native specifies 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. Habitat exists for the Water Howellia (threatened) and Nelson's checker-mallow (threatened), but neither of these species has been confirmed present 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 Proposed Action, specifically the clearing of vegetation along the Property perimeter fence and CITA, 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 been occurring 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 is included as Attachment I. 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, the 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 Emergency actions in the Proposed Action may affect animal species on a localized basis, due to the temporary disruption in habitat during clearing activities and fence repair. However, as these type maintenance activities have been ongoing, the impacts to wildlife should be low or negligible compared to impacts already observed. 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 would still be negligible.

As discussed above, no major impacts have been identified resulting from the Proposed Action, and thus no mitigation measures are required. Mitigation measures affecting wildlife would be implemented as a result of activities discussed in subsequent environmental checklists.

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 individual oil furnaces in each building. Existing sources of power and heat would be maintained during implementation of emergency actions. 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, fence repair and surface clearing of MEC would occur in order to lessen or remove environmental health hazards. Remediation of the remaining environmental health hazards will be addressed in via the Prospective Purchaser Consent Decree, and subsequent environmental checklist documents will be developed for those actions.

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 include 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 ASTs for storage of heating oil and/or fuel.

An archive search report in 1997 indicates that throughout approximately 3200 acres of the Camp Bonneville site, there exists the 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 Army 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 conducted in 1996 at specified locations (adjacent to buildings), and the lead concentrations exceeded the cleanup level 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 Prospective Purchaser Consent Decree. In addition, initial remedial activities have already occurred onsite. The Vancouver Fire Department provides all emergency response including advanced and basic life support, hazardous material clean up, and fire response at Camp Bonneville.

Specific to the Proposed Action, implementation of emergency actions would result in beneficial direct and indirect impacts on environmental health hazards. Emergency actions, which are implemented to reduce the threat to human health and safety as a result of the investigation and clean up of the Property, include the limited clean up of MEC during clearing of vegetation along the perimeter fences and the repair of the perimeter fence.

Although emergency actions would not require mitigation because of the net beneficial impacts, 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 clean up 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 not expected that these site-specific activities would have a low to negligible impact to the surrounding areas.

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 construction 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 populous 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/treatment, 1 well pump house, 1 grounds 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 Camp Bonneville site is designated as FR-80 (large land parcels that can produce forest and mineral products). 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.

The implementation of emergency actions per the Proposed Action are consistent with past maintenance activities, thus there would not result in any additional impacts to land use as a result of the clearing or repair activities covered under the emergency actions.

Housing: As mentioned under the land and shoreline use section, there are no permanent residences at Camp Bonneville, as the site is a military training center and provides 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.

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 installment itself.

Implementation of the Proposed Action is intended to restrict access to the Property during investigation and clean up activities and reduce threats to human health and safety during remediation activities. Emergency actions such as fence repair and the clearing of vegetation along the perimeter fenceline enhance aesthetics. 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 3800 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 emergency 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 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 emergency actions, the recreational potential of the site is increased.

Historic and Cultural Preservation: Camp Bonneville buildings and structures have been evaluated twice for NRHP eligibility, in 1986 and 1997. During both inspections, Camp Bonneville 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.

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.

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 Camp Bonneville installation closure 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 emergency actions are similar to the ongoing maintenance activities already conducted at the site. Clearing of MEC and initiation of step-out procedures would impact traffic only within the Camp Bonneville area itself and only if clearing is occurring adjacent to or within the roadway.

Public Services: The Vancouver Fire Department provides all emergency response including advanced and basic life support, hazardous material cleanup, and fire response at Camp Bonneville. For law enforcement, the Clark County Sheriff's 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 emergency 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. Emergency actions, including the surface clearing of vegetation along the perimeter fence and the minor surface clearing of MEC, would result in only 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 emergency 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 MECs within 30 feet of the interior of the perimeter and CITA fence (approximately 18 acres total area), the repair of the Camp Bonneville perimeter and CITA fence (approximately 80,000 linear feet), and the installation of signage on the fence at 50-foot intervals 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.

Responsible official: Tim L. Nord

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Date: 8/1/06 Signature: _____