Site Cleanup:

Camp Bonneville

Vancouver, WA

Public Participation Plan

April 2, 2004

Prepared by Washington State Department of Ecology



With input from the Army

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This Plan is for You!

This public participation plan has been prepared for the Camp Bonneville cleanup as part of the requirements of the Model Toxics Control Act. The plan was written for you, the public. We want you to know that you will have many opportunities to learn about the cleanup at Camp Bonneville and to share your comments about plans for cleaning up the site. The plan is intended to encourage coordinated and effective public involvement tailored to the community's needs at Camp Bonneville.

This plan was developed with you in mind. It is based on information received from your community during interviews held in the winter of 2004. There is a lot of information in this plan to help you learn more about the history of the site, the cleanup process, and how you can get involved. Section 4 provides details about the public participation strategy.

For those who would like a quick reference to the current status at Camp Bonneville and the public involvement opportunities, head straight to **Table 1 (pages 7 – 9)**. The table, along with the rest of the plan, will be updated to reflect changes and adjustments based on the cleanup process and community interest.

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1.0 INTRODUCTION

Overview of the Site

The Camp Bonneville Military Reservation site (Camp Bonneville) is located on approximately 3,840 acres of which 820 acres are state-owned land. Camp Bonneville is situated five miles east of Vancouver City limits in Clark County. The Department of Defense (DoD) owned and operated Camp Bonneville for firing range practice and training from 1910 to 1995. During that time, various military ammunitions were used or disposed of at the site.¹ The historical use of Camp Bonneville resulted in the presence of unexploded ordnance (munitions that did not detonate) and the release of contaminants to the environment. The Department of the Army (Army) has accepted responsibility for cleaning up the site to protect human health and the environment in accordance with the state cleanup regulations. Since the official closure of Camp Bonneville in 1995, there have been ongoing investigations to characterize the contamination from the ammunitions and other hazardous substances.

An Enforcement Order was issued on February 4, 2003, by the Washington State Department of Ecology (Ecology). The Enforcement Order establishes requirements and deadlines for the Army to investigate and cleanup the site. Ecology is the lead regulatory agency with primary responsibility to oversee the cleanup actions performed by the Army. While the site is being cleaned up under the Washington State cleanup law, the Army also remains responsible for complying with the federal cleanup law (Comprehensive Environmental Response, Compensation, and Liability Act-CERCLA).

One important requirement of the enforcement order is to provide opportunities for the public to participate in the review process and comment on proposed actions at key points in the cleanup. This public participation plan was written to encourage coordinated and effective public involvement tailored to the community's needs at Camp Bonneville. It describes how individuals (or groups) can obtain information and influence decision-making. In addition, the plan identifies current community concerns about the cleanup and outlines the strategy for public participation events that will take place. The Army and Ecology are committed to an open dialogue with the community to ensure that interested parties can receive information and provide input.

Background Information on the State Cleanup Law

Contaminated site cleanup in Washington State falls under a state cleanup law called the Model Toxics Control Act (MTCA), which states that a current or past owner or operator may be held responsible for cleanup of contamination to standards that are safe for both human health and the environment. The Washington State Department of Ecology (Ecology) is responsible for implementing this state law and overseeing cleanups throughout the state, and has issued regulations and guidance governing those cleanups. Ecology investigates any report of property contamination, and if it presents a significant threat to human health or the environment, the site is placed on the Hazardous Sites List. The cleanup process then begins.²

¹ Munitions include artillery ammunition, mortar ammunition, grenades, fuses, and small arms ammunition, shoulderfired rockets, air-launched rockets (destroyed only), guided missiles (destroyed only), bombs (destroyed only), land-mines (practice only). The munitions that were 'destroyed only' were detonated at the landfill for disposal purposes. ² Washington State Department of Ecology. *Burlington Northern Santa Fe Former Maintenance and Fueling Facility Public Participation Plan*, August 1, 2001.

The cleanup law identifies key points in the cleanup process that public notice and opportunity to comment must occur. Neighboring residents, businesses, and other interested parties are given the opportunity to provide information that may influence the investigation and cleanup of contaminated sites to help assure that cleanup actions protect people and the environment. The regulation requires early planning and development of a site-specific public participation plan. The plan is intended to encourage coordinated and effective public involvement tailored to the public's needs at a particular site. According to the cleanup regulations, "the scope of the plan shall be commensurate with the nature of the proposed remedial actions, the level of public concern, and the risks posed by the facility."³

The public participation plan will set up the framework for the open dialogue between interested community members, Ecology and the Army by outlining the community involvement activities that will occur during the site investigation and remediation based on the cleanup regulations.⁴ The plan, which is based on feedback received from community interviews conducted during the winter of 2004, will describe the ways community members can stay informed about site cleanup activities and participate in decision-making. For each phase of work not covered under this plan, the public participation plan will be updated, or a new plan will be developed.

This public participation plan includes information about the basic public participation requirements, which include:

- notifying the public about available site-specific reports and studies;
- notifying the public about public comment opportunities during specific phases of the cleanup;
- providing for appropriate public participation methods such as informational mailings or meetings; and
- considering public comments received during public comment periods⁵

Additional activities can be undertaken, such as interviews with community members, community group briefings, or workshops, particularly if public interest and concern warrant these activities.

Goals of the Public Participation Process

The primary goal of the public participation process is to allow the potentially affected community to contribute to the decision-making processes concerning site investigation and remediation in an informed and meaningful way. To accomplish this goal, the Army and Ecology will:

- Provide Information Provide people in the affected community with timely, understandable, useful, and accurate information, so they are aware of opportunities to comment and are prepared to give informed and meaningful input.
- Provide Meaningful Opportunities for Input Ensure that the community has an opportunity to comment on draft reports and plans at key points in the site investigation and remediation process, and ensure that comments are considered before final decisions are made.

³ Washington State Department of Ecology, *Model Toxics Control Act Regulations, WAC 173-340-600, Public Notice and Participation,* February 2001.

⁴ Washington State Department of Ecology, Model Toxics Control Act Regulations, WAC 173-340, February 2001.

⁵ Responses to comments will be provided in a summary letter, which will indicate how comments were used.

- Be Responsive Respond in a timely manner to the comments and requests for information about the cleanup by the community as they relate to the investigation and remediation of this site.
- Facilitate Communication Facilitate and encourage open, communication among the potentially affected community, Ecology, and the Army.

Roles and Responsibilities

Public participation activities for the cleanup process are coordinated between Ecology and the Army.⁶ Ecology maintains overall responsibility and approval authority for the activities outlined in this plan in accordance with the cleanup regulation requirements. The Army and Ecology will conduct public notice, which includes soliciting, receiving and considering comments, and preparing a record that documents comments received. The public will be notified of comment periods that occur at specific points in the site investigation and cleanup process (usually following submission of specific reports to Ecology) as required by the state's cleanup law. The community is provided with the opportunity to review and, through public comment, share concerns or contribute information that may influence decisions about the cleanup.

Organization of the Public Participation Plan

This plan provides an overview of the cleanup process, background information about the site, an overview of the community and plans for public involvement regarding the site. Proposed activities that will be used to raise awareness and to seek input from the community are also described. Other information needed to implement the public participation plan (e.g., locations of information centers and a list of organizations contacted) is included.⁷ Ecology and the Army urge the public to become involved in the cleanup process. This plan is intended to be a dynamic working document that will be updated as new community concerns emerge and more information becomes available during the cleanup process. If any groups would like more information or have questions or comments on the plan or other aspects of the cleanup, they are welcome to contact one of the people listed below. Ecology's website and information centers also provide more detailed information.

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⁶ After the issuance of the enforcement order by Ecology, the U.S. Environmental Protection Agency Region 10 decided to withdraw from their concurrent oversight role and allow Ecology to have full oversight at the site (letter from EPA to the Ft. Lewis Commander dated July 16, 2003).

⁷ Information centers are often referred to as information repositories.

2.0 SITE BACKGROUND

Site Description and Location

Camp Bonneville is located in Clark County, Washington, near the unincorporated town of Proebstel, and approximately five miles east of the city of Vancouver (see Appendix E for map). It is situated on the western slopes of the Cascade Mountain Range. The western portion of the installation consists of low hills and the low plain of the Lacamas Creek valley whereas the remainder of the installation is comprised of the steeper hills of the westernmost Cascade Mountain

Range foothills. Elevations range from approximately 290 feet in Lacamas Creek at the southwest corner of the installation to 1,000 feet in the northwest, 1,350 feet in the southeast, and approximately 1,450 feet at the center of the installation.

The area surrounding Camp Bonneville is sparsely populated with scattered residences and is used primarily for agriculture and livestock grazing. The zoning at Camp Bonneville is FR-80; i.e., forest zoning with an 80-acre minimum lot size.⁸ Neighboring properties are zoned FR-80, FR-40 (forest zoning with a 40-acre minimum lot size), R-5 (rural estate zoning with



a minimum 5-acre lot size), and R-10 (rural estate zoning with a 10-acre minimum lot size). Although current zoning permits nothing smaller than a 5-acre lot size, many residences on much smaller lots were approved prior to the adoption of the current standards. Increased residential development and population growth has occurred in the past few years in eastern Clark County, which is the fastest growing county in Washington, with an estimated population of 372,000 in the year 2003.⁹

Camp Bonneville encompasses approximately 3,840 acres. Two areas within Camp Bonneville totaling 820 acres are currently leased from the Washington Department of Natural Resources. The future ownership of the Camp Bonneville property has not been decided. The decision will eventually be made through the military land-use transfer process. In the meantime, decisions and actions taken to clean up the property will be based on measures that are protective of the health and safety of people and of the environment consistent with the current and future land use in the area.

General History of Camp Bonneville

Camp Bonneville was established in 1909 as a drill field and rifle range. Several military training programs used the site through the years, including troops from Vancouver Barracks. The range had been used for training with assault weapons, artillery, and field and air defense artillery. Up until the late 1980s, Camp Bonneville was opened to local equestrians and hunters, as well as for overnight use of the cantonment areas (the temporary living quarters that were built by the Army

⁸ Otak, Inc. 1998. *Camp Bonneville Draft Reuse Plan*. Prepared for Camp Bonneville Local Redevelopment Authority. September.

⁹ Washington State Office of Financial Management, 2003 Population Trends for Washington State.

for soldiers) by 4-H groups, and school districts for outdoor schools when the site was not being used for military training exercises.¹⁰ When Vancouver Barracks was decommissioned in 2001, Camp Bonneville became a sub-installation of Fort Lewis, Washington. Currently, the Federal Bureau of Investigation (FBI) makes frequent use of one of the firing ranges.

In 1995, the Camp Bonneville Military Reservation was selected for transfer and reuse under the Base Realignment and Closure (BRAC) program and all active military training units ceased operations at the camp.¹¹ As part of the BRAC process, the community is asked to form a local redevelopment authority to prepare a reuse plan for the property. The local redevelopment authority typically includes any jurisdictions, such as cities and counties, in which the military base is located. Since Camp Bonneville is in Clark County and is not within any city boundaries, Clark County formed the officially recognized Camp Bonneville local redevelopment authority in November 1995.

A five-member Reuse Planning Committee was appointed by the Clark County Board of County Commissioners to oversee the land reuse planning process. Altogether, 250 members of the community offered input into the creation of a reuse plan for Camp Bonneville that would reflect the community's views on how the property should be developed. It was designed to balance activities for public recreation and education with open space and wildlife areas. The Reuse Plan was drafted in 1998 and finalized in 2003.¹²

The Army was unable to complete an anticipated early transfer of the property to Clark County in 2003. However, the Army is continuing their efforts to clean the site to be protective of human health and the environment as required by the state cleanup law.

Contaminants of Concern

Beginning in 1995, the Army and its contractors conducted site investigations including archival research to identify releases or threatened releases of hazardous substances throughout the site. Ecology, in their enforcement order, summarized the findings of the investigations. They found the presence of:

- Diesel fuel, fuel oil, pesticides, and xylenes in the soil
- Volatile organic compounds, including 1,1,1-trichloroethane in the soil and ground water
- Military munitions used or disposed of at the site, including explosives, unexploded ordnance (UXO), munitions, and munitions fragments in the soil
- The constituents of those military munitions, including the explosive compound RDX (which is shorthand for Royal Demolition Explosive, sometimes referred to as Research

<u>Xylenes</u>: An industrial solvent and fuel additive

<u>Volatile organic compounds</u>: Organic solvents used for cleaning oil and grease from machine parts.

Unexploded Ordnance:

An explosive munition that was fired but did not detonate as intended. May be whole, in parts, or fragments.

<u>RDX:</u> An explosive compound used in military munitions.

<u>Perchlorate:</u> An oxidizer present in solid rocket fuel and fireworks.

¹⁰ Otak, Inc. 1998.

¹¹ URS, 2003.

¹² Clark County Public Works Website. http://www.co.clark.wa.us/public-works/campbonn/index.html

Demolition Explosive), in the soil and ground water. This includes the presence of the chemical perchlorate in the groundwater beneath Landfill 4.¹³

The Army and Ecology also considered input from the local community to ensure all exposure pathways would be evaluated. Issues of particular concern are ground water contamination, because of use of ground water as a source of potable water by residents near the site, and the presence of unexploded ordnance on site, which could present a serious public safety concern depending on future site use.

Status of Cleanup Actions

Camp Bonneville has been divided up into five remedial action units (RAU). These units are primarily grouped by the nature of the particular release, not by physical boundaries. The investigation at the units does include analysis for ground water contamination and is thus not limited to only soil contamination. The remedial action units were defined according to where specific cleanup-related actions will occur (see maps in Appendix E).

The following table (Table 1) summarizes the current status of each of the remedial action units as well as the upcoming public participation opportunities associated with the release of draft reports and plans:

¹³ State of Washington Department of Ecology Enforcement Order (No. 03TCPHQ-5286), February 2003, p. 4

Table 1: Current Status of Remedial Action Units and Public Involvement Opportunities				
Area	Known or Suspected Source of Contamination	Status	Public Participation Opportunities: Public notice will be provided for each comment period	For each public comment period, expected activities include:
Remedial Action Unit 1	20 former small waste sites <i>Releases of hazardous</i> <i>toxic waste</i>	Independent cleanup action completed prior to enforcement order; cleanup action plan documenting process will be submitted	Draft Cleanup Action Plan Public Notice April 2004	Notice in the site register Notice on Ecology's website
Remedial Action Unit 2A	21 former small arms range <i>Lead</i>	Soil investigation completed Remedial investigation and feasibility study report is being developed	Draft Remedial Investigation report Public Notice Unscheduled Draft Feasibility Study report Public Notice Unscheduled Interim Action Work Plan Public Notice Unscheduled Draft Cleanup Action Plan Public Notice Unscheduled	Notice mailed and emailed to the local area Notice placed in major local newspapers Comment summary and response letter mailed to commenters

Table 1: Current Status of Remedial Action Units and Public Involvement Opportunities				
Area	Known or Suspected Source of Contamination	Status	Public Participation Opportunities: Public notice will be provided for each comment period	For each public comment period, expected activities include:
Remedial Action Unit 2B	Demolition areas #2 and #3 crater <i>Munitions disposal,</i> <i>various explosive</i> <i>chemical contaminants</i>	Soil and groundwater investigations completed Monitoring wells installed Remedial investigation and feasibility study report is being developed	Draft Remedial Investigation report Public Notice Unscheduled Draft Feasibility Study report Public Notice Unscheduled Interim Action Work Plan Public Notice Unscheduled Draft Cleanup Action Plan Public Notice Unscheduled	 Notice in the site register Notice on Ecology's website Notice mailed and emailed to the local area Notice placed in major local newspapers Comment summary and response letter mailed to commenters
Remedial Action Unit 2C	Former landfill area 4 and demolition area 1 <i>Disposal of munitions</i> <i>and solid waste, various</i> <i>explosive chemical</i> <i>contaminants including</i> <i>RDX and perchlorate</i>	Initial investigations of soil and groundwater completed Contract in place for landfill excavation Plume delineation and hydrogeological investigation ongoing Work plan for landfill removal under development	Draft Remedial Investigation report Public Notice Unscheduled Draft Feasibility Study report Public Notice Unscheduled Interim Action Work Plan Public Notice April 2004 Draft Cleanup Action Plan Public Notice Unscheduled	

Table 1: Current Status of Remedial Action Units and Public Involvement Opportunities				
Area	Known or Suspected Source of Contamination	Status	Public Participation Opportunities: Public notice will be provided for each comment period	For each public comment period, expected activities include:
Remedial Action Unit 3	Area of site where munitions were used other than those specified in other units <i>Use or disposal of</i> <i>munitions</i>	 Performance of several remedial investigation activities including: Archives research of historical site use Limited field investigation followed by statistical characterization, field reconnaissance 	Draft Remedial Investigation report <i>Public Notice Unscheduled</i> Draft Feasibility Study report <i>Public Notice Unscheduled</i> Draft Cleanup Action Plan <i>Public Notice Unscheduled</i>	Notice in the site register Notice on Ecology's website Notice mailed and emailed to the local area Notice placed in major local newspapers Comment summary and response letter mailed to commenters

The Cleanup Process

Figure 1 (page 12) outlines the steps in the state's cleanup process and highlights the key opportunities for public comment. The general process is to investigate the site for contaminants, identify and select cleanup options, and conduct a cleanup. At any time during the cleanup process, an interim action (described in the next section) may be carried out. Issuance of a draft remedial investigation report, a draft feasibility study report, and a draft cleanup action plan, or an interim action work plan are activities for which a public notice and comment period of at least 30 days are conducted. The cleanup process is described in greater detail below and identifies opportunities for public involvement.

When public notice is required, the law states that at a minimum, the "potentially affected vicinity" must be notified by mail and an advertisement must be placed in the newspaper with the largest circulation in the community. Additionally, during any public comment period, by request of ten or more people, Ecology or the Army will hold a public meeting about the proposal that is undergoing public review. These requirements will be followed for each public comment opportunity. The law also allows for Ecology or the Army to go beyond the mandatory public involvement requirements if public interest and concern warrant such activities.

Interim Actions

During the cleanup process, generally outlined by Figure 1, interim actions may be conducted if required or approved by Ecology. An interim action is any action that partially addresses the cleanup of a site. An interim action may be implemented to address any of the following circumstances:

- It is technically necessary to reduce a threat to human health or the environment by eliminating or substantially reducing one or more pathways for exposure to a hazardous substance at a site.
- It corrects a problem that may become substantially worse or cost substantially more to address if the action is delayed.
- It is needed to provide for completion of a site hazard assessment, state remedial investigation/feasibility study, or design of a cleanup plan.

Ecology will hold a public comment period of at least 30 days on planned interim actions.¹⁴

Remedial Investigation/Feasibility Study Report

The goal of the remedial investigation is to determine what contaminants are on the site. The draft remedial investigation (RI) report provides baseline data about environmental conditions that will be used to develop cleanup options. The draft feasibility study (FS)

¹⁴ Public comment periods generally last 30 days but can be extended. Comment periods will be combined when appropriate.

report identifies the site cleanup alternatives based on data compiled during the remedial investigation. These studies may be conducted concurrently because data collected in the investigation influences the development of remedial alternatives in the feasibility study, which in turn affects the data needs and scope of any treatability studies or additional field investigations that may be required before cleanup can occur. This type of approach encourages the continual scoping of the site characterization effort, minimizing the collection of unnecessary data and maximizing data quality. In addition, these studies contain the information that enables the selection of a cleanup action. These reports may be combined into a draft RI/FS report. The draft RI/FS will be made available for public review and comment. Comments received during the comment period will be considered as the draft Cleanup Action Plan is prepared.

The remedial investigation and feasibility study process may include several phases:

- Scoping;
- Site characterization;
- Development and screening of alternatives for cleanup;
- Treatability investigations (if necessary to support decisions); and
- Detailed analysis.

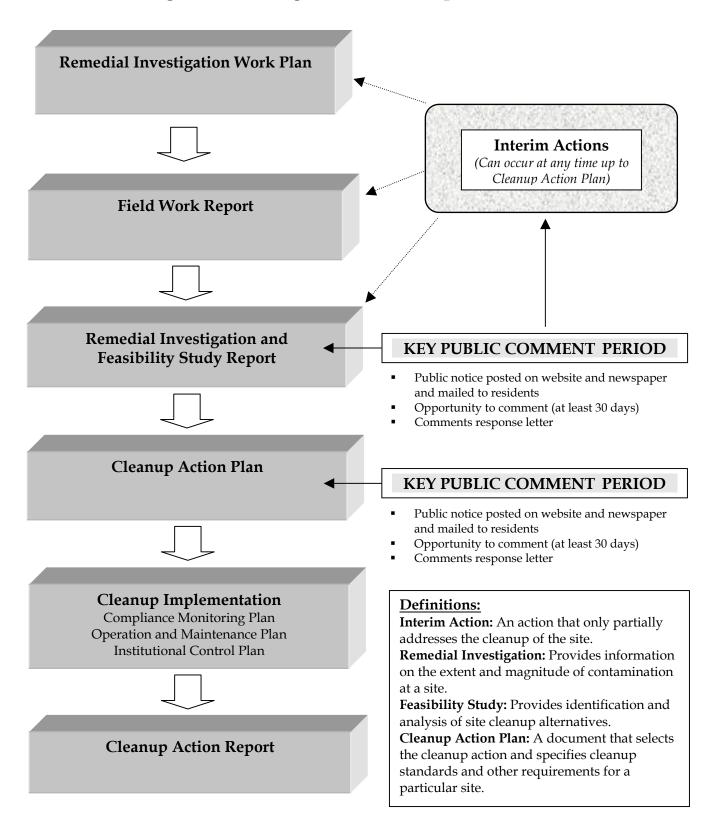
The Army submitted the draft RI/FS reports for remedial action units 2A, 2B, and 2C to Ecology in January 2004. Additional reports will be issued in the future, as indicated on Table 1. These investigations will provide the baseline data about the extent and magnitude of contamination at Camp Bonneville, which will help determine the cleanup action plan.

Cleanup Action Plan

After public comment is received on the draft RI and FS reports, preferred cleanup alternatives will be selected and a draft cleanup action plan will be written for each remedial action unit. This plan specifies the cleanup standards for a particular area, selects the preferred cleanup alternative and may provide for additional requirements. This plan also outlines the work to be performed during the actual site remediation. Cleanup Action Plans for specific areas of Camp Bonneville currently in progress or planned for the future are noted on Table 1. The draft cleanup action plan is submitted for public review and comment.

This is another critical opportunity for public input. Once comments are received and reviewed and any necessary changes are made, Ecology provides final approval and site cleanup can begin.

Figure 1: Washington State Cleanup Process



3.0 COMMUNITY PROFILE

Community Overview

Camp Bonneville is one of the largest parcels of undeveloped land in the county. The City of Vancouver is the nearest urban development while the nearest town is Proebstel, an unincorporated community about 2.5 miles to the southwest of the western entrance to Camp Bonneville.

The 2003 population of Clark County has 372,300 people situated within 628 square miles. Thirty-one percent of the jobs are in management, professional, and related occupations; twenty-seven percent in sales and office occupations; and seventeen percent in educational, health, and social services.¹⁵ A large percentage of the population commutes daily to Portland, Oregon, for employment.

The area surrounding Camp Bonneville has historically been sparsely populated with scattered residences and was used primarily for agriculture and livestock grazing. Since the county has experienced a high growth rate in the last several years, this area has also experienced an increase in development, primarily in country-manor styled homes.

Washington State Department of Natural Resources

In 1955, the U.S. Army leased 840 acres of property, in two separate parcels, from the State of Washington. Twenty acres were returned in 1957, but the rest is still being leased. This property is state trust land, and the Washington Department of Natural Resources is charged statutorily to manage it to generate revenue for the common school construction fund. However, with the Army's presence and their long history of use, the Department of Natural Resources has been unable to safely access the property and effectively manage it in the manner legally prescribed. The Department of Natural Resources would like to dispose of this property and are hopeful that it can be an eventual acquisition by Clark County.¹⁶

Clark County

The Clark County Board of Commissioners has been recognized as the local land reuse development authority since 1995. They were instrumental in forming the reuse planning committee, which developed the reuse plan based on the input of a broad spectrum of community members. Clark County has been an active stakeholder at Camp Bonneville. They have produced a site-specific website, produced and mailed newsletters to community members, participated in community meetings and have

¹⁵ Bureau of Economic Analysis, Bureau of Labor Statistics, National Agricultural Statistics Service, National Center for Health Statistics, U.S. Census Bureau, 2001.

¹⁶ As per email from Rich Scrivner, Planning Manager for Washington Department of Natural Resources Real Estate group. February 13, 2004.

attended most Restoration Advisory Board meetings. The county is still interested in acquiring the property and implementing the reuse plan.

Restoration Advisory Board

The Camp Bonneville Restoration Advisory Board was established in 1995 (by the Army) as a way to create an avenue for information exchange between community members and the Army about the Camp Bonneville cleanup.¹⁷ The Board is comprised of up to 25 members, selected by the Army. The meetings are chaired by the Army and are public meetings open to anyone interested in the cleanup of Camp Bonneville. Community members wishing to serve on the Board may apply for membership by contacting the Army's site manager or obtaining an application from the local information center (see page 19). The Camp Bonneville Restoration Advisory Board and the community members who have been present at meetings have used these regularly held meetings to ask questions and provide input to the Army. Ecology is also a frequent attendee at these meetings.

Community Interviews and Contacts

Representatives of various community and interest groups were interviewed prior to drafting the public participation plan to gather input for the development of this plan. Fifteen individuals or groups were interviewed to better understand current community concerns related to the cleanup, and to determine the best ways to support public involvement in the cleanup process. An interview outline was used to guide the interview process. The interviews were conducted informally with open-ended questions, and produced a great deal of useful information. The interview questions were based on the following topics:

- A description of the site, its regulatory status, and the role of public participation in the cleanup process
- Questions about the individuals' and the community's relationship to, and awareness, of the site
- Interests or concerns related to the site and its link with the larger community
- Specific questions about ways to reach people in the community with information, the types and content of needed information, and ways to share information (including need for special accommodations or printed material in another language)
- Specific questions about outreach formats, meeting locations, information centers, and other outreach options

The input received during the interviews was used to develop this public participation plan and to guide Ecology and the Army's public outreach activities. Key community

¹⁷ Restoration Advisory Boards can be formed when a military installation closes as part of the Base Realignment and Closure Program. It was the intention of the Department of Defense that these boards would improve the cleanup process by increasing community understanding and support for cleanup efforts, improving government decisions, and ensuring cleanups are responsive to community needs.

concerns are summarized below. Additional details from the interviews conducted are included in Appendix A of this plan.

Key Community Concerns

Key community concerns raised during the interviews related to ground water and unexploded ordnance. Ecology and the Army have been made aware of the issues and concerns mentioned by the community through the interviews. They will address the concerns through a variety of activities such as providing information in reports and in fact sheets. In addition, this public participation plan outlines how residents will continue to be involved in the cleanup process.

General community concerns related to Camp Bonneville are summarized below:

Environment

Most people interviewed feel that protection of the environment is important. Included within that, is a desire to preserve the habitat for wildlife. Even though they would not like for the area to be logged (and conveyed concern for the possible danger to a logger from unexploded ordnance), there is some unease about the potential of forest fire. In addition, there was recognition of this area as a watershed, which led to concern regarding how the creek is being affected by contamination.



Public Health and Safety

In general, people are unsure about the risks to their own health that may be posed by the site. They seemed to know that there are unexploded ordnance, but are unsure of how much is there, what the dangers are and in some cases, what an unexploded ordnance is. There was also concern about the safety of the water, whether for drinking water use or as it enters Lacamas Lake, where fishing and recreation are a popular activity. Additionally, they wondered what the Army would do if a problem was discovered later (i.e. would they come back and cleanup?).

Water Supply

When asked about primary concerns at Camp Bonneville, the drinking water supply was often mentioned. Those interviewed believe that the extent of ground water contamination was not known, nor the effects. Concern was expressed regarding the City of Vancouver's water supply wells, since the city relies on ground water and the wells are located south of the camp. Others were worried about their own wells and whether the water was safe to drink. In one case, one woman stopped using her well a while ago because "she heard it was not safe" but did not know any specifics. The community made it clear that the question of water contamination needs further explanation and clarification.

Public Involvement

Comments regarding public involvement ranged from general to specific. Some were unsure why they should be involved and if involved, how their comments would be used. Others felt that when information is provided it should be understandable, but should also deal with the issues at hand in such a way that people know how the information impacts them. Definitions or explanations of terms, such as unexploded ordnance and acceptable risk, could be helpful. In addition, there were some suggestions that were more specific. Some thought another site tour would enable interested individuals to actually see what was being discussed. Others thought the Restoration Advisory Board should be eliminated so the community could have a collective fresh start as the cleanup process begins. In general, the community appreciates receiving information on the activities at Camp Bonneville.

4.0 PUBLIC PARTICIPATION STRATEGY

This section describes the objectives and desired outcomes of public participation for the Camp Bonneville site and summarizes the overall strategy for public participation. The activities will be coordinated with the release of the studies and plans outlined in Table 1.

4.1 Objectives and Outcomes

This public participation strategy is designed to accomplish the following goals:

- Help the public understand the issues at Camp Bonneville
- Inform the public about opportunities for input
- Solicit input to the draft cleanup studies and draft action plans
- Provide feedback to the public about how decisions are made and how their input is incorporated

The outcomes of a successful public involvement process will include an increase in:

- Awareness in the community about plans for cleanup at Camp Bonneville and opportunity for public involvement
- Public participation throughout the cleanup
- Community understanding regarding how their input will be considered in the decision-making process

The success of the above objectives and outcomes can be measured, at least in part, in the following ways:

- Number of comments submitted via e-mail, mail, comment form, or other method
- Direct feedback about the process
- Periodic updates to the plan to reflect community responses and needs

4.2 Public Participation Strategy

The overall strategy of this public participation plan is designed to improve the value and quality of public involvement opportunities during the cleanup of Camp Bonneville. There are four general parts to the public participation strategy at this site which include:

- identify effective ways of conducting public notice;
- provide information to the public about the site;
- provide notice concerning events and comment periods; and
- other ongoing activities

Activities to identify the most effective ways to conduct public notice have already occurred and are summarized in this section. This included stakeholder interviews that were conducted before the development of this plan. These interviews provided key insights into local community concerns and provided suggestions for potential communication channels. The other parts of the public participation strategy are ongoing, and are also described in this section. Site information will be made available by a variety of means to accommodate easy access by community members. Public notices will be published in a timely manner in order to provide ample opportunity for the public to comment on draft plans. And finally, activities will continue as needed to reflect community interests and the objectives of public participation.

4.2.1 Determine Effective Ways to Conduct Public Notice

Stakeholder interviews

In order to determine the most effective way to conduct public notice and outreach activities, stakeholder interviews were conducted. A list of potentially interested community members was identified including county officials, Restoration Advisory Board members, neighbors, businesses, school representatives and environmental groups.

The interviewees provided feedback on public involvement efforts to date, information on potential meeting locations and times, and effectiveness of communication tools such as mailings and websites. In addition, the stakeholder's issues and concerns, related to Camp Bonneville, were also expressed. These interviews provided a great deal of insight and have assisted in developing the overall strategy and approach for this public participation plan.

Restoration Advisory Board meeting

In addition to the stakeholder interviews, a meeting of the Restoration Advisory Board (RAB) was attended. The purpose was to solicit suggestions for the public participation plan and outreach activities.

The meeting provided an opportunity to understand previous communication efforts and results of those efforts. This information was also used to develop the overall public involvement strategy provided for in this plan.

4.2.2 Provide Information About Camp Bonneville to the Public

The interviews highlighted the desire of the community for information. In order to assist in an understanding of the issues at Camp Bonneville, it is important that accurate, current information be made accessible through various means. Several sources of information have been developed for public access, which are described in this section.

Information Centers (also called Information Repositories)

Information centers provide local access to a comprehensive collection of site related documents. Complete site files for the Camp Bonneville site investigation and cleanup activities are kept at several locations and are available for public examination. During public comment periods, the information center is updated to include the relevant documents for review. Documents remain at the information centers for the

duration of the investigation and cleanup. For the Camp Bonneville site, the information centers are:

Westfield Shoppingtown Public Library

8700 NE Vancouver Mall Drive, Suite 285 Vancouver, WA (360) 892-8256

US Army Corps of Engineers

4735 E. Marginal Way South Seattle, WA (206) 764-6704

Fort Lewis Public Works

2012 Liggett Avenue, Room 311 Fort Lewis, WA (253) 966-1771

Washington State Department of Ecology

Toxics Cleanup Program 300 Desmond Drive Lacey, WA (360) 407-7224 (by appointment)

Websites

Several community members suggested websites as good communication tools. This format supports access to information for individuals who want to learn about the cleanup without attending public meetings. Community members wanting to obtain information about Camp Bonneville in a convenient manner can have online access to draft reports and cleanup plans related to specific public comment periods. Visitors to websites can download, print, and read information and can also submit comments via e-mail.

Ecology will maintain a webpage about the Camp Bonneville cleanup site in order to support this avenue of communication. The website will include information such as a notice of public comment periods, public forums and meetings, and informational materials. It can be accessed through the following address:

http://www.ecy.wa.gov/programs/tcp/sites/camp_bonneville/camp_bonneville_hp.htm

Other websites that have contained information on Camp Bonneville in the past include:

- Clark County: http://www.clark.wa.gov/public-works/campbonn/
- U.S. EPA Region 10: http://yosemite.epa.gov/r10/cleanup.nsf/sites/CB

 U.S. Army BRAC Office: http://www.hqda.army.mil/acsimweb/brac/braco.htm

Public Forums/Restoration Advisory Board Meetings

Meetings, open houses or other local events will be held when required or appropriate to provide a forum for the interested public to learn about a proposed action or to provide comments to Ecology and the Army. These meetings offer an opportunity to increase the awareness and knowledge about Camp Bonneville and the planned cleanup activities, as well as provide an opportunity for interaction between the community and those responsible for cleaning up the site.

An open house meeting will be held during the public comment period for the cleanup action plan for remedial action unit 1 and the interim action work plan for remedial action unit 2C. General site information and an overview of upcoming activities will be available at this event. In the future, a site tour, open house or additional public meetings may be held to provide information about draft reports or cleanup plans based on public concern or interest expressed.

Restoration Advisory Board meetings occur regularly and provide another avenue to learn about the site. Individuals or groups are welcome to attend these meetings and are invited to ask questions or provide input to the Army. Information regarding upcoming RAB meetings can be obtained by contacting the Army (see Appendix D).

Factsheets

Interviews conducted prior to the development of the public participation plan indicated a need for general information regarding current knowledge about Camp Bonneville. In April 2004, a factsheet will be prepared and mailed to community members which will describe the site, the contamination that has been found, where contamination has been found, and outline upcoming public involvement activities. This factsheet will increase the awareness of public events as well as provide contact information and web addresses. Future factsheets will be prepared as needed.

4.2.3 Provide Public Notice for Events and Comment Periods

Once the community is provided sufficient information regarding Camp Bonneville, they will feel better prepared to provide comment during comment periods. The Washington State cleanup law requires that public comment period notices be mailed to the local area (including local businesses and residents) as well as to others who have indicated interest in receiving Camp Bonneville materials. In order to effectively provide an opportunity where interested community members can contribute meaningful comments, public notices will be posted via a variety of sources and are described in this section of the plan.

Model Toxics Control Act (MTCA) Site Register

Ecology produces an electronic newsletter called the MTCA Site Register. This semimonthly electronic publication provides updates of the cleanup activities occurring throughout the state. The most current information regarding public meetings, public comment periods, and cleanup-related reports is produced in this newsletter (for all sites in Washington, not solely Camp Bonneville). Individuals who would like to receive the MTCA Site Register can sign-up three ways:

- Call (360) 407-7245
- Send an email request to tfis461@ecy.wa.gov or
- Register on-line at http://www.ecy.wa.gov/programs/tcp/pub_inv/pub_inv2.html

Local News Releases and Notices

Another tool that can be used to provide timely information regarding upcoming public comment periods can be news releases, sent to local newspapers. Community members acknowledged in the interviews that newspapers are often referenced as a source of information. Public comment notices or news releases will be sent to the Oregonian (Clark County section), the Columbian, and the Reflector. In addition, newspaper ads will be purchased in order to announce public meetings held during public comment periods.

Direct mail and e-mail announcements

Throughout the cleanup process, both an e-mail and direct mail distribution list will be maintained. The list will be created from previous lists as well as carrier route delineations with additions occurring through the website or public forums. Information materials using various formats such as postcards or fact sheets will be used to notify the public about upcoming site activities and to announce public comment periods. Several community members had indicated that their knowledge of the site was achieved through direct mailing of information. This strategy for public involvement will be maintained.

4.2.4 Ongoing Activities

In order to successfully achieve the objectives and outcomes of public participation, regular adjustments will occur. Public comments received will be consolidated and summarized in a letter, which will indicate how input was used to modify a given document. In addition, periodic updates to the public participation plan will reflect changing community interests and needs. Sustaining these activities will ensure that Ecology and the Army not only understand the public's interests and concerns but are responsive to the community's input. This will ensure that the goal of an open dialogue is maintained throughout the cleanup process.

GLOSSARY

Cleanup: The implementation of a cleanup action or interim action.

Cleanup Action: Any remedial action except interim actions, taken at a site to eliminate, render less toxic, stabilize, contain, immobilize, isolate, treat, destroy, or remove a hazardous substance that complies with cleanup levels; utilizes permanent solutions to the maximum extent practicable; and includes adequate monitoring to ensure the effectiveness of the cleanup action.

Cleanup Action Plan: A document that selects the cleanup action and specifies cleanup standards and other requirements for a particular site. The cleanup action plan, which follows the remedial investigation/feasibility study report, is subject to a public comment period. After completion of a comment period on the cleanup action plan, Ecology finalizes the cleanup action plan.

Cleanup Process: The process for identifying, investigating, and cleaning up hazardous waste sites.

Contaminant: Any hazardous substance that does not occur naturally or occurs at greater than natural background levels.

Enforcement Order: An order that is issued by the Director of Ecology which requires potentially liable persons to provide for remedial actions with respect to any release, or threatened release, for which Ecology does not conduct or contract for conducting remedial action and for which the department believes remedial action is in the public interest. (Ch. 70.105D RCW)

Feasibility Study: Provides identification and analysis of site cleanup alternatives and is usually completed within a year. The entire Remedial Investigation/Feasibility Study process takes about two years and is followed by the cleanup action plan. Remedial action evaluating sufficient site information to enable the selection of a cleanup action plan.

Ground water: Water found beneath the earth's surface that fills pores between materials such as sand, soil, or gravel. In aquifers, ground water occurs in sufficient quantities that it can be used for drinking water, irrigation, and other purposes.

Hazardous Site List: A list of ranked sites that require further remedial action. These sites are published in the Site Register.

Interim Action: Any remedial action that partially addresses the cleanup of a site. It is an action that is technically necessary to reduce a threat to human health or the environment by eliminating or substantially reducing one or more pathways for exposure to a hazardous substance at a facility; an action that corrects a problem that may become substantially worse or cost substantially more to address if the action is delayed; an action needed to provide for completion of a site hazard assessment, state remedial investigation/feasibility study, or design of a cleanup action.

Model Toxics Control Act: Refers to RCW 70.105D. Voters approved it in November 1988. The implementing regulation is WAC 173-340 and was amended in 2001.

Monitoring Wells: Special wells drilled at specific locations on or off a hazardous waste site where ground water can be sampled at selected depths and studied to determine the direction of ground water flow and the types and amounts of contaminants present.

Public Notice: At a minimum, adequate notice mailed to all persons who have made a timely request of Ecology and to persons residing in the potentially affected vicinity of the proposed action; mailed to appropriate news media; published in the local (city or county) newspaper of largest circulation; and the opportunity for interested persons to comment.

Public Participation Plan: A plan prepared under the authority of WAC 173-340-600 to encourage coordinated and effective public involvement tailored to the public's needs at a particular site.

Release: Any intentional or unintentional entry of any hazardous substance into the environment, including, but not limited to, the abandonment or disposal of containers of hazardous substances.

Remedial Action: Any action to identify, eliminate, or minimize any threat posed by hazardous substances to human health or the environment, including any investigative and monitoring activities of any release or threatened release of a hazardous substance, and any health assessments or health effects studies conducted in order to determine the risk or potential risk to human health.

Remedial Investigation: Any remedial action that provides information on the extent and magnitude of contamination at a site. This usually takes 12 to 18 months and is followed by the feasibility study. The purpose of the Remedial Investigation/Feasibility Study is to collect and develop sufficient site information to enable the selection of a cleanup action.

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Otak, Inc. *Camp Bonneville Draft Reuse Plan.* Prepared for the Camp Bonneville Local Redevelopment Authority (LRA), September 1998.

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Washington State Department of Ecology, *Enforcement Order No. 03TCPHQ-5286,* February 2003.

Washington State Department of Ecology, *Model Toxics Control Act Regulations, WAC* 173-340-600, *Public Notice and Participation,* February 2001.

Washington State Department of Ecology, *Model Toxics Control Act Regulations, WAC* 173-340, February 2001.

Washington State Office of Financial Management, 2003 Population Trends for Washington State.

APPENDIX

Appendix A

Summary of Community Interviews

Interview Participants

Representatives of the following categories of people were interviewed:

- Clark County Commissioner
- Clark County Public Information and Outreach Representatives
- Washington State Department of Natural Resources Representative
- Neighborhood Association
- Business Owners
- Vancouver Audubon Society
- Neighborhood Residents
- Evergreen School District
- Current and Previous Restoration Advisory Board Members

Issues, Concerns and Suggestions

Interviews were conducted to gather information that would help in developing a public participation plan that reflects the communities' public involvement preferences. In general, most interviewees appreciated having the opportunity to express some of their concerns. The following is a characterization of comments and suggestions received during the interview process.

Environmental Concerns

In general, there is some confusion among the public as to what are the environmental conditions at Camp Bonneville. The questions raised by the interviewees can be categorized as 1.) nature of the spills 2.) extent of the contamination and 3.) actual hazards at the site. Some wonder if there are toxic dumpsites and if so, whether they are polluting the creek. Others have concerns for the wildlife at the site and whether the wildlife habitat is being (or will be) destroyed.

Some concerns revolve around how future plans would affect the environment. Washington Department of Natural Resources has been unable in the past to manage their property due to contamination on site including potentially hazardous work conditions because of shrapnel left in trees. Future planning should involve representatives from this agency. Forest management is a concern. Though most people would not like to see the area logged, there is some concern about the potential for forest fire, since the forest has not been actively managed. Because of the uncertainty of the future plans at Camp Bonneville, the community would like to know how that affects the cleanup, especially with respect to unexploded ordnance and the risks associated with their presence. With regards to the Army's role in cleanup, some believe they are doing a good job and have stopped further contamination from occurring while others believe that their investigation has not been thorough. It was clear, from the interviews, that there would be a great deal of dissatisfaction in the community if the Army does not cleanup the site or only takes care of part of the problem.

Health Concerns

The health concerns revolve around water quality and danger associated with unexploded ordnance. Again, there is a great deal of uncertainty. Regarding the safety of the water, some are aware of the contaminants in the plume near the landfill, but wonder if that plume is migrating and how that impacts ground water both for private and municipal drinking water wells. Some community members would like to have clarification as to whether the ground water has been tested for other contaminants that may be present, for example lead or chemicals associated with the degradation of ordnance. Further downstream from the site, the water quality at Lacamas Lake was questioned since it is fed by Lacamas Creek. Many in the community use the lake for recreation and fishing. Should they be warned about possible health concerns?

Concern about unexploded ordnance in general was often mentioned by community members. There are concerns with respect to the health and safety of wildlife, neighbors and even property trespassers. One suggestion was to place a sign at the gate entrance to inform passers-by about the site cleanup and who to contact for more information. Other people, however, feel that the site is safer than some make it out to seem and are not particularly worried about the perceived danger of unexploded ordnance. One individual, who has been with the school district for decades, remarked that the district used the site for twenty-two years; leading kids up the hills and through the meadows without any incident.

Economic Concerns

The few references to economic concerns were all of a variable nature. One individual was worried that there is not enough money to do adequate cleanup. Others had concerns related to post-cleanup such as the potential of logging or overdevelopment for economic gain, which they feel would not be in the best interest of the habitat or wildlife. And others were concerned that the marketability of the timber (from state-owned lands) might be low due to the previous site contamination or safety concerns.

Public Participation Comments and Concerns

The interviews indicated that nearby residents are the individuals currently most interested in activities at Camp Bonneville, though their level of interest varies. Some feel that there are imminent dangers at the site that everyone should be made aware of while others are not as worried and just want to know when cleanup is done. The larger community seems to be not as concerned.

Many individuals were most vocal about the future use of the site. There was some concern about a re-use plan coming into effect that was created before thorough site investigation was completed. Other comments revolved around who would be using

the area. The school district would like to use the site again, as they have done in the past. The Saddle Club and Audubon Society also are interested in the future use. Many still believe that a regional park would be the best use of the site.

Other community members expressed that they would be content if the site was closed to the public indefinitely or remote areas could be left inaccessible with signs warning intruders of dangers. Some have the perception that the county heavily focuses on developing parks, yet personally believe that some areas in the county should be left in their natural state.

Some residents commented on Ecology's role at Camp Bonneville expressed a desire to receive understandable data that clearly describes the acceptable risk levels so that they can be adequately informed. They are looking forward to Ecology guiding the Army in the cleanup process. The community is ready to instill confidence in Ecology's role to present accurate information and deal with the issues at hand.

Many community members commented that there is room to improve public involvement. One benefit that was identified is that an increase in available information would help alleviate some of the rumors that circulate in the neighborhoods. It was stated that in general, people will respond if they feel that the problem or issue impacts them. There were mixed feelings about the usefulness of open house meetings. Some believe that only a core group of people go to these meetings. Some suggested targeting outreach to additional groups in order to involve a wider audience such as: Local Sierra Club (Linda McLean); Friends of Clark County; Garry Lucas – Sheriff; Don Bivins – Vancouver Fire; Sam Kim – Greater Brush Prairie Neighborhood Association; Elementary school PTA groups; Audubon; Trout Unlimited; League of Women Voters. They suggested attending meetings of some of these already established groups or submitting information or notices to these groups to include in their newsletters or their e-mail lists. Neighborhood groups are important groups to keep informed (and have their own mailing lists).

Community members receive information from a variety of sources, though the region tends to be dominated by Portland area media. Many people receive their daily news from the newspaper with The Oregonian (which has a Clark County Section) being the most frequently read newspaper. The Columbian is also read as well as the Reflector, which is produced in Battle Ground and is free. The community calendars from these newspapers are places where meetings can be posted. In addition, local libraries have bulletin boards as does the Brush Prairie General Store.

Suggestions Made by Interviewees

Even though the newspaper was frequently acknowledged as a way to receive information about the community, different strategies were also suggested. Websites and e-mail tend to be good avenues of communication because many people stay home, once they arrive at home. In addition, having a comment form on a website is a convenient way for individuals to submit their comments. A fact/information sheet has been helpful in the past and would be useful to educate residents again. One individual suggested mailing a survey to the neighbors which would describe the problem, would identify the contaminants, and would compare the values to established threshold levels (or national acceptable 'risk' levels). An envelope should be included so that questions could be easily sent to the Army. There was also an expressed interest in information related to unexploded ordnance since residents do not know how much unexploded ordnance exists, what cleanup will be done and in many cases, what it is exactly. (One individual commented that Greg Johnson from Ecology did a very good presentation previously on unexploded ordnance.) When cleanup does occur, they would like to see an accounting of the amount of contamination removed from the site compared to the amount estimated to have been present prior to cleanup. All information should be presented in understandable language.

There were mixed messages with regards to meetings. As stated earlier, many feel that only a core group of people attend meetings. Some interviewees felt that the community as a whole has not been allowed to express their opinions because of the dominance of the Restoration Advisory Board and suggested that the Board be terminated. A site tour was suggested as a way to increase interest in the site and dispel some of the myths associated with Camp Bonneville. And if evening meetings are held, it was suggested that they begin at 4:30 or 5:00 pm, so people can stop by before they get home.

Meeting location suggestions included local schools, the library, Clark Public Utilities, the Water Resources Center, fire departments and local churches.

In general, interviewees were optimistic that the Army was exploring ways to open avenues of communication, which they felt would allow for the community to gain trust.

Appendix B

Potentially Interested Groups

The following list represents a sampling of the officials and organizations that will be contacted and informed of public involvement activities associated with the cleanup at Camp Bonneville. The list will continue to grow as additional interested groups and stakeholders are identified.

Elected Officials

Congressman Brian Baird Clark County Commissioners

City and County Government

Clark County Public Works Clark County Public Information and Outreach City of Vancouver City of Camas City of Battle Ground

State Agencies

Washington State Department of Natural Resources

Tribal Government Cowlitz Tribe

Neighborhood Associations

Heritage Neighborhood Lacamas-Matney Neighborhood Neighborhood Associations Council of Clark County

Schools

Frontier Middle School Pioneer Elementary School

Churches

Fourth Plain Church of the Nazarene Summit View Church

Local Interested Groups

Vancouver Audubon Society Sierra Club Loo Wit Group Clark County Trout Unlimited League of Women Voters Clark County Saddle Club

Appendix C

Key Newspapers

<u>The Columbian</u> P.O. Box 180 Vancouver, WA 98666-0190 360-699-6044 x3421 Fax: 360-737-3421 E-mail: patty.campbell@columbian.com <u>www.columbian.com</u>

<u>The Oregonian – Clark County Section</u> 1320 S.W. Broadway Portland, OR 97201 503-221-8334 E-mail: ads@adservice.oregonian.com www.oregonian.com

<u>The Reflector</u> P.O. Box 2020 Battle Ground, WA 98604 360-687-5151 E-mail: staff@thereflector.com www.thereflector.com

Appendix D

Contacts

Primary Contact

Ecology Project Coordinator Ben Forson Toxics Cleanup Program P.O. Box 47600 Olympia, WA 98504-7600 Phone: 360-407-7227 E-mail: <u>bfor461@ecy.wa.gov</u>

Backup Contact

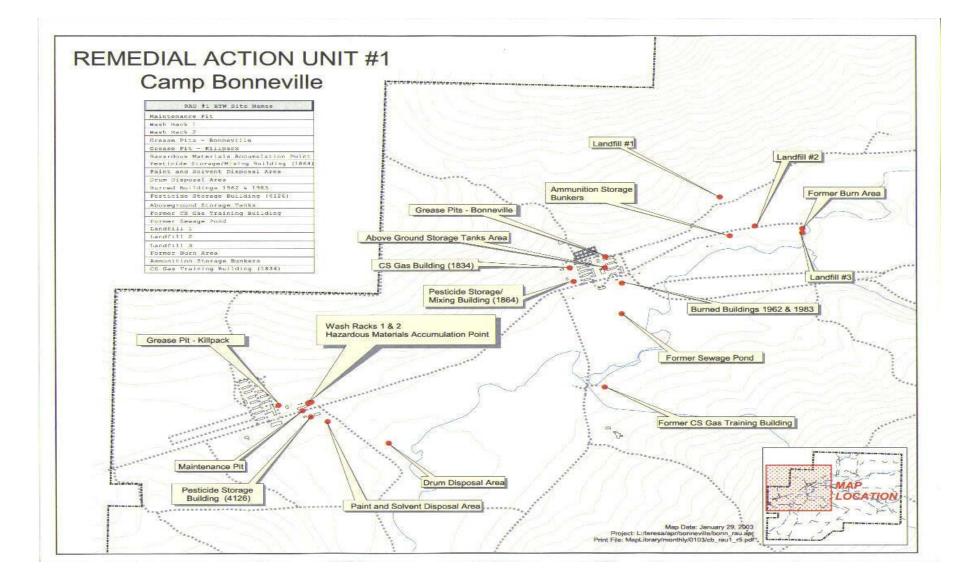
Ecology Public Involvement Coordinator Dawn Hooper Toxics Cleanup Program P.O. Box 47600 Olympia, WA 98504-7600 Phone: 360-407-7182 E-mail: <u>dhoo461@ecy.wa.gov</u>

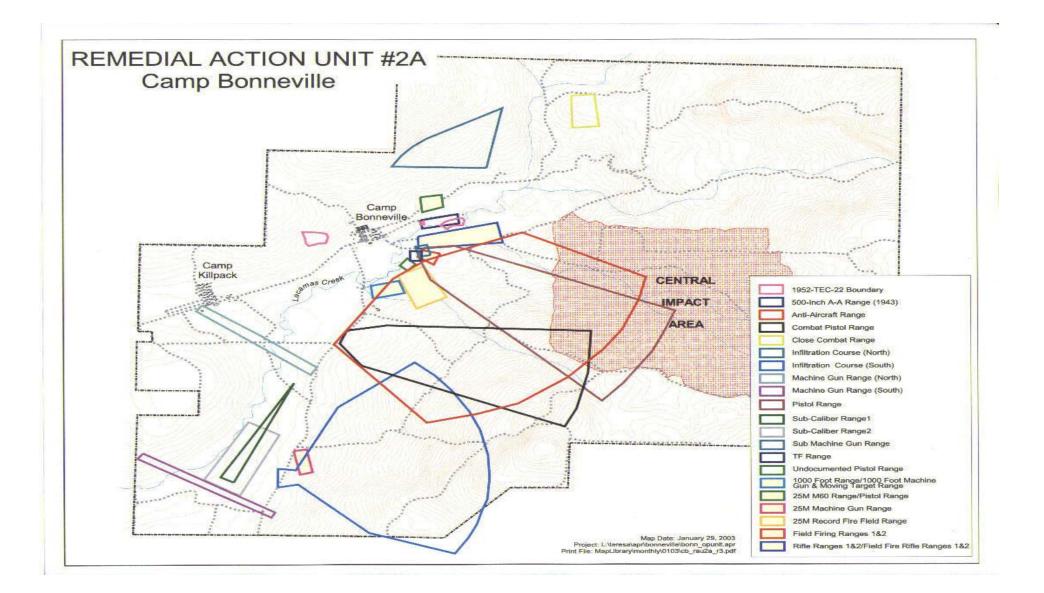
Army Project Coordinator Eric Waehling Public Works; AFZH-PWE (MS-17) P.O. Box 339500 Fort Lewis, WA 98433-9500 Phone: 253-966-1732 E-mail: <u>waehline@lewis.army.mil</u>

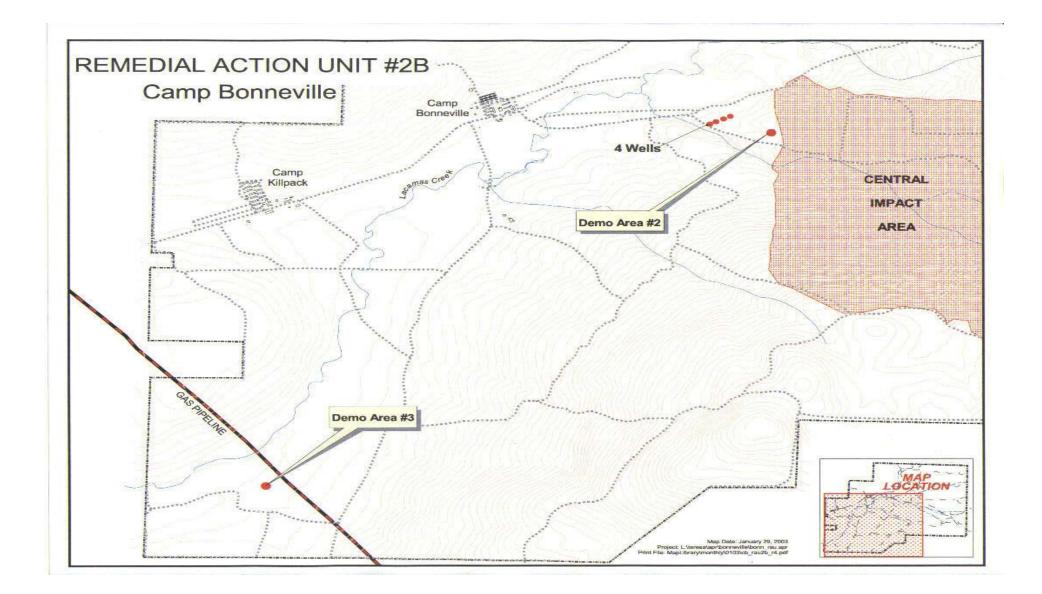
Public Participation Julie Wilson EnviroIssues P.O. Box 1101 Tualatin, OR 97062 Phone: 503-692-3788 E-mail: jwilson@enviroissues.com Public Participation Marlies Wierenga EnviroIssues 101 Stewart Street, Suite 1101 Seattle, WA 98101 Phone: 206-269-5041 E-mail: <u>mwierenga@enviroissues.com</u>

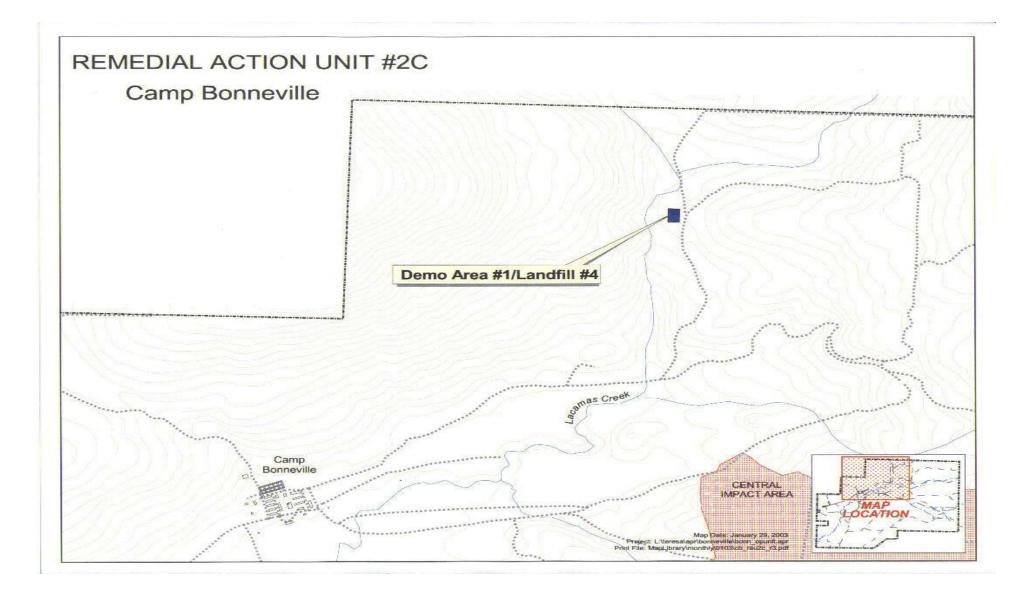
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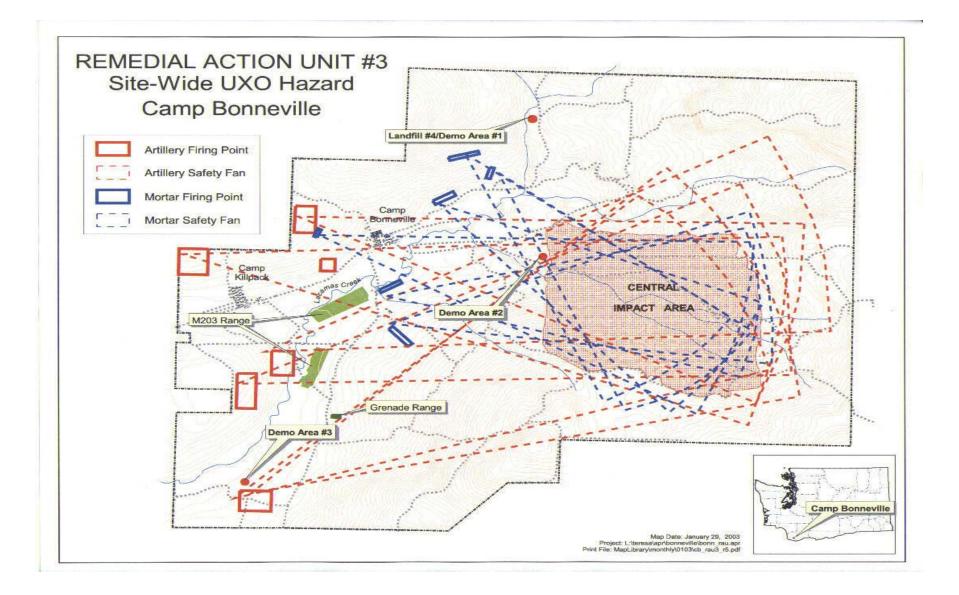
Table 2: General Schedule for Public Comment Opportunities			
Remedial	Document Deliverable	Submittal	
Action			
Unit			
1	Cleanup Action Plan	Within 30 days of the effective date of the Order	
2A	Interim Action Work Plan	Within 60 days of the effective date of the Order	
2A	Remedial Investigation and Feasibility Study	Within 5 months of the issue date of the Field Work Report	
2A	Cleanup Action Plan	Within 60 days of the issue of the remedial investigation and feasibility report	
2B	Remedial Investigation and Feasibility Study	Within 5 months of the issue date of the Field Work Report	
2B	Cleanup Action Plan	Within 60 days of the issue of the remedial investigation and feasibility report	
2C	Interim Action Work Plan	Within 60 days of the effective date of the Order	
2C	Remedial Investigation and Feasibility Study	Within 5 months of the issue date of the Field Work Report	
2C	Cleanup Action Plan	Within 60 days of the issue of the remedial investigation and feasibility report	
3	Remedial Investigation and Feasibility Study	Within 5 months of the issue date of the Field Work Report	
3	Cleanup Action Plan	Within 60 days of the issue of the remedial investigation and feasibility report	

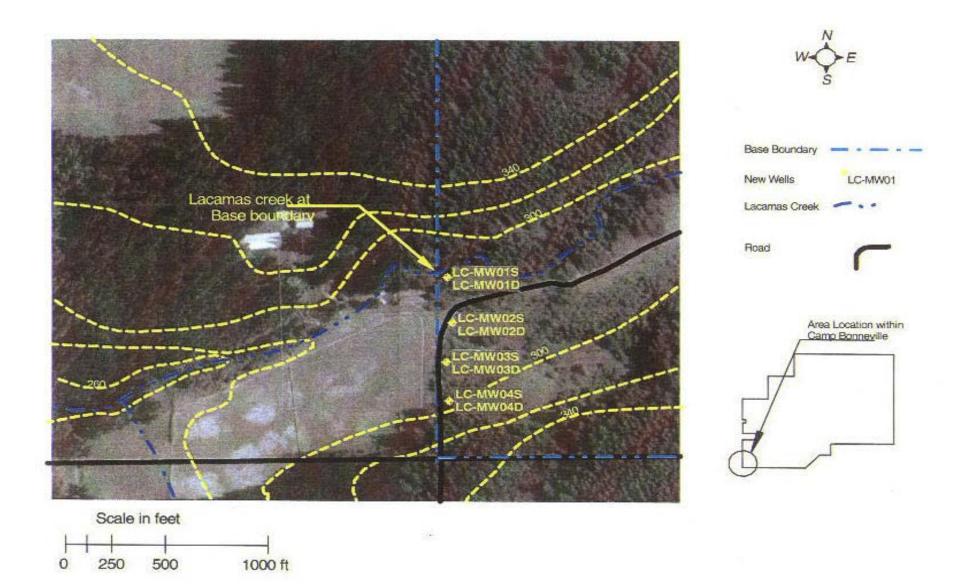












Appendix F

Maps

