



DEPARTMENT OF
ECOLOGY
State of Washington

Summary Response to Public Comments

*Proposed Changes to Cleanup Action Plans
RAU 3, Western Slopes Area*

Camp Bonneville Military Reservation - Clark County, WA

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Publication and Contact Information

This report is available on the Department of Ecology's website at <https://fortress.wa.gov/ecy/gsp/Sitepage.aspx?csid:11670>

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Camp Bonneville Cleanup Site

Site Background and Cleanup Status

Background

The Camp Bonneville Military Reservation Site (Camp Bonneville) is approximately 4,000 acres in size. Over half of the site is forested land (see Figures 1 and 2).

The Department of Defense (Army) owned and operated Camp Bonneville for firing range practice and training from 1910 to 1995. The camp was officially closed in 1995. Since then, investigations have been ongoing to characterize the contamination from the ammunitions and other hazardous substances, clean up the Site, and to develop a plan for re-using the Site once cleanup is complete. Contaminants identified at the Site include: unexploded ordnance, explosive compounds, lead, petroleum products, pesticides and volatile organic compounds in the soil, and perchlorate and explosive chemicals in the groundwater.

Cleanup Status

Several cleanup reports and documents guide cleanup activities at the Site, and those documents can be found on the Washington Department of Ecology's (Ecology) Camp Bonneville website:

<https://fortress.wa.gov/ecy/gsp/Sitepage.aspx?csid=11670>

Cleanup activities at Camp Bonneville have been ongoing since 1995. For cleanup purposes, Camp Bonneville has been divided into five remedial action units (RAUs). These units are primarily grouped by the nature of the particular release, not by physical locations. Cleanup status at each of the RAUs is described below.

Unit	Nature of Contamination	Current Status of Cleanup
RAU 1	Various locations throughout the site with releases of hazardous toxic waste.	RAU 1 covered 20 small "conventional" chemical contamination sites. Sites underwent confirmational sampling of the Army's cleanup efforts and closeout. RAU 1 cleanup is completed. A no further action determination was issued on January 2008.

RAU 2A	The small arms ranges where military munitions were used.	RAU 2A has undergone cleanup of 21 small arms ranges, including removal of 678 tons of lead-contaminated soil. Excavation of this area is complete, except for portions of ranges RAU 2A-16 and 21. The Cleanup Action Plan (CAP) was amended in 2017 to complete cleanup at ranges RAU 2A-16 and 21. RAU 2A cleanup is completed.
RAU 2B	Demolition Areas 2 and 3 where military munitions were disposed.	RAU 2B covered Demolition Areas 2 and 3. These demolition areas were both a potential munitions and chemical contamination concern. RAU 2B cleanup and confirmational sampling have been completed. A no further action determination was issued on March 2009.
RAU 2C	Demolition Area 1/Landfill 4 where military munitions and solid waste were disposed.	<p>Demolition Area 1/Landfill 4 was excavated and contaminated soils and munitions removed. Residual contaminated soil remains in place. Groundwater investigations and monitoring continues. A remedial investigation/feasibility study (RI/FS) is being drafted and will be provided for public review.</p> <p>Surface water and groundwater monitoring at Demolition Area 1/Landfill 4 continues to ensure that all potential sources of contamination are identified and characterized, and that public drinking wells and surface water are not harmed.</p>

<p>RAU 3</p>	<p>Addresses all munitions, unexploded ordnance, and munitions fragments throughout the site.</p>	<p>Extensive munitions cleanup has occurred within RAU 3 (More information is available on the site webpage at: https://fortress.wa.gov/ecy/gsp/Sitepage.aspx?csid=2216.)</p> <p>Cleanup of RAU 3 has been divided into four phases:</p> <ul style="list-style-type: none"> • Phase 1: Munitions of explosive concern (MEC) sub-surface clearance to a depth of 14 inches on the Central Valley Floor, associated wetlands and Environmental Study Area. Completed 2017. • Phase 2: MEC surface clearance of Demolition Areas 1 and 2. Cleanup completed 2017. • Phase 3: Following removal of fifteen hard targets from the Central Impact Target Area (CITA), cleanup included subsurface clearance of firing points, surface clearance of the CITA, and fencing of the CITA expansion area. The CAP was amended October 2017 after public review to include surface-only MEC removal of 100 acres. This cleanup is completed. Fencing of the CITA expansion area will begin in 2019. Regular inspections of the cleared area within the CITA will continue in perpetuity. • Phase 4: MEC surface clearance of the Western Slopes Area (WSA). The CAP was amended in March 2019 to initiate surface clearance in a 194-acre area with a slope of less than 25 percent. This area will be expanded as necessary following the step-out clearance process as described in the CAP.
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What’s next?

Cleanup work at Camp Bonneville will continue at several sites. In the next two years, expected activities include:

- Fencing of the CITA expansion area (RAU 3, Phase 3).
- The cleanup of the Western Slopes Area (RAU 3, Phase 4).
- A draft RI/FS report and draft CAP to address groundwater contamination at RAU 2C.
- Continued monitoring activities throughout the site to ensure the protectiveness of the cleanups.

Proposed Cleanup

Cleanup actions at the site are guided by the 2012 Amended Prospective Purchase Consent Decree, including the CAP for RAU 3 (also termed Site-wide Munitions). In 2018, the public was invited to provide comments on a proposed change to the CAP for the WSA portion of RAU 3 (see Figure 3 for the map). The proposed change to the WSA cleanup includes the following:

1. As amended: Vegetation removal and surface MEC clearance of all areas with a slope of less than 25 percent, which is based on new information including a recent 2017 pilot test and access limitations of steep slopes and vegetation. The initial area for MEC surface clearance will cover 194 acres with additional step-outs as prescribed. See map on page 23.
2. Step-out procedure, as described in section 4.9 of the 2010 RAU 3 CAP applies (no change to 2010 RAU 3 CAP).
3. Institutional controls including engineering controls signage to inform the public about this area's past usage, fencing to restrict access, and land use controls (restrictive deed covenants) to prohibit any future development and/or forestry and intrusive activities at this site (no change to 2010 RAU 3 CAP).

Introduction to Summary Response

Proposed changes to the CAP for RAU 3 were issued for public comment on November 29, 2018, and the public comment period ran through February 15, 2019. A public meeting was held on February 6, 2019. During the public comment period, Ecology provided the following public involvement materials and notices:

1. Mailed a fact sheet describing the site and the proposed change to addresses in the area and other interested parties.
2. Distributed a fact sheet announcing an extended comment period and public meeting (held on February 6, 2019, at the Vancouver Community Library).
3. Published paid advertisements in the Oregonian, Columbian and the Reflector newspapers.
4. Published notices in the Toxics Cleanup Program Site Register.
5. Posted draft documents on the Ecology website.
6. Provided copies of the documents through information repositories at:
 - Vancouver Community Library
 - Camp Bonneville Field Office
 - Ecology's Headquarters Office

This summary response to public comment provides information about the Camp Bonneville site and responds to public comments about the Western Slopes Area that were received during the public comment period. Ecology has reviewed and carefully considered all comments received on the proposed change and determined that the proposed amendment will move forward with the finalized 2019 amendment to the CAP.

Camp Bonneville Cleanup Site

Frequently Asked Questions

This section answers some of the common questions raised about the site. Responses to written comments received during the comment period begin on page 12.

Who is responsible for cleanup?

Ecology maintains overall responsibility and approval authority for the activities outlined in the Amended Proposed Purchaser Consent Decree. Clark County is responsible for cleanup at the Camp Bonneville site. Ecology will oversee all future cleanup activities conducted by the county and their contractors to ensure that contamination on the Site is cleaned up to standards that protect human health and the environment, as established in state regulations.

Who pays for cleanup?

For the Camp Bonneville site, the Army provides funding directly to Clark County to support cleanup activities. Clark County manages the funds and reimburses Ecology staff time as appropriate. To date, the Army has provided funds for all cleanup activities conducted at the site.

When will cleanup take place?

Cleanup activities at the Camp Bonneville site have been ongoing since the Camp closed in 1995. Cleanup in some areas has been completed, and additional cleanup work is planned in several locations. For more information on future cleanup work, visit Ecology's website at <https://fortress.wa.gov/ecy/gsp/Sitepage.aspx?csid=11670>

How does the cleanup protect against harm to people or the environment?

The cleanup supervised by Ecology is intended to clear contaminants from areas that have been identified for possible future public use. Areas that cannot be cleaned to a safe level will be permanently fenced or access restricted. Regular monitoring and removal of munitions that may emerge to the surface will be conducted.

Are there logging activities at the Camp Bonneville site?

There are no commercial logging activities within the Camp Bonneville site. The Washington Department of Natural Resources (DNR) owns property near the Camp Bonneville site. This land is used as a quarry and is separate from the Camp Bonneville cleanup site. Logging activities on DNR lands do not impact or affect the cleanup of the site. There are no plans for DNR to transport any timber through Camp Bonneville. Ecology does not have authority over these operations. For more information on DNR activities please contact DNR or Clark County representatives at (360) 566-6992.

Comments and Responses

The comments received were reviewed and evaluated by Ecology and Clark County. Comments were categorized into six areas for response. The comment categories include:

1. Public comment period extension/meeting

Comments about the request to extend the comment period and hold a public meeting.

2. Proposed initial cleanup area

Comments about changes to the initial cleanup area for the Western Slopes.

3. Safety of cleanup

Comments about the safety of the cleanup.

4. Liability

Comments about legal liability for incidents that may occur at the site and the potential for increased liability due to the proposed change to the CAP.

5. Community involvement

Comments about the interest of the community to be informed and involved in decisions about future use of Camp Bonneville.

6. Future land use

Comments about the future use of Camp Bonneville following cleanup.

A total of 24 persons provided comments regarding the draft documents.

List of Commenters:

- Karen Pickering, Commenter: I-1
- Mark Meredith, Commenter: I-2
- Amy Bunker, Commenter: I-3
- Nancy Benson, Commenter: I-5
- Ann Shaw, Commenter: I-6 and I-20
- Steven Hokett, Commenter: I-7
- Paulina Oberg, Commenter: I-8
- Barry Chalcroft, Commenter: I-9
- Eric Nambo, Commenter: I-10
- Derya Ruggles, Commenter: I-11
- A.G. Flynn, Commenter: I-12
- Elizabeth Hofmann-Hicks, Commenter: I-13

- Peter Christ, Commenter: I-14
- Allen Thomas, Commenter: I-15
- Gregory Shaw, Commenter: I-16
- Rozanne Bass, Commenter: I-17 (I-4 was a duplicate)
- Meredith Shaw, Commenter: I-18
- Michael Sermone, Commenter: I-19
- (unknown), Commenter: I-21
- Ryan & Megan Kramer, Commenter: I-22
- Karen Kingston, Commenter: I-24 (I-23 was a duplicate)
- Christine Neill, Commenter: I-25
- Kirk Van Gelder, Commenter: I-26
- Proebstel Neighborhood Association (Erin Allee), Commenter: O-1 and O-2

General Response to Comments Received

This statement provides a comprehensive response to all comments received. Comment responses by topic category are provided beginning on page 14.

Thank you for your comments regarding the proposed amendment to the 2010 Camp Bonneville CAP for RAU 3 Western Slopes Area (WSA). Ecology held a comment period on this proposed amendment from November 29, 2018 through February 15, 2019.

An open house and public meeting was held on February 6, 2019, to provide information, hear your concerns, and respond to your questions. Ecology has reviewed and considered the formal comments given during this comment period.

During Army operations, the WSA was used primarily as a maneuver area for troop training and was not used as a target area. Use was limited to non-live fire exercises, such as troop movement, hand-to-hand combat, practice assaults/defense bayonet and obstacle courses. Historical documentation about the WSA suggests a low probability of encountering MEC. Clark County's expected future reuse of the WSA is planned to be limited to hiking on roads and trails.

The amended CAP focuses the initial area where surface clearance will begin. This decision was based on results and observations from investigations and cleanups conducted in the WSA over the past 20 years. Following development of the 2010 RAU 3 CAP, additional documented sources of information include:

- Pilot and transects studies.
- Observation and knowledge obtained from MEC surface and subsurface clearance of six firing positions.
- Observations and experience obtained through extensive support for Unexploded Ordnance (UXO) identification conducted during two timber-thinning maintenance operations.

The amended cleanup also uses an adaptive management approach to ensure that new information added over the course of each phase of the cleanup at Camp Bonneville is considered and used to improve the cleanup strategy. Using this adaptive management approach, the initial area of the WSA cleanup will be expanded if findings during cleanup indicate that MEC contamination extends beyond the initial cleanup area.

The cleanup remedy also provides ongoing required institutional controls as additional protective measures. These measures consist of regular surface inspections, and surface inspections following seasonal weathering or erosion including frost heave, fencing, signage, and informational and educational measures depending on land use. These measures are designed to mitigate potential residual risks posed by any undiscovered MEC.

The proposed amendment to the WSA cleanup was developed after careful review of information gathered from investigations, studies and field experience during the 20-year life span of this project. Ecology and Clark County have reviewed and carefully considered all comments submitted by the public during the comment period. Ecology has determined that the proposed amendment to begin the surface clearance of the WSA in an initial area of 194 acres will move forward. The focused cleanup approach is protective and reasonable based on the information known about the WSA and planned future land use for the property.

Ecology has finalized the 2019 amendment to the cleanup action for the WSA, as described in section 5.2 of the 2010 CAP for RAU 3. This change amended the 2010 CAP for RAU 3, Site-wide Munitions.

The amended CAP for the WSA includes:

1. As amended: Vegetation removal, and surface MEC clearance of all areas with a slope less than 25 percent. This is based on new information including a recent 2017 pilot test and access limitations of steep slopes and vegetation. The initial start area for MEC surface clearance will cover about 194 acres with additional step-outs as prescribed. See Figure 3 for map of the area).
2. Step-out procedure, as described in section 4.9 of the 2010 RAU 3 CAP applies (no change to 2010 RAU 3 CAP).
3. Institutional controls including engineering controls signage to inform the public about this area's past usage, fencing to restrict access, and land use controls (restrictive deed covenants) to prohibit any future development and/or forestry and intrusive activities at this site (no change to 2010 RAU 3 CAP).

Additional information about the cleanup at Camp Bonneville is available on the project webpage at <https://fortress.wa.gov/ecy/gsp/Sitepage.aspx?csid=11670> or you may contact the project manager, Ben Forson at (360) 407-7227 or (360) 566-6980 or email Ben.forson@ecy.wa.gov.

Comment Response by Category

A topical summary of comments with Ecology's response follows below. See the appendix following page 24 for a full record of comments received during the comment period.

1. Public Comment Period Extension/Meeting

Responses included in this category relate to comments about the request to extend the comment period and hold a public meeting.

Comment	Ecology's Response
Request that Ecology extend the public comment period and host a public meeting to discuss the proposed changes before the comment period ends.	Ecology extended the comment period to February 15, 2019 and held a public meeting on February 6, 2019. The public comment period ran in full from November 29, 2019 – February 15, 2019. The meeting began with an open house and ended with a public hearing opportunity to provide formal oral testimony. The meeting included a presentation and time for Ecology and Clark County to respond to questions from the audience.

2. Proposed Initial Cleanup Area

Responses included in this category relate to comments about changes to the initial cleanup area for the Western Slopes.

Comment	Ecology's Response
2.1 Because past cleanup efforts have found more ordnance and contamination than was expected and over larger areas, Ecology should not reduce the cleanup area in the Western Slopes Area from the planned 425 acres. A thorough cleanup approach is important for public safety.	The WSA was not a target area and was used primarily as a maneuver area for troop training. Historical documentation about the WSA suggests a low probability of encountering MEC. The planned reuse of the WSA informed the cleanup strategy, and Clark County's expected future reuse of the WSA is planned to be limited to hiking on roads and trails. Surface clearance has been completed of the roads and trails area including a 20-foot buffer along each side of the road or trails. Other areas within the WSA will not be open for reuse. However, areas with slope less than 25 percent within the WSA will be surface cleared for MEC. The proposed initial surface clearance area will expand as needed through the

Comment	Ecology's Response
	<p>adaptive management process to meet cleanup objectives identified in the RAU 3 CAP 2010. This cleanup approach is used to assure that new information obtained over the course of each phase of the cleanup at Camp Bonneville is considered and used to improve the cleanup strategy. The initial WSA cleanup area will be expanded if findings during cleanup indicate that MEC contamination extends beyond the initial cleanup area.</p>
<p>2.2 Sloped areas and areas with vegetative cover are adjacent to the valley floor where public use is likely to be concentrated. These areas are important to be cleared.</p>	<p>The future land use of the WSA will be limited to hiking on roads and trails. Surface clearance has been completed of the roads and trails area including a 20-foot buffer along each side of the road or trails. Other areas within the WSA will not be open for reuse. Areas with slope less than 25 percent within the WSA will be surface cleared for MEC and the cleanup area expanded as needed.</p>
<p>2.3 Typically, amendments have increased cleanup areas rather than reduce the initial area for cleanup based on increased amounts of MEC.</p>	<p>Previous expansion of initial cleanup areas happened as a result of the step-out procedures. This initial cleanup area of the WSA will also be expanded as needed.</p> <p>The size of the initial cleanup area for each of the RAU 3 areas was defined in 2010 based on available information and best management practices. Since 2010, collection of on-site data collected and field observations during the cleanup of the specific areas resulted in the initial cleanup area being expanded in several areas in RAU 3.</p> <p>In the WSA, the 2010 estimated size of the initial cleanup area was based on historical data and investigations available at that time. Since 2010, new data from surface clearance of six areas of</p>

Comment	Ecology's Response
	<p>the WSA and from the 2017 pilot test provided additional information that indicated the initial cleanup area had been overestimated and to support a correction of the size of the initial cleanup area to 194 acres. Similar to other areas of Camp Bonneville, Ecology understands that observations collected during surface clearance of the WSA may require an expansion to the size of the cleanup area.</p>
<p>2.4 The step-out process only applies to areas of investigation, so large areas of the Western Slopes may not be sampled at all if they are beyond the step-out areas.</p>	<p>Any portion of the WSA beyond the step-out areas will be subject to additional protective measures including ongoing institutional controls. These measures include regular surface inspections, surface inspections following significant weathering or erosion including frost heave, fencing, signage and informational and educational measures depending on land use. These measures are designed to mitigate potential residual risks posed by any undiscovered MEC. Details of institutional controls will be developed by Clark County and presented in a long-term operations and maintenance plan. Periodic reviews are required every five years to evaluate the effectiveness of the cleanup actions including institutional controls. The draft five-year review reports will be provided for public review and comment.</p>
<p>2.5 Additional detail on the background studies Ecology has conducted is necessary to be able to evaluate Ecology's proposal. BCRRT's oversight of those studies should be considered when evaluating those studies.</p>	<p>All relevant background studies are contained in the administrative record and are available for review at the information centers listed in the fact sheet. Ecology performed oversight of the BCRRT's studies and cleanup actions as they were conducted, including those related to the WSA. This includes the Roads and Trails and 2.36-inch Rocket Range cleanup actions. Ecology is fully aware of the content of the studies and confirms their validity and accuracy.</p>

Comment	Ecology's Response
2.6 No risk assessment has been conducted and made available to the public.	There is no agreed upon methodology for risk assessment for MEC. Decisions to reduce risk are made based on future land use and are reflected in the CAP. Site specific risk evaluations were conducted during all phases of the cleanup, including the WSA. They were required in the RI/FS and 2010 CAP for RAU 3.

3. Safety of Cleanup

Responses included in this category relate to comments about the safety of the cleanup.

Comment	Ecology's Response
3.1 Consider how this proposed change will impact the safety of future public and conservation uses for Camp Bonneville, as well as surrounding residential developments. The locations of MEC are unpredictable and pose a higher public safety hazard.	<p>This amendment will not change the safety of the cleanup or future land use. It remains protective. This cleanup was designed based on plans for future use, which is limited to hiking on roads and trails in the WSA. This area does not include any other uses. Public access to the WSA will not change based on this amendment.</p> <p>Institutional controls are required as a part of the remedy described in the RAU 3 CAP for the WSA. This includes fencing, signage, annual inspections and clearance, educational measures, and land use controls (restrictive deed covenants) to prohibit any future development and/or forestry and intrusive activities at this site. The purpose of institutional control measures is to further reduce any remaining risk on the property.</p> <p>Community involvement will be included in the County's operations and maintenance planning process as future land use planning progresses. The long-term operations and maintenance plan will describe implementation of institutional</p>

Comment	Ecology's Response
	<p>controls on the property. The plan will be reviewed and approved by Ecology.</p> <p>Ecology will retain long-term responsibility for reviewing five-year reports and providing for public review and comment on those reports.</p>

4. Liability

Responses included in this category relate to comments about legal liability for incidents that may occur at the site and the potential for increased liability due to the proposed change to the cleanup plan.

Comment	Ecology's Response
<p>4.1 As the property owner of Camp Bonneville, Clark County is liable for any impacts resulting from a reduced cleanup area. Cleanup should be thorough to reduce this liability for the County.</p>	<p>Under the 2006 land transfer agreement from the Army to Clark County, the Department of Defense permanently retains all liability for any injury or death related to munition incidents.</p>

5. Community Involvement

Responses included in this category relate to comments about the interest of the community to be informed and involved in decisions about future use of Camp Bonneville.

Comment	Ecology's Response
<p>5.1 Neighboring communities should be engaged and involved in the decision processes about future uses for Camp Bonneville.</p>	<p>Clark County is forming an advisory board to participate with the County as future land use decisions are made for this property and as the long-term operations and maintenance plan is developed. The County plans to include several community members on this board.</p> <p>Ecology provides public notice and comment periods on proposed site cleanup decisions.</p>

Comment	Ecology's Response
	<p>Historically, the community members have participated in many discussion forums related to the Camp Bonneville cleanup and potential future land use. The Army, Ecology and Clark County have invited public engagement about this cleanup at Camp Bonneville since 1995. This included the Restoration Advisory Board (RAB) (1995-2006) with about 15 community members as well as involvement on the Local Reuse Authority (1995-1997). Following the RAB, Clark County facilitated a Community Advisory Group of ten community members (2006-2010), intended to keep the community informed of cleanup activities and future land use planning discussions. Ecology has held numerous public comment periods and public meetings about proposed site cleanup decisions and has distributed periodic newsletter updates about the cleanup at the site.</p>

6. Future Land Use

Responses included in this category relate to comments about the future use of Camp Bonneville following cleanup.

Comment	Ecology's Response
<p>6.1 The cleanup should protect public safety for future uses of Camp Bonneville, including areas near the Western Slopes Area where past cleanups have found significant munitions. Future uses could consist of a variety of uses including: public access to nature, educational opportunities, and preservation of natural resources, research, veterans' cemetery and cultural uses.</p>	<p>Also see responses 2.1, 3.1 and 5.1. As the property owner, Clark County is responsible for determining how the land is used in the future. There was an extensive public process in the late 1990s to develop a concept plan showing intended park uses. This concept plan helped determine an appropriate cleanup action plan at the site. Any future land use decisions will be consistent with the cleanup.</p>

Comment	Ecology's Response
	<p>The reuse of the WSA will be limited to hiking on roads and trails. Surface clearance has been completed of the roads and trails area including a 20-foot buffer along each side of the road or trail. Other areas within the WSA will not be open for reuse. Areas with slope less than 25 percent within the WSA will be surface cleared for MEC. This cleanup area will be expanded as needed.</p> <p>Ideas and questions about future land use can be directed to Clark County. Contact Kevin Tyler at Clark County at (360) 397-6140 ext. 4258 for more information.</p> <p>Clark County has invited community members to join an advisory board to participate with the County as future land use decisions are made for this property</p>

Explanatory Figures

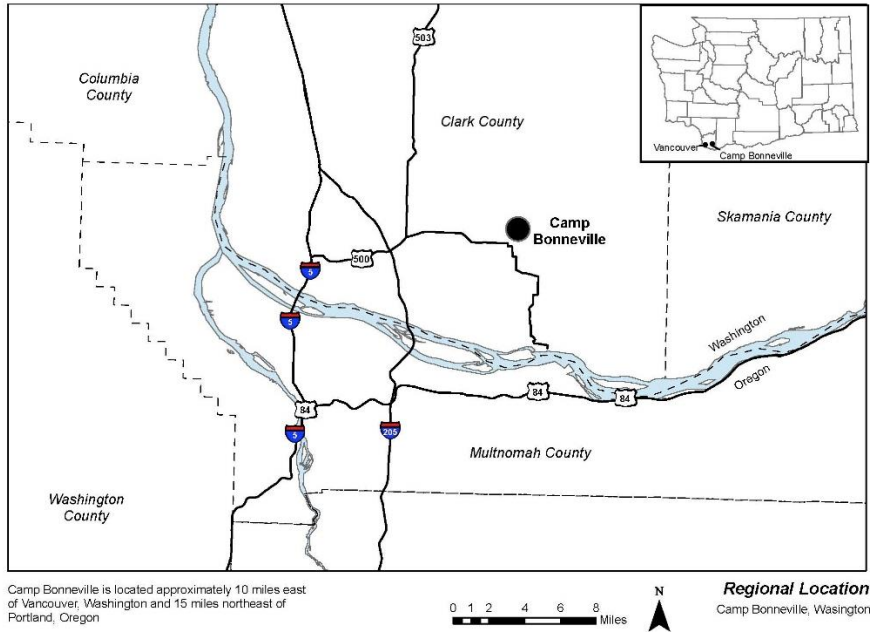


Figure 1. Location of Camp Bonneville Military Reservation Site.

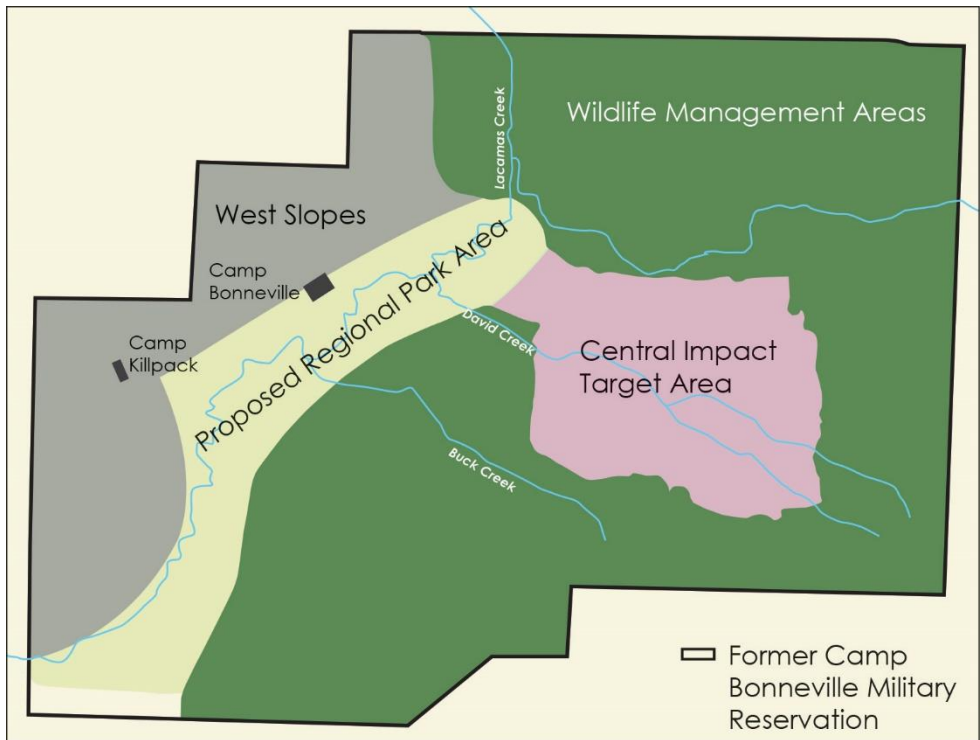


Figure 2. Camp Bonneville Site map.

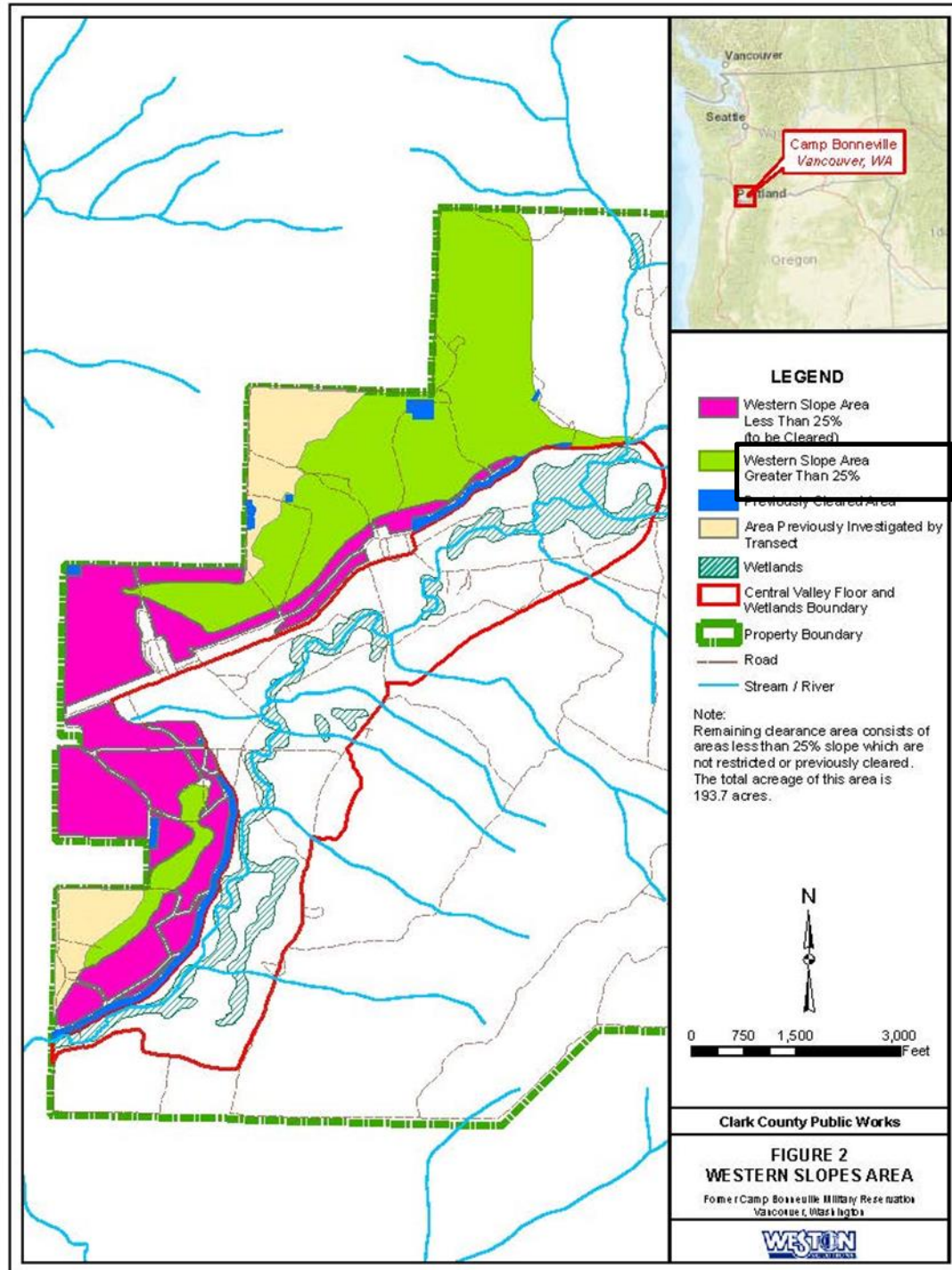


Figure 3. Camp Bonneville Western Slopes Area.

Ecology Contact Information

For more information on the Camp Bonneville Site, contact:

Ben Forson – Site Manager
Department of Ecology Toxics Cleanup Program
PO Box 47600
Olympia, WA 98504-7600
Phone: (360) 407-7227
Email: ben.forson@ecy.wa.gov

Ronnie Johnson – Project Specialist
Department of Ecology Toxics Cleanup Program
PO Box 47600
Olympia, WA 98504-7600
Phone: (360) 407-6487
Email: ronnie.johnson@ecy.wa.gov

To review documents:

Vancouver Community Library
901 C Street (4th floor)
Vancouver, WA
Phone: (360) 906-5000

Camp Bonneville Office
By appointment
23201 NE Pluss Road
Vancouver, WA
Contact Jerry Barnett at
(360) 566-6993
jerry.barnett@clark.wa.gov

Department of Ecology Headquarters
300 Desmond Drive SE
Lacey, WA 98503
By appointment only:
Contact Carol Dorn
Phone: (360) 407-7224
Email: carol.dorn@ecy.wa.gov

Ecology's Website
<https://fortress.wa.gov/ecy/gsp/Sitepage.aspx?csid=11670>

Comments and Responses

The comments received were reviewed and evaluated by Washington State Department of Ecology. Comments were categorized into six areas for response. The comment categories include:

- 1. Public comment period extension/meeting*
- 2. Proposed initial cleanup area*
- 3. Safety of cleanup*
- 4. Liability*
- 5. Community involvement*
- 6. Future land use*

A total of 24 persons provided comments regarding the draft documents, including more than 10 requests to hold a public meeting. In the comment table, each commenter is referenced by an assigned commenter number.

List of Commenters:

Karen Pickering, Commenter: I-1

Mark Meredith, Commenter: I-2

Amy Bunker, Commenter: I-3

Nancy Benson Commenter: I-5

Ann Shaw Commenter: I-6 and I-20

Steven Hokett, Commenter: I-7

Paulina Oberg, Commenter: I-8

Barry Chalcraft, Commenter: I-9

Eric Nambo, Commenter: I-10

Derya Ruggles, Commenter: I-11

A.G. Flynn, Commenter: I-12

Appendix A

Record of Comments received during the 2018/2019 Comment Period Regarding Cleanup of the
RAU 3 - Western Slopes Area of Camp Bonneville.

Elizabeth Hofmann-Hicks, Commenter: I-13

Peter Christ, Commenter: I-14

Allen Thomas, Commenter: I-15

Gregory Shaw Commenter: I-16

Rozanne Bass, Commenter: I-17 (I-4 was a duplicate)

Meredith Shaw, Commenter: I-18

Michael Sermone, Commenter: I-19

(unknown), Commenter: I-21

Ryan & Megan Kramer, Commenter: I-22

Karen Kingston, Commenter: I-24 (I-23 was a duplicate)

Christine Neill, Commenter: I-25

Kirk Van Gelder, Commenter: I-26

Proebstel Neighborhood Association (Erin Allee), Commenter: O-1 and O-2

Appendix A

Record of Comments received during the 2018/2019 Comment Period Regarding Cleanup of the
RAU 3 - Western Slopes Area of Camp Bonneville.

1. Public comment period extension/meeting

Comment

I-1-1

I would like request a public meeting for this proposed reduction in cleanup within the Western Slopes area at the Camp Bonneville Military Reservation Site. [Commenter: I-1]

I-3-1

I request a public meeting on the issues described for Camp Bonville, as I am a homeowner in Diamond Ridge Estates. If possible, could delay the meeting until end of January as the December Holidays are upon everyone. The clean up action plan for the Bonniville site does not address some issues that I am concerned about and must be expressed publically.

[Commenter: I-3]

Appendix A

Record of Comments received during the 2018/2019 Comment Period Regarding Cleanup of the RAU 3 - Western Slopes Area of Camp Bonneville.

I-4-2

I'd like to request that a public meeting be held on the matter. Also, I'd like to request that the comment period be extended to the end of January since the holidays are a very busy time for most people and families and this could easily be overlooked by some due to the busyness of the season. Sincerely,

[Commenter: I-4]

I-5-1

I have rec'd notification that there is an opportunity to submit public comment regarding Camp Bonneville. The notice and time frame does not give us a reasonable amount of time to address this significant issue. I believe a public meeting should take place - and not in December. Holiday travel plans have already been made by most families at this point. January would give time for preparation and ability for more people to attend. In addition, the comment period should last at least through January 2019.

[Commenter: I-5]

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I-6-1

I am writing to express my concerns about the proposal to limit the clearance of ordnance in the Western Slopes Area of Camp Bonneville.

This proposal must be presented to the public in an open public meeting. Therefore I am requesting: 1) that an open public meeting be schedule about this matter after Dec 31, 2018 and that it be scheduled at a venue convenient to those who live in the neighborhood surrounding Camp Bonneville. 2)that the period for public comment be extended for an additional 60 days. Limiting the period of public comment to precludes broad public input due to the rush of public business at the end of the year and the limits this busy holiday season imposes.

[Commenter: I-6]

I-8-1

I request a public hearing.

[Commenter: I-8]

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I-10-1

I would like a public hearing for comment.

[Commenter: I-10]

I-12-1

The primary comment I would like to submit is a suggestion that the responsible parties involve the public in more than just dry comments.

I request a public meeting so that we may learn more about this proposal.

Please include me on any announcements, notices or other public information about this project.

[Commenter: I-12]

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I-13-1

I'd like to request a public hearing for information related to proposed changes to the camp bonneville clean up plan

[Commenter: I-13]

I-14-1

As a close neighbor to Camp Bonneville, I am very concerned about its future.

I request that a public meeting be held on proposed cleanup.

Since December is a month that is difficult for many people to comment or even see any proposals, I request that the public comment period be extended to at least the end of January.

The newsletter that I received from the Dept. of Ecology about the cleanup is not very clear as to the areas that are not to be cleared. One has to wonder what happens to those areas. Do they get ignored, or do they get sold to private interests to do whatever those interests want?

A public meeting might help clarify the issues.

I look forward to hearing from you.

Incidentally I tried to send a copy of this email to jerry.barnett@clark.wa.gov. I got the message that it is not a valid email address. This address was on your newsletter. Do you know what the problem is?

[Commenter: I-14]

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I-15-1

I am a resident of eastern Clark County, living about a mile from the west gate of Camp Bonneville. I am requesting a public meeting about the proposed changes to the cleanup of Remedial Action Unit 3 regarding the Western Slopes Area at the camp.

Your fact sheet of Nov. 18, 2018 states a public meeting will be held if at least 10 people request one during the comment period of Nov. 29-Dec. 31, 2018.

Your fact sheet mentions the WSA will mainly be hiking trails and environmental preservation. I look forward to some day hiking in Camp Bonneville. I think I'd learn more about the WSA cleanup and the proposed changes at a face-to-face meeting than from reading documents and exchanging emails.

[Commenter: I-15]

I-16-1

I request that a public meeting be scheduled to address reducing the stipulated scope of cleanup on the Western Slopes section of Camp Bonneville.

[Commenter: I-16]

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I-17-2

I'd like to request that a public meeting be held on the matter. Also, I'd like to request that the comment period be extended to the end of January since the holidays are a very busy time for most people and families and this could easily be overlooked by some who have an interest due to the busyness of the season.

[Commenter: I-17]

I-18-1

I own property in Livingston Mountain that borders Camp Bonneville. I understand that there is currently a brief period available for public comment on proposed revisions to the plan to remove ordinance from the camp. I'd like to make a few requests, please.

1. Please extend the period for public comment until the end of January. My professional and personal commitments over the holidays will make it difficult for me to review and respond to the proposed changes in the current time frame.

2. Please host a public meeting to discuss the proposed changes. I have concerns that I would be grateful to learn more about, and I think these matters are more easily clarified through conversation than over email.

[Commenter: I-18]

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O-1-1

My name is Erin Allee and I'm the President of the Proebstel Neighborhood Association (PNA) representing 3076 households. As you are likely aware this is the Clark County sanctioned NA in which Camp Bonneville is located. In accordance with the Appearance of Fairness Doctrine I would like to formally request a public meeting after the holiday season and prior to a formal comment deadline to further inform the public on this proposed reduction in clean-up acreage. Note: a map of the neighborhood association area was included in the comment. To do this you may have to extend your formal comment deadline of Dec. 31st, 2018. To do this you may have to extend your formal comment deadline of Dec. 31st, 2018.

(Also see Figure A-1)

[Commenter: O-1]

2. *Proposed Initial Cleanup Area*

Comment

I-4-1 (duplicate of 1-17, same person and comment)

I've received the information about the request for changes to the cleanup plan on the Western slopes of Camp Bonneville. Within the past two years, my husband and I have purchased 20 acres of property that shares a boundary with Camp Bonneville and built a new house. Because our land is adjacent to Camp Bonneville, we are very interested and concerned about decisions made regarding that land. We are aware that there has been even more ordnance and contamination found already than had previously been expected or documented, and we feel that scaling back clean up would NOT be in our own best interest or the best interest of the general public. There would be too much potential for unknown contamination and opening to the public would be a mistake without knowing this area has been cleaned up and is safe. I understand that the cleanup has been much more expensive and extensive than originally anticipated, however, we feel it is important that the job be done thoroughly and completely even if it takes longer and costs more.

[Commenter: I-4]

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I-5-2

The idea of minimizing the scope of cleanup seems ill advised and dangerous. My understanding at this point is that there is more contamination and leftover munitions than originally thought. If your property abutted this area, and you had children and pets - would you think doing a half-effort job would be acceptable? I hope there is someone within the Dept of Ecology that cares, and aspires to fulfill the original agreement - at the very least.

[Commenter: I-5]

I-6-2

3) The amount of ordnance and contamination thus far discovered at Camp Bonneville has been far more extensive than originally estimated. Similarly, the areas impact by this ordnance and contamination is also far more extensive. Military training exercises involved extensive areas of the camp and unknown amounts of live ordnance was buried after such training activities. In addition, ordnance and contamination has been found over broad areas of private property outside the Camp's boundaries. This suggests that the Western Slope areas were also subject to unknown military training activities that left behind undocumented ordnance and contamination *must* be cleared. This proposal to not clear areas of Camp Bonneville is not in the public interest.

[Commenter: I-6]

I-17-1

I've received the information about the request for changes to the cleanup plan on the Western slopes of Camp Bonneville. Within the past two years, my husband and I have purchased 20 acres of property that shares a boundary with Camp Bonneville and built a new house. Because our land is adjacent to Camp Bonneville, we are aware that

there has been even more ordnance and contamination found already than had previously been documented, and we feel that scaling back clean up would NOT be in our own best interest or the best interest of the general public.

There would be too much potential for unknown contamination and opening to the public would be a mistake without knowing this area has been cleaned up. I understand that the cleanup has been much more expensive and extensive than originally anticipated, however, we feel it is important that the job be done thoroughly and completely even if it takes longer and costs more.

[Commenter: I-17]

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I-18-2

Based on my preliminary review, I have some serious concerns that your department is not taking the removal of ordinance at Camp Bonneville as seriously as it needs to be taken. Every time we learn more about the conditions on the ground there, it becomes clear that the effort to mitigate the area will need additional time and resources, not less. I hope you will provide sufficient opportunities for dialog with the public about our priorities regarding Camp Bonneville and the role you will need to play.

[Commenter: I-18]

I-19-1

I'm opposed to the reduction of cleanup area on the Western Slopes. My primary objection stems from the presentation on February 6 at the public library that many CAPS have expanded not shrunk due to the adaptive management process.

[Commenter: I-19]

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I-20-1

I am submitting these comments in response to the Feb 6, 2019 public meeting concerning a proposed change to the 2010 Cleanup action Plan for RAU-3 for Camp Bonneville. This plan proposes a reduction in the acreage to be surface cleared from 425 acres to 195 acres. The supporting data offered cites assumptions about known firing positions and direction of fire, accessibility related to terrain and vegetation coverage, and information garnered from previous work.

The reduction in surface clearance coverage raises many concerns.

1) The focus of the current proposal is on MEC. There is no discussion of related contaminants (e.g. perchlorates or lead) or of MD. Ground seep of contaminants remains a serious concern for areas that have not been cleared while the presence of MD represents an "attractive hazard" once that area is opened for public use.

2) Very little specific data is cited in the current proposal made available to the public. Six studies between 1998 and 2017 are cited as the basis for this proposal. Yet very little specific data as well as few technical reports are posted on Washington State Dept of Ecology or Clark County websites. If previous clearance work is used as the basis for reducing the proposed acreage for clearance, the public has no detailed information available for evaluating or understanding this proposal.

3) The previous clearance work operated under very different cleanup protocols. Each protocol is an ad hoc method of discovering scattered materials. Areas of anticipated concentrations have been the focus of this work, yet previously unknown areas of concentrations (the 2.36 inch rocket range) demonstrate the limitations of these techniques. The various ad hoc techniques have no unifying technical or statistical basis for identifying MEC and MD. In addition, contaminants beyond metal fragments are not discussed. No soil testing to accompany the surface clearance was discussed in the publically available information.

3) For the initial 1998 characterization of Camp Bonneville, very poorly documented information was available about training activities at the Camp. It is now known that was substantially greater training activity than was documented. Much larger areas of Camp Bonneville contain MEC and MD than previously anticipated. During earlier phases of cleanup, initial areas had to be greatly expanded as the presence of MEC and MD was found. Citing sloped areas and vegetation cover as reasons to remove areas from cleanup is not supported by the information presented. These areas are adjacent to the valley floor where public access is expected to be concentrated. The potential for these areas to be accessed by the public, even if unauthorized, is very high. Removing acreage from clearance is not supported by what is currently known about Camp Bonneville.

4) No sampling is proposed within the large areas to be removed from surface clearance. Step out procedures apply only to areas of investigation. This means substantial acreage will potentially be declared "safe" when there were no means to adequately certify the lack of MEC, MD or other contaminants. Clearance along the linear roads in these areas does not adequately account for the possibility that other previously unknown ranges or firing positions exist, or that firing spray areas could have impacted these areas. All such hazards require investigation and cleanup.

5) There was no discussion of environmental hazards and the implications of removing areas from investigation.

5) In addition, it is a serious issue that no risk-assessment was offered at this public meeting. It is noted, "As we characterize, we cleanup, and as we cleanup, we characterize." Two phases of the munitions cleanup have been completed, the third phase is on-going, yet no formal risk-assessment was discussed or

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presented. It is clear that substantially more MEC, MD and other contaminants were left at Camp Bonneville than previously believed. It is also clear that the Camp can never realistically be cleared of all MEC, MD and other contaminants. The problem of "managing risk" was briefly noted in the public presentation. Without a formal risk-assessment that is made available to the public, it is impossible for the public to provide informed comment about the on-going cleanup activities.

I am formally requesting that an independent party (not Dept of Ecology, not Clark County and not any current contractor) conduct a risk-assessment of Camp Bonneville, and that this risk-assessment process include members of the neighboring community. The Department of Defense funded a substantial number of studies focused on the issues of UXO cleanup and the BRAC process.

[Commenter: I-20]

I-22-1

We agree with the PNA (Proebstel Neighborhood Association) request that ecology maintain the full 425 acres for cleanup, not the reduced 194 acres. It is impossible to know, as asserted, that firing was limited to the east. Further, data you present supports that the expected areas were vastly increased in size and scope. Munitions previously unknown to have been fired were found, which supports the theory that the slope you propose to abandon cleaning could be dangerously contaminated in areas not tested under the methodology created. It is also possible that no contamination or unexploded ordinance exist, but in opening access to the public it is much better to err on the side of safety.

[Commenter: I-22]

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I-23-1

(This is the same person and comment as recorded in I-24)

[Commenter: I-23]

I-24-1

Thank you for the opportunity to comment on proposed changes to RAU-3 Western Slopes.

Initially, the greatest challenge to releasing a military weapons training base into public uses is the fact that times are changing, technology changes by the minute, old reports, companies, and entities like the BCRRT are revealed to be seriously flawed. Trusting Counties and States can be thrust into a future nightmare of litigation and tort claims. The GAO already predicted bankruptcy for cities, counties, and states as licensees and lessors may be under even deeper liability.

I have been involved with Camp Bonneville (CB) via initial closure committees, then to RAB involvement, on to my position as RAB co-chair, and was there initially to welcome DOE administrators like Barry Rogowski, Ben Forson, and Greg Johnson whom I am delighted to see are still in regulation oversight roles. In my opinion, I want to thank DOE for their extraordinary work. I had initial trepidation when the lead agency role moved from EPA to WADOE. This has now been laid to rest with DOE's track record.

The following are my areas of concern at this juncture:

1. Initial archive reports, UXO/MEC recon designed to suit draft transfer documents required by BRAC, military officers/personnel detailed accounts of orders and post-op firing reports, and commander decisions to bury unused explosives and paraphernalia reveal AOC (areas of concern). The majority of these AOC's have not had sufficient reconnaissance or environmental scrutiny. The computer modeling that was used at CB incorporated modern firing and munitions comparisons. This is now known to be flawed because it misidentified how much the firing points had been used and how many times the artillery fired and/or what each load was. Ditches, trenches, and holes were dug and now known to hold more items than the initial command order at that time. (i.e. Landfil4 was found to have far beyond the archives stating: Fireworks Burial. I personally saw a 105 shell after removal from LF-4)DOE states assumptions in RAU-3 and therefore we also must assume we have not yet located items that will cause grievous harm to the public, wildlife, and eventually the environment.

A. Burials were by hand, hand implement, and tractor. Burials were contained in bags, containment canisters and boxes, heavy metal ammunition boxes, and wooden crates that decompose and leak.

B. Changing to surface clearance places a burden upon Clark County for added liability. DOE, the US Army, DoD, and WA State are free from liability; however the Clark County Commissioner negotiating

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the transfer kept liability intact for County or Lessee uses, modifications, and changes to the clean up. The public, as landowners, should not bear the legal results the future will bring to light. Therefore, Proposed Changes to the Cleanup Action needs further evaluation.

2. The BCRRT was found to be negligent. The BCRRT was the authority deciding what and how Weston's reports would be generated. The BCRRT was forcibly removed by Clark County. Each analysis, report, and site study needs re-evaluation using current technology. Therefore, I find the decision to use BCRRT evidence to be invalid in an evaluation to change cleanup actions.

3. Accessibility evaluations do not include potential risk factors to Children. All of the stated evaluations use risk models for adults. We need studies for factors relating to Children specifically. Therefore, Accessibility is incomplete.

4. Accessibility evaluations do not include potential risk to Hikers Comfort Pets allowed under current legislation. Therefore, Accessibility is incomplete.

5. Accessibility has not given a risk number or assessment evaluation for CB Maintenance of the Western Slopes with public use. Sacrificing, natural causes of mudslides, frost heave, wind damage and wind cleanup, fence maintenance and replacement, new seeps and new springs which are common occurrences in this area. Therefore, Accessibility is incomplete.

6. Accessibility, Hazard Ranking and other areas do not address Americans with Disabilities as hikers. Motorized, mechanical, and technological advancements that give people with disabilities opportunities are not accounted for in a ground clearance of MEC and UXO for a park used by the public. The ideology that everyone would be walking in shoes or with natural feet is negligent. Therefore, several areas of the Proposed Changes are incomplete.

7. Proposed Changes must include a new and current amendment and change to the Cultural Report and historical preservation report.

8. The western area directly south along the fence line of the western gate is not adequately identified. In the early 1970's the Corp Of Engineers surveyed CB. Due to public outcry and the Corps inability to put plans into operation to address the outcry, the historic graveyard was ignored. The graveyard pre-dates Camp Bonneville. WA state is aware that the number of graves still having markers was much different than the number historically reported to be buried. The Corp's survey moved the fence directly west by many feet into the graveyard. The recognition at the time of the RAB does not fully characterize the graveyard. This area is not identified in RAU plans and reports. DOE should not consider this falling under the rubric of "human remains" inserted in RAU's everywhere in CB. This particular area needs further assessment by professionals and not rated under an assumption by an agency out of scope in this area. Therefore, the Proposed Changes to the Cleanup Action Plan is incomplete.

9. The area within the Western Slopes pertaining to Drum Burials was a workplan with risk factors and incomplete records. The Clark County Commissioner at the time of transfer accepted these factors. This decision needs review and recommitment by CC's current Councilors. Many records of drum burials are unaccounted for. Therefore, DOE should not surmise or predict what is in those drums and containers. Nor should DOE reduce the risk hazard for the purpose of changing cleanup to surface clearance only. More evaluation, recon, and investigation needs to take place. Therefore, the Proposed Changes to the Cleanup Action Plan is premature.

10. The proposed Changes do not address archive evidence of combat orders beyond "Defense" of Firing

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Points. Soldiers were sometimes parachuted, camped, and all performed military actions as if they were defending or taking the firing points. DOE comments on training as defensive when in fact CB was used as training for the opposite. More than one thousand troops at any one time would be training whether they were defending or taking over enemy territory. Thus, weaponry, commander orders etc, were not static.

11. The DOE map in the public handout is confusing. Confusion should never be part of procedures that inform the public.

12. The public handout or presentation did not adequately address grenades. Do-not-address if-not-brought up should never be part of procedures that inform the public.

13. DUDS: The Proposed Changes to the Cleanup Action Plan is both harmful to the public by way of omission and a compromise to elicit DUD's as easy to deal with. The following is gleaned from my own archival records by way of a letter to me from the Under Secretary of Defense: "Explosives accidents occur because items thought to be DUDs are picked up as souvenirs or toys at active and inactive training areas and ranges of military bases. These items may appear insignificant, harmless, or entertaining. They are not. DUDs are explosives devices that have been fired, but have not exploded. Unexploded ordnance (UXO) of all types can be found on impact ranges and training areas. DUDs may be in areas adjacent to ranges and training areas. Grenades, blasting caps, illumination signals, simulators, and a host of other ordnance may not have functioned as originally intended. Picking up DUDs can cost a person a hand or a life. DUDs can explode at any time, especially if handled or moved." Due to the significance of this letter, I find the Proposed Changes to the Cleanup Action Plan both premature and without adequate investigation both above ground and under the ground.

14. Hazard Severity Ranking – The use of the word/term "suggests" creates a low to nothing probability in the case of military cleanup. In RAB records it is easy to find confirmations of hypothetical thinking by using terms such as Abandonment instead of Burial, suggesting a hand implement dug hole was only one foot deep when it is common knowledge commands had troops digging vast holes, trenches, and ditches, and the term Pyro or Pyrotechnics. In these same records, letters from the DOD, and presentations, this lucid thinking, paraphrasing, and lay assumption was put to rest by way of better clarification even if it feels counterproductive by the agency. Yet, we see this within studies, DOE presentations and handouts, and the Proposed Changes to the Cleanup Action. This can be understandable with agency and county new employees. There are only two weapons training ranges that have the topography issues, trees, and long term use in the United States; Camp Bonneville is one of them. Therefore, due to what looks like a severance of long term knowledge regarding CB being adequately briefed with new employees/assignees/or elected officials, I find the Proposed Changes to the Cleanup Action to be premature.

15. Wildlife, Insect, Noxious Weeds, and Disease is inadequately characterized for long term management and protection of the Western Slopes. Therefore, the Proposed Changes to the Cleanup Action is premature and inadequate.

16. I could not identify a buffer zone or protective perimeter included in the Proposed Changes to the Cleanup Action. This should be clearly defined by engineers and clearly supported within documents regarding risk, public use, site security, and management. Therefore, the Proposed Changes to the Cleanup Action Plan is incomplete.

17. Discussion of protective clothing must be addressed in public use.

18. Investigations pre-dating 2012 should not be included in Proposed Changes to the Cleanup Action Plan

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in 2019. We must include supportive new technology, learned events and legal challenges in today's world, rather than rely on contractor investigations on a base that has no comparisons or uses reference dating back to 1994. An agency plan to learn as we go creates a heavy legal burden for the future. Therefore, unless Clark County, as stewards to the public, has sufficiently addressed their new liability role; the Proposed Changes to the Cleanup Action is premature.

19. The Airport at Killpack has not been sufficiently addressed. Therefore, the Proposed Changes to the Cleanup Action Plan is premature.

20. WADOE should not amend Appendix A Section 2.2.2 by removing the federally required inclusion of "written materials" or "park Management policies". This removal pledges great financial risk, liability, and tort claims.

21. In 2005 a letter in my archives from Maj gen Kenneth Isreal supports the ideology of changing technology and new scopes with challenges facing the DoD at a base like CB. The Cleanup should never remain as fully or totally addressed on old technology or assumptions. We must always use current law, technology, and new investigation with current standards. Nothing about Cleanup should be Grandfathered.

22. Defense Agencies predict that transferred properties with UXO and MEC, especially those with steep terrain and trees, are now within the guidelines of properties under Storage Of Explosives. Acts, Laws, and Regulations of today have caught up with CB. The state of Hawaii is already mitigating its own MEC/UXO areas. This state and other states are moving to Wildlife Refuges, Wilderness Study Areas, and Conservation Properties to label and address a military weapons training facility. Therefore, Proposed Changes to the Cleanup Action Plan may be out of sync with 2019, and is premature until Clark County can address new options available under a conservation transfer of contaminated property.

23. The proposed Changes to The Cleanup do not address the many foreign militaries that leased Camp Bonneville. England, Australia, Italy, three countries within South and Central America, Mexico to name a few on the list, not only brought their own ammunition and weaponry, but used the same US Military Rule that was affirmed in those years, "If you don't use it bury it." Therefore, the Proposed Changes to the Cleanup Action Plan are premature, without public comment, and under investigated.

Thank you for the opportunity to address the concerns I have gleaned from not only networking with other sites, my archival library, and my own concerns.

Respectfully,

Karen Kingston

Former Co-Chair of the Camp Bonneville Restoration Advisory Board.

[Commenter: I-24]

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I-25-1

I am against the proposed changes for the CAP for RAU-3. (Clean-up Action Plan/Remedial Action Unit-3) The U.S. military used this site for over 80 years as a weapons training and troop maneuver grounds. The site is rich in military history, including POW's during the war, foreign troop training, a gas mask chamber, tank practice, land mine practice (sand filled as far as we know, but still had explosives for detection/training), multiple firing points and multiple target areas-all with unknown munition size and quantity used. Munitions can have as much as a 40% UXO rate for some of the very large artillery live training. As the Army marked CB for closure they gave this property to the Land Re-use Authority without any records of where and what was used at CB. Anecdotal characterization, a comprehensive CB records loss in the 1950's from a fire, dangerous disposal methods during training, to name a few, were used as clean-up directives. The characterization of CB is mostly blind. The DOE used the step-out method to chase down undocumented UXO, excellent, but still does not address the unknown and proposed reduced clean-up areas. The grid search areas are large, the site is densely forested and terrain steep. All difficult to protect and address the hazard. Clark County asks for a park. I'd love a park. But not at the cost of the potential hazard. The institutional controls necessary to notify park users of their risk is not sufficient to protect citizens of all ages and languages. I understand that this comment period is not for reuse changes. I needed to preface my motivation. To reduce the risk hazard we need to reduce access to many of these areas in question or modify areas of question to wrap and cap for an unobtrusive/free range-less reuse. Allow for a majority of the site to be a wild life reserve, and fence in trails to protect the general public. The subsurface cleaned areas in the parade ground are best utilized for park-like activities, not the entire site uncleaned. With that said, the basis to keep clean-up activities at the maximum levels and not reduce the areas are as follows:

1. The initial characterization and investigation of CB has too many holes and gaps in data to be sound as a foundational study.
2. Non-homogeneous nature of impact areas. Where targets are and quantity of munitions used are unknown, the step-out method might not find a UXO when a "new" target is too far from the step-out boundaries.
3. The "Gage" factor. When the BCRRT group was hiring consultants and sub-contractors, there was a massive loss in funds to him, that lead to project integrity, actual clean-up taking place, water tests in question, hazardous materials disposed of properly as Gage's egregious management of CB for the few years during prime clean-up activities. This wild-card in clean-up actions, reduces support in a determination to reduce CAP activities.

Thank you for the opportunity to comment on this project. I appreciate what the DOE is doing to protect our citizens and our State. I want to state that my frustration with the Army transfer of CB is in no way a reflection of my sincere appreciation for our U.S. military. This is an important statement in this testimony. I'd love to see CB celebrated for its historical use and honor the men and women that protect our country. Adding this reuse to sensitive areas will help bridge the dilemma of moonscape to protect vs. enjoying the property safely for what it is.

[Commenter: I-25]

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I-26-1

I'm representing myself, although for full disclosure I am co-president of the Neighborhood Association, but I'm speaking personally right now, and just off of a couple notes. First off, I'm concerned that at the Council work session today, we were told that the County staff would have a contract for the cleanup of the Western Slope area to the Councilors within a week or two. So it sounds to me like this plan is already kind of in play, and the meeting tonight for public comment makes me kind of wonder about that so -- and concerned. I'm highly concerned about restricting or reducing the area down to the 194 area as mentioned. It looks like there's -- as it's been testified, there's UXO potentiality across areas that have not been fully investigated under this plan that will likely still be uninvestigated once we complete that. And the risk of people and public being in these areas is very concerning to me. So I would advocate that we broaden rather than narrow the scope of the investigation. Or on the alternative, work towards restricting the public from the areas as an alternative to that. Thank you.

[Commenter: I-26]

O-2-1

The Proebstel Neighborhood Association (PNA) has reviewed the Department of Ecology's (DOE) proposed reduction in Cleanup Action Plan (CAP) from 425 to 194 acres for the Western Slopes Area (WSA) of the Camp Bonneville site located in Clark County, WA. This proposed reduction is for the fourth and final phase of cleanup for RAU-3, the portion of the cleanup that addresses remediation of unexploded ordnance and munitions on the property. The PNA also participated in the February 6, 2019 public meeting located at the Vancouver Public Library.

The PNA objects to this reduction for the WSA CAP for the following reasons:

1. The Clark County Reuse Plan proposes multiple public uses in the valley floor which is located near the WSA area and as such poses a higher public safety hazard. Potential public uses include hiking trails, amphitheater, campgrounds, outdoor school, retreat center and study area. The WSA also encompasses NE Pluss Road, this road is proposed as public use access from the west entrance. (see attached map 1) In addition, more than three-fourths of the approximately 3000 munitions found as of Nov. 1, 2017 were found in the valley floor.
2. The 2006 Finding of Suitability for Early Transfer includes artillery and mortar firing points and safety fan maps (see attached map 2) indicating these areas have a high potential for Munitions of Explosive Concern (MEC). While the DOE believes most of the MEC was fired to the east, discussions during the February 6th public meeting indicated artillery and mortar fans are unpredictable and inconsistent. Because this area will be open to public use it poses a higher public safety hazard.
3. Historically the adaptive management process has led to the following expansions in CAPS. -2008: Previously unknown 2.36 inch Rocket Range increased from no clearance to 3 acres of clearance -2010: Demolition Area 1 cleanup area increased from 5 acres to 106 acres -2010: Central Impact Target Area boundary expanded by 105 acres -2010: Central Valley Floor clearance methodology modified from surface clearance to subsurface clearance -2016: Central Impact Target Area clearance increased from 14 acres to 110 acres -2017: 3.5 inch Rocket Range area of clearance increased from 5 acres to 60 acres

The PNA recommends maintaining the original 425 acres within the CAP for the reasons stated above.

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Thank you for the opportunity to comment and participate in the public meeting.

Erin Allee
The Proebstel Neighborhood Association
(Also see Figure A-2 and A-3)

[Commenter: O-2]

3. *Safety of cleanup*

Comment

I-19-2

My second objection is that kids/people are going roam that area- fenced or not.

[Commenter: I-19]

I-21-1

I think the most important consideration regarding clean-up at the Camp Bonneville site is the safety of the future users of the area. If a decreased area of clean-up places people in danger of being injured then we should remain with the more comprehensive clean-up proposal even if it costs more.

[Commenter: I-21]

4. *Liability*

Comment

I-2-1

Short and sweet: I oppose any adoption which lessens or weakens the original cleanup mitigations. This is county property and the county will be liable for any injuries or death caused by overlooked munitions. Short cuts are not an option. Thank you for allowing me to comment.

[Commenter: I-2]

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5. *Community involvement*

Comment

I-20-3

Among the most important recommendations from these studies is the on-going inclusion of neighboring communities as stakeholders throughout the entire process. Having direct, on-going neighborhood involvement is the most effective means of assuring transparency and best possible future uses of BRAC properties given that permanent hazards that will remain on these sites.

[Commenter: I-20]

6. *Future land use*

Comment

I-7-1

I am retired from the United States Army and would love to see a National Cemetery (even a small one) built on the Western slopes of Camp Bonneville overlooking beautiful SW Washington where I could enjoy my final rest.

[Commenter: I-7]

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I-9-1

I'd like to part of it being used for STEM and Citizen studies, research and education.

Astronomy Park (dark skies area)

Biological / Nature / Environmental Teaching, studies and research

Area (s) for temporary projects requiring limited overnight stays (astronomy, STEM, conferences, outreaches)

Dedicated STEM and Teaching facility for community use with labs, classrooms, storage

Small Amphitheatre and/or facility for musical, arts and community use

Folklife, historical and cultural areas for educational, entertainment and community use

[Commenter: I-9]

I-11-1

I am interested in planning a place that: provides access to nature, offers local history, educational opportunities and protects natural resources. Create a welcome experience for all. Thank you.

[Commenter: I-11]

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O-1-2

Our primary questions related to this reduction are related to the probability of this area being open to the general public for future conservation uses as well as impacts to and from the surrounding residential developments.

[Commenter: O-1]

Appendix A

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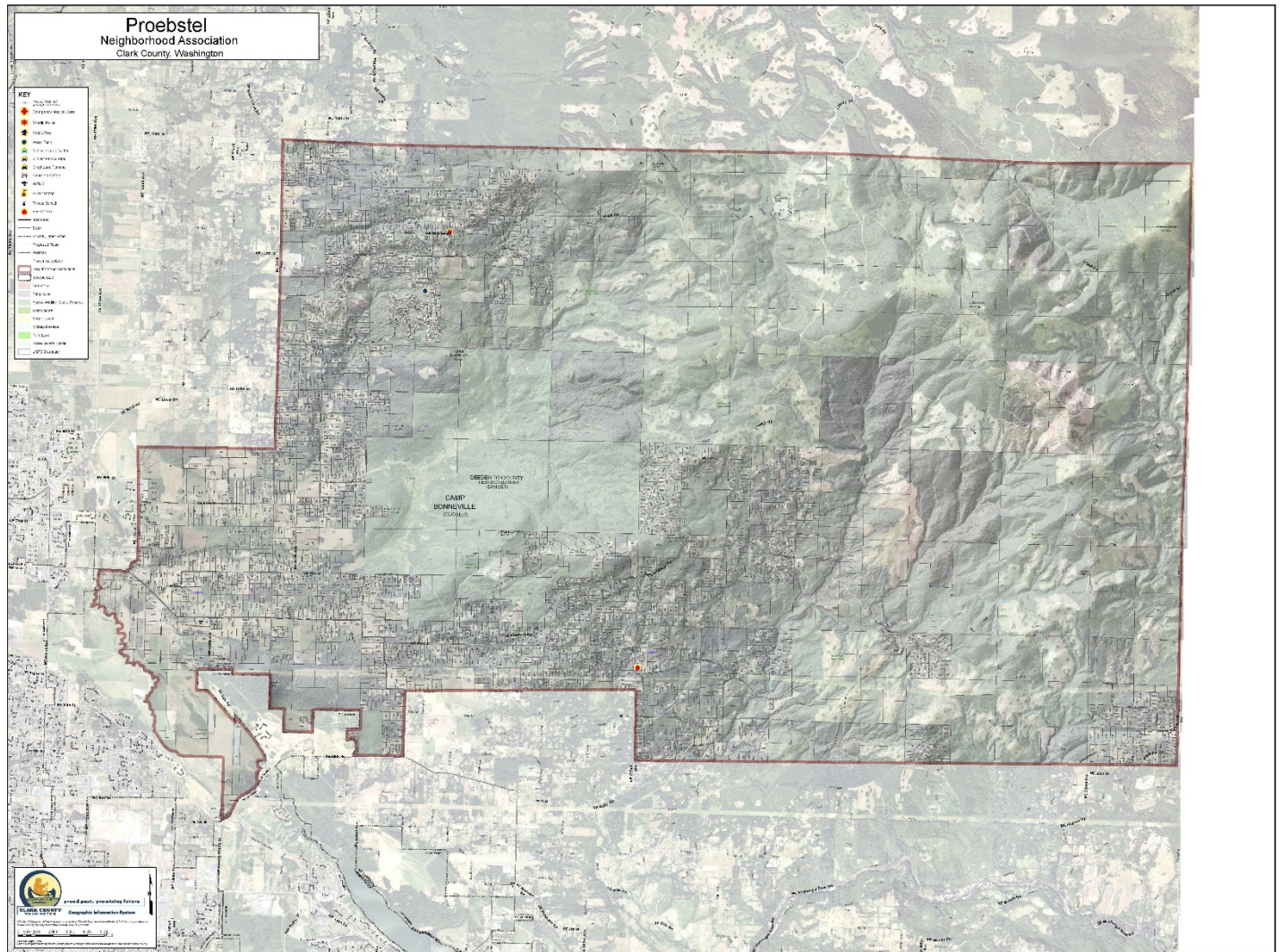


Figure A-1. Map provided in comment O-1. Proebstel Neighborhood Association map.

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Figure A-2. Map provided in comment O-2. Camp Bonneville reuse plan developed by Clark County.

Record of Comments received during the 2018/2019 Comment Period Regarding Cleanup of the RAU 3 - Western Slopes Area of Camp Bonneville.

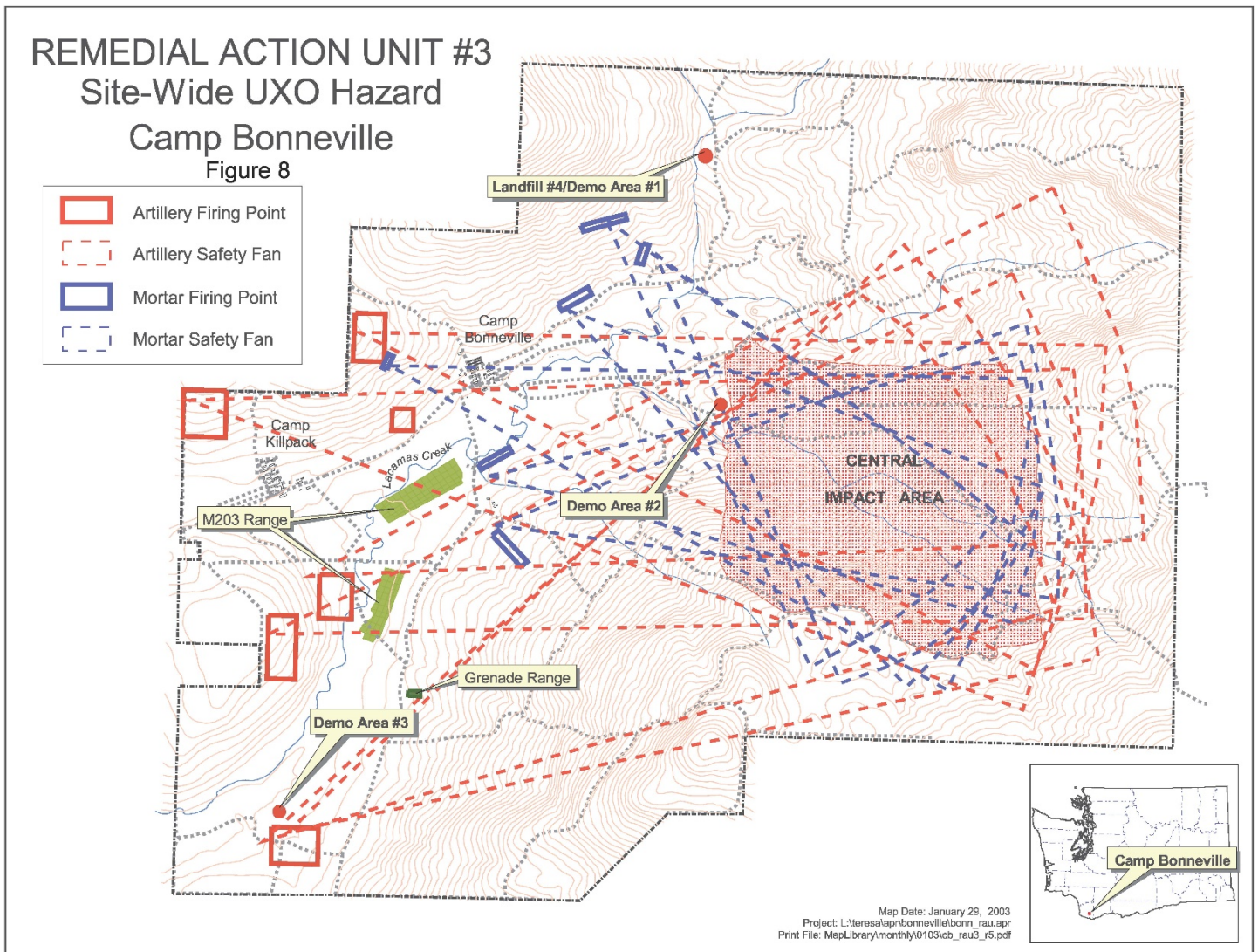


Figure A-3. Map provided in comment O-2. Camp Bonneville RAU 3 map.