Technical Assistance Services *for* Communities
Fort Ord Superfund Site Technical Comments

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Technical Comments on "Prescribed Burn 2013 After-Action Report"

Site Name: Fort Ord Superfund Site
Site Location: Monterey, California
Date: April 7, 2014

Section 1: Introduction

In March 2014, the U.S. Army completed the Prescribed Burn 2013 After-Action Report. Community members requested a review of the report by the U.S. Environmental Protection Agency's (EPA's) Technical Assistance Services for Communities (TASC) program. Independent technical and environmental consultants implement the TASC program. The report's contents do not necessarily reflect the policies, actions or positions of EPA. TASC has provided this summary and technical comments to community members in Monterey, California. Section 2 provides a section-by-section summary of the report with TASC technical comments throughout.

Section 2: Section-By-Section Summary

1. Introduction
Section 1 describes the purpose of using prescribed fire at the Fort Ord Superfund site. Past uses at Fort Ord resulted in munitions and explosives of concern (MEC) concealed by dense central maritime chaparral (CMC) vegetation. Prescribed fire removes the CMC vegetation to provide a safe environment in which to conduct MEC removal. Prescribed burning is also required for habitat management and helps prevent wildfires by reducing dangerous fire fuels.

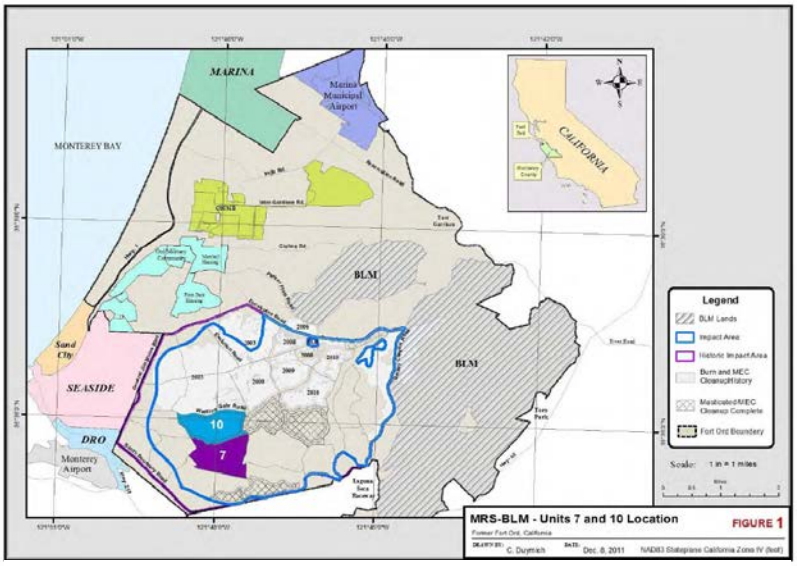

Figure 1: Location of Units 7 and 10 at Fort Ord site

2. Site Conditions
Section 2 describes the two areas burned. Unit 7 is 341 acres in size and is located in the southwest

quadrant of the impact area (an 8,000 acre firing range with unexploded ordnance, munitions and explosives of concern). Unit 10 is 327 acres in size and is also located in the southwest quadrant of the impact area. Figure 1 shows both areas. The report also explains the size of the buffer established for primary containment and the height of the vegetation on site.

3. Prescribed Burn Preparation
Section 3 describes the preparations undertaken to make sure the prescribed burn took place safely. This includes the different agencies and personnel involved during the planning and execution of the burn as well. California Department of Toxic Substances Control (DTSC) and Monterey Bay Unified Air Pollution Control District (MBUAPCD) personnel were on site during the burn, along with U.S. Army personnel and contractors.

This section also describes the burn strategy and safety guidelines followed. The section explains that a network of three containment lines allowed firefighters to stop fire at predetermined locations if a primary containment line was breached. The widths of the primary containment lines were set as minimum safety distances for firefighters based on the type of munitions used in each unit due to the possibility of flying fragments if a munition exploded during the fire. The tertiary containment lines were the impact area's asphalt perimeter roads. The secondary containment lines were set at a distance between the primary and tertiary containment lines.

Finally, the section describes additional activities necessary to enhance the containment line network and any additional issues identified and dealt with. These efforts included adding additional fuel breaks, masticating (using machines to chew up) sections of vegetation. Roads were inspected to make sure they were accessible by fire equipment. Some roads were watered down to maintain drivable roads during the burn. Water resources were put in place to control the fire and a helicopter base was prepared for the 2013 burn season.

4. Contingency Planning
Section 4 describes contingency plans prepared for the burn. Such plans are made in case something goes wrong. As part of the contingency planning, the Presidio of Monterey Fire Department (POMFD) arranged to have the Department of Forestry and Fire Protection (Cal Fire) engines staged along South Boundary Road during the burn.

5. Pre-Burn Coordination
Section 5 explains the coordination that takes place as part of a prescribed burn. This includes a weather assessment (for good smoke behavior and vegetation consumption), equipment mobilization, a temporary flight restriction, organization of burn resources, safety briefings and site security.

6. Burn Day 1: Unit 10
Section 6 describes the first burn day, October 14, 2013, the Unit 10 prescribed burn. This includes the meteorological call, the radiosonde launch, test burn, aerial ignition, surveillance and holding, smoke behavior, contingency and mop-up operations, and burn results.

<u>Meteorological Call – a Go/No Go</u>
The day started at 6 a.m. with a conference call including all parties involved in the burn, as follows:

- Meteorologists from the Naval Postgraduate School (NPS), the California Air Resources Board (CARB) and MBUAPCD
- Presidio of Monterey Fire Department Incident Commander (POMFD IC), the Fire Chief and Burn Boss
- Base Realignment and Closure (BRAC)
- United States Army Corp of Engineers (USACE)
- Prescribed Burn Manager
- Presidio of Monterey Police Department (POMPD)
- Presidio of Monterey Directorate of Emergency Services (DES)
- ITSI/Gilbane (project contractor)

Participants met to discuss the day's conditions and the appropriateness for a burn. All participants agreed with the forecast and agreed to recommend moving forward with the prescribed burn of Unit 10.

Radiosonde Launch

At about 8 a.m. two radiosondes (weather balloons with equipment to measure weather conditions) were launched near the burn location to provide real-time meteorological data to the Incident Commander. A technical malfunction prevented data from being electronically transmitted. However, the visual observation of the balloon path provided evidence of lack of a wind shear and good vertical lift.

TASC Comment:
Community members may want to ask the Army for an explanation of the steps that will be taken to make sure any future technical problems with radiosondes will be handled so that data collection is successful.

Test Burn

At 10:13 a.m. a test burn was started to validate meteorological conditions, smoke behavior and vegetation consumption. After favorable smoke behavior was observed, participants proceeded with full ignition of Unit 10. Because of the initial smoke from the test burn and initial plume, and the illusion that smoke might be touching down in neighboring City of Del Ray Oaks and upper Seaside, an off-site investigation was initiated. The investigation determined that the smoke was actually aloft and overhead, with no smell of smoke or visible ash.

Aerial Ignition, Surveillance and Holding

At 10:23 a.m. helicopters ignited the prescribed burn. Ground ignitions were also used, to try to burn mastication (mechanically chewed up vegetation) from the road. A malfunction in the gelled gasoline/diesel torch caused the ground-firing operations to cease for the day after about 20 minutes. In total, 45 percent of Unit 10's 87 acres of mastication burned.

A spot fire identified midway through the burn in the grassland of Unit 7 was extinguished quickly without incident.

Smoke Behavior

The smoke column was lofting 2,500 feet above ground level while the fire was being ignited. Later, at 1 p.m., low-lying smoke was observed moving southeast through Fort Ord, past Laguna Seca and along the Highway 68 corridor. By 4 p.m., the smoke had dissipated. Areas in the shadow of the plume may have experienced some ash fall and temporary shading from the smoke plume obscuring the sun. The report states that ash is made up of large particles that are not a health concern and that ash is an indicator of rapid consumption, which results in less smoldering.

> *TASC Comment:*
> Although ash from the prescribed burns is likely to be relatively nontoxic and similar to ash from a forest fire or your fireplace, any ash will contain small amounts of cancer-causing chemicals. In addition, fire ash may be irritating to the skin, especially to those with sensitive skin. If the ash is breathed in, it can be irritating to the nose and throat, and may cause coughing. Exposure to ash in air might trigger asthmatic attacks in people who already have asthma. Therefore, contact with ash from the prescribed burns should be avoided.

Contingency and Mop-Up Operations

The Unit 10 burn took place as planned. The Burn Boss used an infrared camera in the command helicopter to detect any hot spots, spot fires or slop-overs (heat and/or fire) outside the primary containment line and advised the Incident Commander if any direct responses were necessary. No fire foam or retardant was used on the Unit 10 burn.

Burn Results

The prescribed burn of Unit 10 met its major objectives: a successful burn without any fire escape, incident or injury to personnel, and with an overall consumption of 85 percent of the entire unit. The Unit 10 burn consumed 279 acres.

7. Burn Day 2: Unit 7

Section 7 describes the second burn day, October 15, 2013, the Unit 7 prescribed burn. This includes the meteorological call, the radiosonde launch, test burn, aerial ignition, surveillance and holding, spot fire, contingency action, smoke behavior, burn phase, smolder phase, mop-up operations, burn results and post-burn assessment of primary containment line breach.

Meteorological Call – a Go/No Go

At 6 a.m. a burn day Go/No Go decision conference call was conducted. All participants on the meteorological call agreed with the forecast and agreed to recommend moving forward with the prescribed burn of Unit 7. With the forecast calling for a warmer and drier day prior to the test burn, the Burn Boss instructed the suppression ships (helicopters) to create a wet line in the primary mastication (chewed-up vegetation) around Unit 7. The wet line assists with containment of the burn and reduces spot fires.

Radiosonde Launch

At 7:50, two additional radiosondes were launched. This time, data collection and transmission were successful and indicated that the weather conditions were in alignment with the forecast and good conditions for a burn.

Test Burn
At 9:27 a.m., a test burn was started in Unit 7. After favorable smoke behaviors, participants proceeded with the full ignition of Unit 7.

Aerial Ignition, Surveillance and Holding
At 9:30 a.m., helicopters ignited the prescribed burn. Aerial ignitions were also used to burn mastication around the primary containment line. The mastication lit earlier by ground-gelled gasoline/diesel torch burned well on its own. As the day went on and humidity lowered, the mastication burned strongly and became a concern. Resources focused on holding the burn on the southern boundary of Unit 7 along Phoenix Road and the eastern boundary along Evolution Road.

Spot Fire
With the active ignition period concluded, both wind speed and surface temperature increased slightly. Combined with a slight drop in relative humidity and a wind direction transition, this contributed to sudden spot fires in an adjacent unit to the south, estimated to begin around 12:00 to 12:15 p.m. Initial observations of the spot fires were delayed due to reduced visibility from smoke in the area. Ground crews attacked the fire from the road but some spot fires were at a distance from the road, making it difficult to reach them. The smoke that impeded the effectiveness of the suppression activities continued to allow the fire to progress uninterrupted. The fire ran south and east through Unit 33. It then became visible to the suppression helicopters, which proceeded with an aggressive attack. The on-site aerial and ground resources continued to work on the fire while backup assistance was called in.

Contingency Action
The spot fires had breached the primary containment line of Unit 7. Since the southeast side of Unit 7 is close to the southern boundary of the impact area, there was not enough space to create the two additional containment lines. Mastication of Units 4 and 6 took place before the burns to provide a wide buffer between the burn areas and nearby populations. The masticated areas would slow a fire down, allowing the suppression helicopters and crews to extinguish it. However, depending on fuel loading, humidity and wind, the buffer would not necessarily stop a fire. Although a significant containment line network was in place to maintain the burns within the impact area, the additional consumption would generate fire and smoke closer to smoke-sensitive receptors. At 12:25, the Incident Commander determined that a precautionary evacuation of York School was necessary.

As part of the contingency plan, Cal Fire Air Attack would be called when a fire reached a predetermined trigger point which occurred at 12:29 p.m. Cal Fire Air Attack used two S-2 air tankers to drop fire retardant. The retardant drops helped prevent further advancement of the fire. At about 1 p.m. the wind shifted from a north wind to a west wind. This pushed the fire east across Unit 33 and into masticated Units 4 and 6, which slowed the progression of the fire and shifted fire and smoke away from York School. The Incident Commander ordered the creation of a bulldozer blade line around the head of the fire to stop its forward progression. This effort, along with Cal Fire retardant drops, stopped the fire's forward progression at about 3:30 p.m. The area was patrolled overnight.

Smoke Behavior

The smoke column exhibited good structure during the ignition phase. When the continuous heat element of active firing is eliminated, the integrity of the vertical structure of the smoke column is affected. This caused the smoke to obscure visibility, preventing rapid detection of spot fires. Areas in the shadow of the plume may have experienced some ash fall and temporary shading from the smoke plume obscuring the sun. The report states that ash is made up of large particles that are not a health concern and that the presence of ash is an indicator of rapid consumption, which results in less smoldering.

TASC Comment:
Although ash from the prescribed burns is likely to be relatively nontoxic and similar to ash from a forest fire or your fireplace, any ash will contain small amounts of cancer-causing chemicals. In addition, fire ash may be irritating to the skin, especially to those with sensitive skin. If the ash is breathed in, it can be irritating to the nose and throat, and may cause coughing. Exposure to ash in air might trigger asthmatic attacks in people who already have asthma. Therefore, contact with ash from the prescribed burns should be avoided.

Burn Phase

The smoke behavior exhibited good structure during operations. After the active ignition phase of Unit 7, spot fires occurred, burning a portion of Unit 33 and later portions of units 4 and 6. This increased the amount of smoke by 100 acres of consumption. As the day progressed, the prescriptive conditions ended and the column slackened. In addition, as the fire was extinguished, the column structure was eliminated, turning the smoke into a smolder field that lasted for several hours, into the following day.

Smolder Phase

As fuel was reduced and the fire burned down, the smoldering phase began. Smoke wafted into low-lying areas and followed the terrain and direction of wind until the onshore flow (wind blowing from the ocean towards shore) blew it out of those areas. Because of the additional smoke generated from the breach into Unit 33, the Incident Commander and Burn Boss focused on ending the smoldering phase as quickly as possible. All helicopters converted to suppression ships as soon as the breach occurred and continued to function in a suppression capacity until they were released from the site. After the Unit 7 burn, MBUAPCD reported smoke along the Highway 68 corridor from the Laguna Seca to Toro Park and in areas of Carmel Valley and Seaside at night. The additional 100 acres burned at the end of the prescriptive day likely caused or contributed to the temporary smoke impacts experienced along Highway 68, Seaside and Carmel Valley.

Mop-Up and Patrol Operations

Upon completion of the burn of Unit 7 and additional burned areas, mop-up operations began. These operations continued until all hot spots were extinguished over the next two days.

Unit 33 Flare-Ups

Overnight patrol of units 7, 10 and 33 was provided; flare-ups are common in partially burned areas. Flare-ups in Unit 33 were visible from South Boundary Road, Ryan Ranch and residential communities south of South Boundary Road.

Burn Results

The prescribed burn of Unit 7 met its major objectives without injury to personnel and contained the burn within the containment line network even after a breach of the primary containment line occurred. The burn consumed 310 acres in Unit 7 which is an overall consumption of 91 percent of the entire unit.

TASC Comment:
The site's Record of Decision (ROD) that established the cleanup for the impact area states that the prescribed burns will be a series of small, 100-acre burns where feasible. However, burning up to 400 acres at one time is allowed. Burning is limited to no more than 800 acres per year. In two days, nearly 700 acres were burned in units 7, 10, 33, and parts of units 4 and 6. Community members may want to ask EPA and the Army to amend the ROD to limit burning to a lesser amount of acreage in a given time period. For example, the limit could be modified to allow burning of up to 200 acres at one time and no more than 400 acres in any week, and 800 acres in any year. This may help reduce the potential for smoke impacts on nearby communities.

Post-Burn Assessment of Primary Containment Line Breach

The Burn Boss and Incident Commander returned to the southern boundary of Unit 7 to investigate the origination of the spot fires into Unit 33. A shallow valley (draw) was observed in the southern part of Unit 7 and determined to more than likely funnel wind from the fire in Unit 7 across the mastication of the primary containment line, causing firebrands to blow onto Phoenix Road and into Unit 33. The Incident Commander and Burn Boss believe that additional mastication along the north boundary of Unit 33 could have prevented the extent of acreage consumed during the spot fires.

8. Lessons Learned

Some lessons considered for evaluation are:

1. Assess preparation activities in relation to mastication fuel loading. Historically, mastication has been difficult to burn. In 2013, partially due to the depth of the mastication from the heavy fuel loading of units 7 and 10, the mastication burned well unaided and with longer flame lengths. Considerations include:
    a. Investigate removing part of the duff (loose pieces of vegetation resulting from the mastication) from the primary containment as brush is masticated.
    b. Consider increasing mastication areas to include parts of adjacent units.
    c. Consider pretreatment of the containment line by burning the mastication simultaneously during active ignition or pretreat the adjacent mastication with water or fire foam.
2. Increase interoperability and functionality of radio systems by using very high frequency (VHF) radios.
3. Weather forecasting and mobilization determination went well.

4. Further increase habitat protection by making a stronger effort to brief contingency agencies on habitat precautions.

9. Resource Management Goals & Objectives
This section describes goals and objectives from the Prescribed Burn Plan and commentary from the Burn Boss. Most goals and objectives were met. The Burn Boss stated that "there are lessons learned in review to improve the process to help keep the burn within the primary containment line" and "discussions continue as to how to further reduce the amount of smoldering after the burn operations."

10. Meteorological Review
Section 10 describes burn day weather observations. Table 8 in the report shows the acceptable conditions for a burn and whether they were met or not. Although all conditions were met either completely or mostly, unfavorable temporary conditions did develop during the post-ignition smolder phase.

11. Conclusion
The Units 7 and 10 prescribed burns accomplished the overall goal of the Prescribed Burn Plan: to remove vegetation for the MEC cleanup program while minimizing smoke impacts on the community.

The air monitoring program identified concentration data for particulate matter less than or equal to 2.5 micrometers in diameter (PM2.5) above the 24-hour screening level at three monitoring locations on burn day 1 and at two monitoring locations on burn day 2. From a smoke management perspective, there were important lessons learned in relation to operations and minimizing smoke impacts. Any recommended changes will be evaluated for implementation in the burn program based on the complexity of the upcoming burns. Specifics that will be evaluated include unit size, vegetation density, terrain, smoke management, escape potential and the proximity to the community. Almost 700 acres were burned in the two-day prescribed burn operation.

TASC Comment:
The community may want to request verification that the Army will modify future prescribed burns based on the measurement of PM2.5 greater than the established screening level in monitoring locations.

Appendix A: Figures
Appendix A provides figures showing the location of units 7 and 10, additional mastication (chewed-up vegetation), dip points and containment lines, and total 2013 prescribed burn acreage consumption. In 2013, a total of 693 acres were burned in units 10, 7, 33, 4 and 6.

Appendix B: Photographs
Appendix B provides photographs from the burn days.

Appendix C: Burn Plan Checklists
Appendix C shows the burn plan checklists filled out and signed for both burn days.

Appendix D: Radiosonde Data
Appendix D shows radiosonde (weather balloon) data from October 15, 2013. Data from the October 14, 2013 radiosonde are not available because of a technical malfunction. A radiosonde is a piece of equipment used on weather balloons that measures atmospheric conditions and transmits them to a fixed receiver on the ground.

Appendix E: Lessons Learned
Appendix E describes the lessons learned as discussed at the October 28, 2013 meeting attended by all parties involved in the burns. Lessons learned areas include operations, smoke management, communications/coordination and safety. For smoke management, the recommendation is to reduce the risk of fire escape and/or shorten the smolder period by increasing the amount of ground suppression equipment on site during the burn.

Under communications/coordination, some recommendations relate to community outreach. These include: evaluate community outreach by providing timely and proactive information through social media; improve media, press releases and public information by having public affairs office personnel at the Incident Command Post during burns; and consider increasing community outreach to a larger area based on community response from previous burns.

Under safety, one recommendation is to increase the safety of local residents and project personnel by coordinating with local recreation groups to make sure they are alerted to burn events.

Appendix F: Air Monitoring Report
The Army conducted three 24-hour air sampling events on October 14, 15 and 16, 2013, for PM2.5. Concentration data was collected during the 24-hour sampling periods that included the active ignition phases of both prescribed burns. Air samples were collected from seven monitoring stations, including five predetermined sites and two sites selected the day before the prescribed burns. Figure 2 shows the locations of the stations.

In addition to the Army's air sampling for PM2.5, MBUAPCD also sampled the air at five locations during the prescribed burns, including one station co-located at Manzanita School (public station [PS]-2). MBUAPCD collected real-time data for PM2.5 using E-BAM™ samplers and made this information available to the public on its website (http://www.mbuapcd.org) during the burns.

The primary objectives of the sampling program were to: (1) provide data to assess the adequacy of the burn prescription relative to smoke dispersion and downwind effects; and (2) monitor and evaluate whether the prescribed burns result in downwind ambient concentrations of PM2.5 greater than the 35 micrograms per cubic meter ($\mu g/m^3$) screening level based on the U.S. EPA 24-hour National Ambient Air Quality Standard for PM2.5. There is no California 24-hour air quality standard for PM2.5.

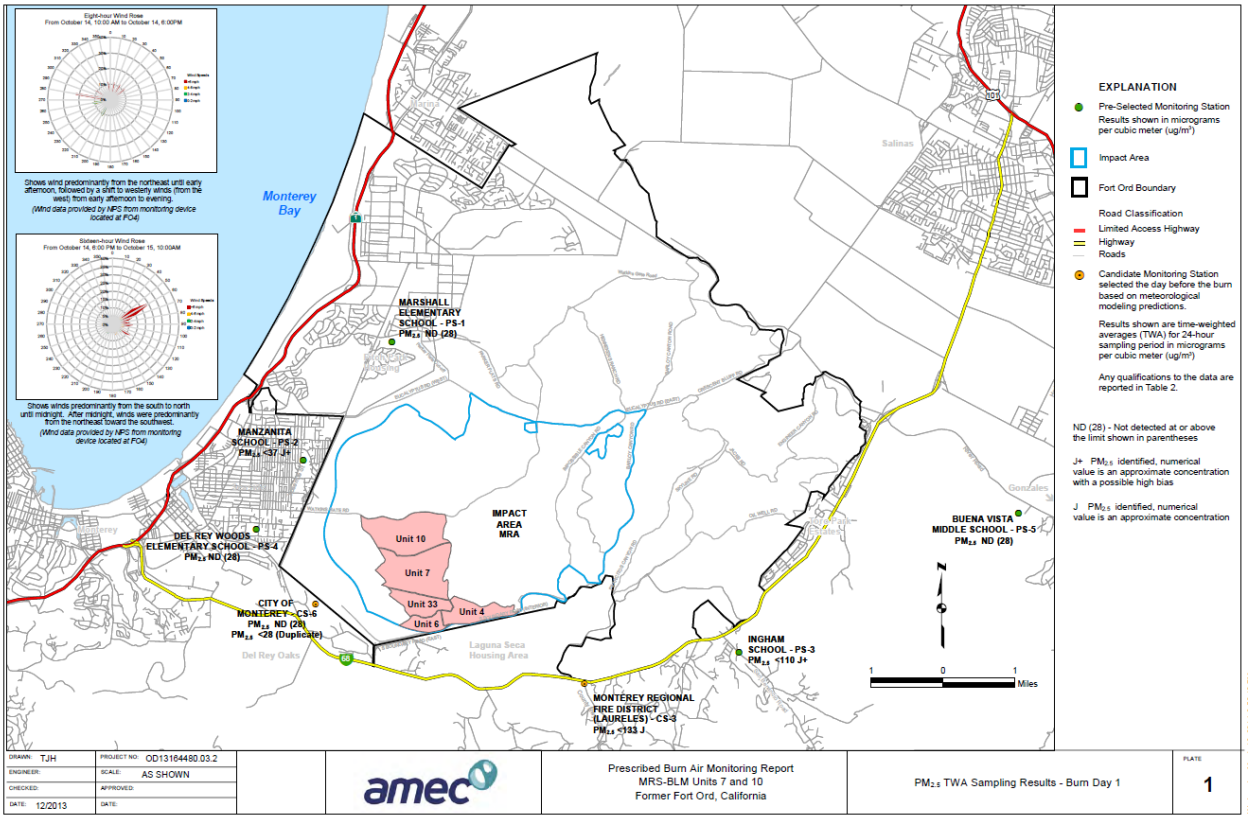

Figure 2. Air Monitoring Station Locations

The air sampling report states that PM2.5 was observed at or above the 24-hour screening level at three stations (Ingham School [PS-3], Manzanita School [PS-2] and Laureles Station [CS-3]) during the first burn day, and at two stations (Manzanita School [PS-2] and Marshall Elementary School [PS-1]) during the second burn day. No elevated 24-hour PM2.5 results were noted during October 16, 2013, the mop-up and patrol day, except in the duplicate sample from the City of Monterey Station (CS-6), where the 24-hour result equaled the screening level.

The first air sampling program during the site's 2003 prescribed burn included analysis for chemicals that could be present in smoke from burning of both vegetation and munitions constituents. Results of the 2003 sampling program showed that chemicals from munitions and explosives of concern were not present above health-based screening levels in samples collected downwind of the prescribed burn. The sampling report concluded that the best indicator of smoke at public receptors was particulate matter less than or equal to 10 microns (PM10).

For the Unit 7 and Unit 10 prescribed burns in October 2013, the Army decided to implement a PM2.5-based air monitoring program instead of the PM10-based program, considering the advice of MBUAPCD; comments from regulatory agencies and the public; and the opportunity to obtain information from the air monitoring program that could possibly lead to further improvements in the site's prescribed burn program.

Air samples from the monitors were collected eight hours after initiation of the burn and 16 hours after the first sample collection for each burn. This was done to prevent the collection

filters from becoming too full of particulate matter in the early hours of the burn. For the mop-up and patrol day, samples were collected from monitoring equipment after the full 24 hours.

Due to equipment failure, about two hours of air sampling time were lost during the eight-hour daytime sample at Laureles Station (CS-3) on October 14, 2013. Equipment failure also resulted in the loss of four hours, 36 minutes of sampling time at the City of Monterey (CS-6) duplicate station during the eight-hour daytime sample on October 15, 2013, and 65 to 70 minutes of sampling time from Manzanita School (PS-2). Although short periods of the 24-hour monitoring period were lost, concentration results were calculated using the actual total sample time to represent a 24-hour sample period. This resulted in conservative results for comparison to the 24-hour PM2.5 screening level.

Section 4.3.5 of the Air Monitoring Report states:

- If measured concentrations of PM2.5 in air are less than the established screening level, no modifications will be made to future prescribed burn operations.
- If measured concentrations of PM2.5 in air are greater than or equal to established screening level, then modifications to future prescribed burn operations will be evaluated.

Appendix G: Notification Plan After-Action Report

Appendix G is the Former Fort Ord After-Action Report: Notification Plan. It describes why prescribed burns are used at the site and the notification plan in place for the units 7 and 10 prescribed burn. It also determined if any changes should be incorporated into future prescribed burn notification program in the future.

The report also details the chronology of the prescribed burn notification program's outreach efforts, which included activities in February, March, April, May, June, July, August and September of 2012, and January, February, March, April, May, June, July, August and September of 2013. These activities included presentations to groups, classes, tours, orientations, letters, website updates, newspaper notices and information booths. It also lists outreach materials distributed and published in 2012 and 2013.

> *TASC Comment:*
> One of the lessons learned listed in Appendix E is: "The air monitoring units should get maintenance/servicing during off-season." TASC agrees.

Burn Hotline

There were a total of 722 phone calls to the hotline between October 12 and October 22, 2013. On October 15, 2013, 363 calls were received and the hotline operator responded to 85 calls. The report states that the hotline remains an effective tool for interested community members to find out the status of the prescribed burns and address questions to a hotline operator. No changes to the notification program hotline's operation are indicated in the report. The hotline number is 1-800-852-9699.

Website

The website (www.FortOrdCleanup.com) is maintained by the Fort Ord environmental cleanup project. During the burn season, updated messages were posted in the news section on the Web. Between October 12 and October 22, 2013, there were 4,225 visits to the website. The report states

that website updates are a fast and effective means to provide prescribed burn information to the community. No changes to the website element of the notification plan are indicated in the report.

Computerized Phone and Text Message System

On October 14, 2013, there were 504 people enrolled in the direct notification program. At the conclusion of burn season on October 22, 2013, 680 people were enrolled. The program has been active since 2006, when there was a high number of people (1,088) enrolled in the direct notification program. In 2011, there were only 51 people enrolled, but the burn was canceled. No changes to the computerized voice and text message element of the notification plan are indicated in the report.

Media

This section describes the types of media outreach conducted, including advertisements in multiple newspapers and languages. Media coverage occurred in June and October 2013 about the prescribed burns, with a Letter to the Editor in November 2013 stating that the Army's prescribed burns for 2013 were complete.

Based on review and analysis of the 2013 prescribed burn notification program, the program appears to be accomplishing the overall goal of providing prescribed burn information for mobilization, ignition and completion in a timely and an accessible manner.

TASC Comment:
The notification process appears to be very thorough. Community members may want to make suggestions about improving current communications associated with the burns or comments about specific groups, if any, that need additional information.

Appendix H: Site Security After-Action Report

This section describes site security – its purpose, responsibilities, planning and implementation. No major issues were described. Two trespassing incidents occurred on the controlled section of South Boundary Road. One was a resident with a camera. The other was a local biking group. The trespassers did not enter the site's exclusion zone (area where only essential personnel are permitted for safety reasons).

Section 3: Comments

The Army is receiving comments until close of business on April 29, 2014. Comments can be submitted in electronic format or by fax. They must be followed up with a hard copy sent through the U.S. Postal Service or hand delivered to the Fort Ord Administrative Record. All hardcopy comments must be received by close of business on the designated comment period deadline.

Mail to:

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P.O. Box 5008
Monterey, CA 93944-5008
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Hand deliver to:
Fort Ord Administrative Record
Building 4463
Gigling Road, Room 101
Ord Military Community, CA 93944-5004
Fax: 831-393-9186

TASC Comment:
If the community finds submitting hard copies of comments burdensome, it may want to ask the Army if the rules can be changed to allow electronic comments without hardcopy duplicates and to allow comments to be postmarked by the comment period deadline instead of received by the deadline.

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