## **Community Involvement Plan**

**FOR** 

#### **ENGINEERING EVALUATION/COST ANALYSIS**

 $\mathbf{AT}$ 

# ALDER CAMP ROAD FIRING RANGE REDWOOD NATIONAL PARK ORICK, CALIFORNIA

October 31, 2014





U.S. DEPARTMENT OF THE INTERIOR NATIONAL PARK SERVICE Pacific West Regional Office 333 Bush Street, Suite 500 San Francisco, California 94104

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# Community Involvement Plan National Park Service



Redwood National Park - Alder Camp Road Firing Range Engineering Evaluation/Cost Analysis

#### TABLE OF CONTENTS

1.0	INTRO	INTRODUCTION		
2.0	BACK	BACKGROUND		
	2.1 2.2	Site Location and Description  Operational History		
3.0	COM	MUNITY BACKGOUND	3-1	
	3.1 3.2 3.3	Community Profile	3-1	
4.0	COM	MUNITY INVOLVEMENT PROGRAM	4-1	
	4.1 4.2	Community Involvement Requirements  Communication Methods and Site-Specific Considerations		
5.0	REFE	RENCES	5-1	
	OF TA			
Table	e 3-1. Lo	ocal Demographic Information	3-1	
		IP Requirements under CERCLA and the NCPdministrative Record Information Repositories		
APP	ENDICI	ES		
APP]	ENDIX A	A FIGURES	A-2	
APP]	ENDIX I	3 CONTACT LIST	B-1	
APP	ENDIX (	C STAKEHOLDER OUESTIONNAIRE	C-1	

October 31, 2014 i



#### 1.0 INTRODUCTION

The National Park Service (NPS) is committed to encouraging public participation and providing opportunities for two-way communication between the agency and the public during environmental investigation and cleanup activities. This Community Involvement Plan (CIP) was developed to support the Engineering Evaluation and Cost Analysis (EE/CA) for the Alder Camp Road Firing Range located in the Redwood National Park (Site). The EE/CA is being conducted pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. §9601 *et seq.*, (Reference 1) to investigate potential environmental contamination and to evaluate a range of alternatives to address the contamination at the Site. This CIP has been prepared in accordance with Section 300.415(n)(4) of the National Contingency Plan (NCP) (Reference 2) at 40 Code of Federal Regulations (CFR) §300.415(n)(4), which requires that a CIP be prepared prior to completion of an EE/CA and in accord with EPA guidance for community involvement (Reference 3).

CERCLA, also known as the "Superfund" law, was enacted by Congress in 1980 to address releases of hazardous substances into the environment. Significant efforts have been made since then to locate, investigate, and clean up contaminated sites across the country. CERCLA gives the President broad powers to respond to releases and potential releases of hazardous substances, pollutants, or contaminants. The President delegates this authority to federal agencies. The NPS is the lead agency for the Site because the Site is located on land managed by the NPS. Any actions taken to address cleanup of this Site will be done with NPS funds.

The CIP serves as a guide for NPS to inform, include, and engage community members, environmental groups, government officials, the media, and other interested parties in the environmental assessment and cleanup activities at this Site. One key objective of the CIP is to describe the process for disseminating timely, accurate, meaningful, clear, and understandable information to the public. Another key objective is to describe the opportunities and methods by which the public may provide input to the EE/CA process. Strategies to accomplish these objectives take into consideration the specific circumstances of the Site.

A CERCLA Preliminary Assessment (PA), based on existing sample data and information, was completed for the Site in 2011. The NPS is conducting this EE/CA as the next step in the CERCLA process to determine whether a non-time-critical removal action to address metal contamination at the Site should be taken. The decision on what cleanup action, if any, is appropriate and necessary will be made in accordance with CERCLA requirements. A non-time critical removal at this site, if undertaken by NPS, will be carried out in accordance with CERCLA requirements. NPS personnel have indicated that no removal actions have occurred at the Site.

October 31, 2014



#### 2.0 BACKGROUND

The following subsections provide background information on the location, description, and operational history of the Site.

#### 2.1 Site Location and Description

Redwood National Park is one of four parks jointly managed by the NPS and the California Department of Parks and Recreation as Redwood National and State Parks. The Site is entirely within Redwood National Park and the EE/CA is being conducted solely by the NPS. The Site is located in Del Norte County, approximately 5 miles southwest of the town of Klamath, and approximately 19 miles north of the town of Orick in Humboldt County, off of U.S. Highway 101.

The Site coordinates are 41.51275° north (latitude) and -124.07571° west (longitude). The Site is located in an area of second growth forest. Access to the Site is via an unimproved road located off of Alder Camp Road. The road is closed to the general public and can only be accessed with NPS personnel escort. NPS still uses the Site as a firing range and does not intend to open up the area to public access.

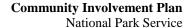
The dirt entrance road is approximately 0.1 mile and terminates at the firing range. The range is approximately 20 yards by 75 yards and comprises a cleared space within in an area of dense second growth forest. The range is a flat grassy area surrounded by alder, herbaceous plants, sword fern, salmonberry and other shrubs. There is a target line consisting of 12 targets at the northern end of the Site. The targets themselves are old pieces of old conveyor belts.

PVC piping was observed in the ground at different locations at the Site. The piping is used as fixed base supports for posts attached to barricades that NPS personnel stand behind during qualifying for a permit to carry a handgun. A shed, picnic table and old mailbox are located on the eastern side of the range. The shed is used to store the barricades and the mailbox itself is used as a barricade. Numerous shell casings were observed on the ground at the Site.

Appendix A includes figures depicting the Site, including Figure 1, *Site Location Map*, Figure 2, *Site Aerial Photograph*, and Figure 3, *Site Layout Map*, which are included in Appendix A.

#### 2.2 Operational History

The National Park Service has been managing Redwood National Park since 1968 and it has been reported that the Site was an established firing range at that time, according to NPS personnel, (Reference 4). Several NPS park rangers use the Site twice per year for permit qualifying. The Site was also occasionally used by personnel from other organizations (State Parks, BLM, and the Yurok Tribal Police) until 2012. The Site is currently active and is now used only by NPS staff.





Redwood National Park - Alder Camp Road Firing Range Engineering Evaluation/Cost Analysis

The NPS began phasing out the use of lead bullets in 2008 and NPS has prohibited the use of lead bullets since 2012. "Green bullets" are now used by NPS personnel. The term "green bullets" is a common name for a United States Department of Defense program to eliminate the use of hazardous materials from small arms ammunition and from small arms ammunition manufacturing. Initial objectives were elimination of ozone-depleting substances, volatile organic compounds and heavy metals from primers and projectiles.

19.1%

9.1%

3.7%

3.7%

10.5%

6.2%

1.3%

2.5%

#### 3.0 COMMUNITY BACKGOUND

#### 3.1 Community Profile

Redwood National Park is located about 19 miles north of Orick, California, in Del Norte County, California. Demographic information for Del Norte County and Humboldt County as shown on Table 3-1, is taken from the 2013 U.S. Census estimates (Reference 5).

**Del Norte** Humboldt **Demographic** County **County Total Population** 27,873 134,493 Population Under Age 18 21.3% 19.5% Population over Age 65 14.9% 14.8% Median Household Income (2008 – 2012) \$39,626 \$40,830 Age over 25 – Percent of High School Graduates 78.9% 90.3% Age over 25 – Percent with Bachelor Degree or Higher 13.8% 26.4% White 63.1% 76.2%

Table 3-1. Local Demographic Information

#### 3.2 Project History

Asian

Hispanic or Latino

American Indian or Alaska Native

Black or African American

Versar, Inc. performed a Preliminary Assessment (PA) for this Site in March 2011 (Reference 6), in accordance with the U.S. Environmental Protection Agency (EPA) *Guidance for Performing Preliminary Assessments under CERCLA (EPA/540/G-91/013)* (Reference 7). Versar contacted federal, state and local regulatory agencies and researched the Site online through agency databases. None of these agencies had permits, violations, or any other documents related to the Site. The PA recommended that a Site Inspection (SI) be conducted for the site. The PA report is part of the Administrative Record and is available for review at the Information Repository for the Redwood National Park EE/CA, as shown in Table 4-2.



#### 3.3 Key Community Concerns

The NPS understands that there is a general community concern that our national parks be maintained in a manner that supports the natural habitat; however, NPS staff is not aware of any specific concerns that the public may have regarding the Site at this time. The NPS welcomes any input that the general public or stakeholder organizations may offer to NPS to aid in the decision-making process.

The public will have the opportunity to be more informed about the environmental investigation and planned cleanup activities at the Site as the EE/CA proceeds. NPS has prepared a Fact Sheet related for this EE/CA. The Fact Sheet will be updated, as necessary, during the EE/CA process and is part of the Administrative Record file.

The NPS anticipates that one area of public concern that will be the native soil in which lead bullets have embedded to relatively shallow depths. Other heavy metals associated with shell casings have also been observed on top of the soil at the Site. Therefore, NPS has planned a thorough sampling campaign as part of this EE/CA to determine the nature and extent of heavy metals on or in the near-surface soils at the Site.

Versar completed a Sampling and Analysis Plan (SAP) in October 2014 (Reference 8) to address potential soil contamination with hazardous substances. This SAP, reviewed and approved by the NPS, is included in the Administrative Record for the Site. Soil will be sampled as part of this EE/CA to determine the level of metals contamination at the site.

Data from the soil analysis will provide key inputs for site characterization and decision making and will be incorporated into the EE/CA Report. The EE/CA Report will also include the identification and evaluation of appropriate removal action alternatives. The NPS will hold a formal 30-day public comment period on the EE/CA Report and the proposed actions and will issue a response to all significant comments received. The NPS will then issue its final decision regarding a non-time critical removal action at the Site through an Action Memorandum.



#### Redwood National Park - Alder Camp Road Firing Range Engineering Evaluation/Cost Analysis

#### 4.0 COMMUNITY INVOLVEMENT PROGRAM

The CIP supports the program to advocate and strengthen early and meaningful community participation during cleanup. This CIP identifies the processes to be used to engage in dialogue and collaboration with communities affected by the site.

#### 4.1 **Community Involvement Requirements**

It is important to tailor a CIP to particular community needs and situations because each CERCLA site is unique. Each CIP is also required by CERCLA and the NCP to include certain uniform elements. CIPs issued in the context of non-time-critical removal actions are required to include the actions shown in Table 4-1.

Table 4-2. CIP Requirements under CERCLA and the NCP.

Requirement	Requirement Source	Status (as of 10/29/14)
Establish Administrative Record file and Information Repository	NCP §300.415(n)(4)(i)	Initial Administrative Record (AR) File and Index have been established. Additional documents to be added as they become available. Information Repository will be at NPS office in Orick, CA and electronic access to the AR will be on NPS website (Reference 9):  www.parkplanning.nps.gov/RedwoodFiringRange
Publish notice of availability of Administrative Record file in major local newspaper	NCP §300.415(n)(4)(i)	Three newspapers have been identified and contacted (see Appendix B). NPS will publish notice as soon as hard copy and web-based AR files are available to public.
Conduct community interviews prior to completion of Community Involvement Plan	NCP §300.415(n)(4)(i)	Interested parties/stakeholders have been initially identified. EE/CA Fact Sheet and Stakeholder Questionnaire has been distributed and a Mailing List has been compiled.
Prepare Community Involvement Plan prior to completion of EE/CA	NCP §300.415(n)(4)(i)	CIP is complete and available as part of the AR File. CIP will be updated during the project, if necessary.
Establish agency spokesperson	NCP §300.415(n)(1)	Joseph Seney is the NPS spokesperson (see Section 4.2 and Appendix B).
Publish notice of availability and brief description of EE/CA in a major local newspaper	NCP §300.415(n)(4)(ii)	NPS will publish when EE/CA Report is ready for public review – expected in late April 2015. Three newspapers will publish the notice of availability (see Appendix B).



Requirement	Requirement Source	Status (as of 10/29/14)		
Public comment period for EE/CA- 30-day minimum	NCP §300.415(n)(4)(iii)	NPS will hold public comment period when EE/CA Report is ready for public review. Public comment period is expected to be during month of May 2015.		
Responsiveness Summary – prepare a written response to significant comments and make document available in the administrative record file	NCP §300.415(n)(4)(iv)	NPS will complete after the end of the public comment period. All public comments and the NPS responses to significant public comments will be placed in AR File.		

Table 4-2. CIP Requirements under CERCLA and the NCP.

#### 4.2 Communication Methods and Site-Specific Considerations

The key objectives of the Community Involvement Plan are to establish and encourage communication between NPS and the community and to provide opportunities for the public to provide input to the EE/CA. The following methods and activities will be used to promote public participation and establish the channels to provide timely information to interested citizens, agency staff, government officials, the media, and the community-at-large.

The community involvement program provides the following approaches:

- Contact County Officials. The Del Norte County Environmental Health Division in Crescent City, CA and the Humboldt County Environmental Health Department, Hazardous Materials Unit in Eureka, CA have been contacted regarding this EE/CA. Managers for both organizations have agreed to be a resource for this project and to stay informed in case citizens contact them regarding the EE/CA. The NPS will work closely with these county organizations regarding any removal action that may occur at the Site, including final transport and disposition of waste. A contact person for each county is listed in Appendix B.
- 2. Advise the General Public of the Project. A Fact Sheet regarding Site background and the possible need for cleanup has been developed by NPS. This Fact Sheet will be part of the EE/CA Administrative Record, updated as necessary, and will be made available at the Information Repositories. It will also be sent to known parties who have expressed an interest in this EE/CA, along with a Stakeholder Questionnaire (Appendix C). A mailing list of interested parties has been developed and each person on the list will be notified of significant events related to this EE/CA.

#### Community Involvement Plan National Park Service



Redwood National Park - Alder Camp Road Firing Range Engineering Evaluation/Cost Analysis

- 3. <u>Issue Public Notice.</u> The EE/CA Report, when available, will be provided to the public for a 30-day review period. Public notice of the availability of the EE/CA for review will be posted in the local newspaper, and on the NPS Planning, Environment, and Public Comment website (Reference 9). Public comments will be collected and responses will be provided by the NPS. All comments received and NPS responses will be placed in the Administrative Record for this EE/CA.
- 4. <u>Interview NPS Park Employees.</u> Stakeholder Questionnaires (see Appendix C) have been sent to nine NPS employees that were identified as persons with knowledge of the Site. NPS employees have been helpful in providing Site background information to support the PA and the EE/CA. A Fact Sheet has been sent to each of these individuals. Their continued involvement will be important in determining the appropriate course of action under this EE/CA.
- 5. Native American Tribes. The Yurok Tribe has been identified as a nearby tribe that has an interest in how cleanup at this Site is addressed. Tribal officials (Director, Watershed Department and Assistant Director, Environmental Programs, Pollution Prevention) have been contacted regarding this EE/CA and the background related to the firing range activities. These two individuals have elected to participate through the Stakeholder Questionnaire process and will be on the mailing list for this EE/CA. A Fact Sheet has been sent to them and NPS looks forward to receiving input from the tribe's perspective during the EE/CA process.
- 6. <u>Identification of Spokesperson</u>. The spokesperson for this project has been identified as Mr. Joseph Seney, at Redwood National Park. Mr. Seney's contact information is listed in Table 4.2.
- 7. <u>Maintain Administrative Record File in the Information Repository.</u> The Administrative Record file is housed in the Information Repository and contains all documents which NPS considers or relies upon in the remedy selection process. The Administrative Record file includes the Fact Sheet, Site reports (including this CIP) and other key documents related to this EE/CA.

Two locations for the Information Repository have been established. Hard copy information is available at the NPS office in Orick, California and the electronic information is available online at the NPS website, as shown on Table 4-2.



Redwood National Park - Alder Camp Road Firing Range Engineering Evaluation/Cost Analysis

Table 4-3. Administrative Record Information Repositories

Location		NPS Point of Contact
1.	National Park Service Redwood National Park South Operations Center 1212000 Highway 101 Orick, CA. 95555 Telephone: (831) 389-4286 Hours: Monday through Friday, 8:00 AM to 5:00 PM. Closed on federal holidays.	Mr. Joseph Seney Telephone: (707) 465-7704 Email: joe seney@nps.gov
2.	NPS Website for Planning, Environment, and Public Comment (PEPC):  www.parkplanning.nps.gov/RedwoodFiringRange	



#### 5.0 REFERENCES

- 1) Comprehensive Environmental Response, Compensation, and Liability Act of 1980, 42 U.S.C. §9601 *et seq* (2002).
- 2) Office of the Federal Register. 1994. *National Contingency Plan (NCP), 40 Code of Federal Regulations (CFR)* Part 300.
- 3) U.S. Environmental Protection Agency (EPA), 2005. *Superfund Community Involvement Handbook*. EPA 540-K-05-003
- 4) Jennifer Isaac, Environmental Scientist, Versar, Inc. Site reconnaissance conducted with Mike Sanders of NPS on September 30, 2010.
- 5) U.S. Census Bureau. *State and County Quick Facts*, Del Norte County, California <a href="http://quickfacts.census.gov/qfd/states/06/06015.html">http://quickfacts.census.gov/qfd/states/06/06015.html</a>. (website accessed October 14, 2014).
- 6) Versar, Inc. (Versar) 2011. Preliminary Assessment, Camp Alder Road Firing Range, Redwood National and State Parks, Alder Camp Road, Orick, California. Versar Project No. 104700.4929.041. March 1, 2011.
- 7) U.S. Environmental Protection Agency (EPA). 1991. *Guidance for Performing Preliminary Assessments under CERCLA*. EPA/540-G-91-013. September.
- 8) Versar, Inc. (Versar) 2014. Draft Sampling and Analysis Plan, Firing Range, Engineering Evaluation/Cost Analysis, Redwood National Park, Alder Camp Road, Orick, California. Versar Project No.112036.0004.001. October 3, 2014.
- 9) National Park Service (NPS). NPS Website for Planning, Environment, and Public Comment (PEPC). <a href="www.parkplanning.nps.gov/RedwoodFiringRange">www.parkplanning.nps.gov/RedwoodFiringRange</a>

### APPENDIX A FIGURES

These figures are shown on the following pages:

- Figure 1. Site Location Map
- Figure 2. Site Aerial Photograph
- Figure 3. Site Layout Map
- Figure 4. Photographic Log Eight Site Photos from September 29-30, 2014 Site Visit



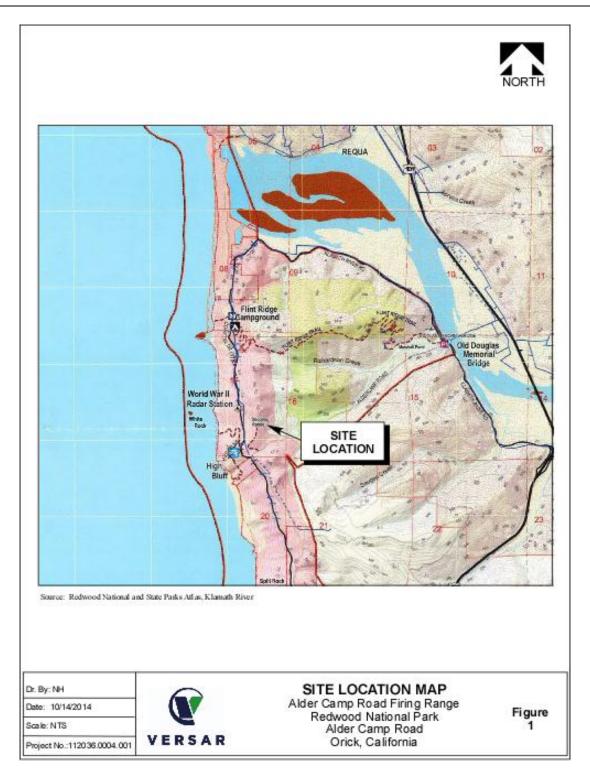


Figure 1. Site Location Map



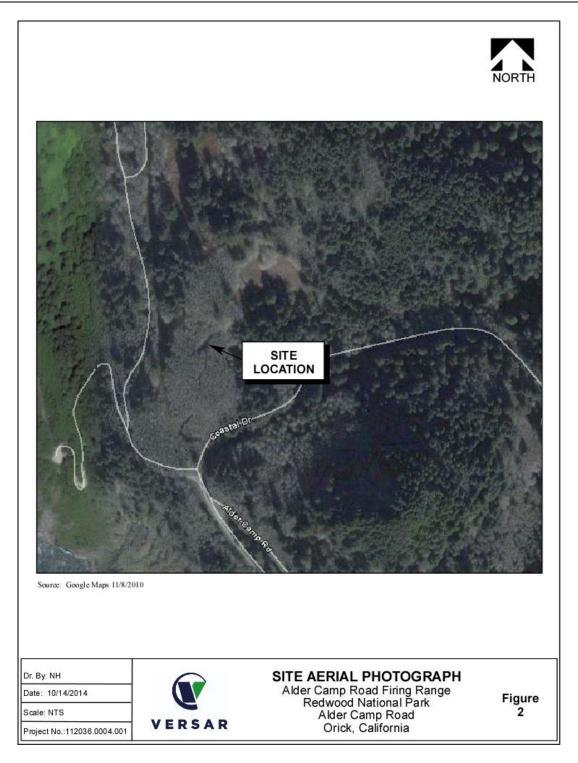
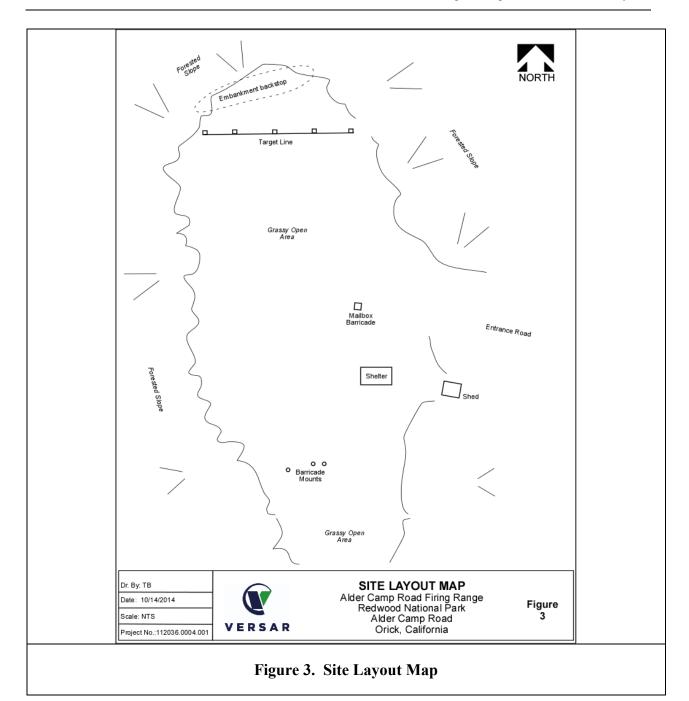


Figure 2. Site Aerial Photograph





A-4 October 31, 2014



#### Figure 4. Photographic Log

#### Photograph # 1

#### View:

Facing south

#### **Description:**

View of firing range from behind the target area.



#### Photograph # 2

#### View:

Facing northeast

#### **Description:**

View of the western edge embankment backstop behind target area.





#### Photograph # 3

#### View:

Facing north

#### **Description:**

Center view of the embankment backstop behind target area.



#### Photograph # 4

#### View:

Facing west

#### **Description:**

View of the firing range target area.





#### Photograph # 5

#### View:

Facing northwest



View of the firing range target area, previously unidentified firing line area and mailbox barricade.



#### Photograph # 6

#### View:

Facing west

#### **Description:**

View of the short firing line area, mailbox barricade and previously unidentified firing line area.





#### Photograph #7

#### View:

Facing south

#### **Description:**

View of barricade mounts/long firing line area.



#### Photograph #8

#### View:

Facing north

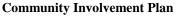
#### **Description:**

View from the long firing line area.





# APPENDIX B CONTACT LIST





#### **CONTACT LIST**

The individuals or organizations shown below may be contacted to obtain additional information about the National Park Service Alder Camp Road Firing Range EE/CA.

#### **National Park Service Officials**

Joseph Seney Redwood Naitonal Park 1212000 Highway 101 Orick, CA 95555 (707) 465-7704 joe\_seney@nps.gov Stephen Mitchell, P.E. National Park Service Pacific West Regional Office 333 Bush Street, Suite 500 San Francisco, California 94104 (415) 623-2286

stephen\_mitchell@nps.gov

#### **County Officials**

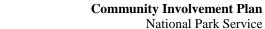
Brian McNally
Senior Environmental Health Specialist
Del Norte County
Community Development Department
Environmental Health Division
981 H. Street, Suite 110
Crescent City, CA 95531
(707) 465-0426
bmcnally@co.del-norte.ca.us

Larry Lancaster
Supervising Environmental Health Specialist
Humboldt County
Environmental Health Department
Hazardous Materials Unit
100 H Street, Suite 100
Eureka, CA 95501
(707) 445-6215
llancaster@co.humboldt.ca.us

#### **Yurok Tribe Officials**

Bill Patterson
Assistant Director
Environmental Program,
Pollution Prevention
Yurok Tribe
P.O. Box 1027
Klamath, CA 95548
(707) 482-1822, Ext. 1001
wpatterson@yuroktribe.nsn.us

Richard Nelson
Director, Watershed Department
Yurok Tribe
P.O. Box 1027
Klamath, CA 95548
(707) 482-0439, Ext. 1801
richard@yuroktribe.nsn.us





Redwood National Park - Alder Camp Road Firing Range Engineering Evaluation/Cost Analysis

#### **News Media**

Del Norte Triplicate 312 H Street P.O. Box 277 Crescent City, CA 95531(707) 464-2141 www.triplicate.com editorial@triplicate.com legal@triplicate.com Times Standard 930 6<sup>th</sup> Street Eureka, CA 95501 (707) 441-0500 www.times-standard.com editor@times-standard.com legals@times-standard.com North Coast Journal 310 F Street Eureka, CA 95501 (707) 442-1400 www.northcoastjournal.com newsroom@northcoastjournal.com



# APPENDIX C STAKEHOLDER QUESTIONNAIRE



Redwood National Park - Alder Camp Road Firing Range Engineering Evaluation/Cost Analysis

#### SITE STAKEHOLDER QUESTIONNAIRE

#### Redwood National Park, Orick, California Alder Camp Road Firing Range (Site) Engineer Evaluation/Cost Analysis

Nam	e: Date:
Title	: Organization:
1.	When and how did you first learn about the Site?
2.	What are your current concerns regarding the Site or the proposed cleanup?
3.	Do you have information about the Site which might help us in our cleanup?
4.	How would you rate the overall level of interest within this community (a) in environmental issues generally (b) in the Site activities? [On scale of 1 (low) to 5 (high)].
5.	How can the National Park Service best provide you information concerning the Site?
	(e.g. fact sheets, public meetings, website). How often would you like to receive information?
6.	Do you have any comments, suggestions, or recommendations regarding the Site cleanup?
7.	What contacts have you had with government personnel about the Site? Were the employees responsive to your inquiries?



#### **Community Involvement Plan**

National Park Service Redwood National Park - Alder Camp Road Firing Range Engineering Evaluation/Cost Analysis

8.	Who would you or your community call if you had questions about hazardous substance or chemical contamination?
9.	How would you prefer to be involved in future activities?
10.	Can you suggest other individuals or groups that should be contacted for additional information?
11.	Is the placement of Site related documents on the National Park Service internet web page for public viewing helpful?
12.	If you would like to be added to a mailing list for future updates on Site activities, please provide your mail and e-mail addresses.

Please return completed Questionnaire to either of the individuals shown below:

Joseph Seney National Park Service joe\_seney@nps.gov Paul Day
Patriot Technical Consultants
paul.day@patriot-technical.com