

# **Accelerating Munitions Response at Camp SLO, California**

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Camp San Luis Obispo (SLO), located on California's central coast, is known as the original home of the California National Guard. The Guard still operates a post there, but there is a 2101-acre Formerly Used Defense Site (FUDS), much of which served as a munitions impact range. That area, an idyllic patch of grassland in the coastal hills, hosted a twelve-acre "Classification Study" by the Defense Department's Environmental Security Technology Certification Program (ESTCP) in Spring 2009. Designed to improve the technical basis for decisions when and where to dig for unexploded ordnance, that study yielded impressive results.



**From a distance, the CAMP SLO impact area doesn't look very dangerous.**

In July, 2009 the Los Angeles District of the Army Corps of Engineers proposed a Time-Critical Removal Action (TCRA) that was to include a 200-acre surface ordnance clearance at Munitions Response Site 5 (MRS 5), where ESTCP had conducted its demonstration. California's Department of Toxic Substances Control (DTSC) quickly concurred. Next, the Corps' TCRA Review Board, made up of representatives of other Corps districts and the Huntsville-based munitions response Center of Excellence, rejected the proposal, proposing instead that the time-critical activity be limited to institutional controls (education and signage), and that the pending Remedial Investigation/Feasibility Study (RI/FS) be accelerated. DTSC was informed in November.

In late December, DTSC wrote the Corps, stating, “DTSC considers institutional controls to be an insufficient reduction of risk for MRS 5.” DTSC noted that several live ordnance items were found during the 2007 Site Inspection, and that the ESTCP study uncovered 26 munitions and explosives of concern (MEC), including unexploded mortars, rockets, and hand grenades. All explosive finds were on or near the surface. Further, the ESTCP study avoided a nine-acre target area where it found, during a 30-acre conventional geophysical survey, densities of geophysical anomalies too high to use for the classification study.

DTSC’s concern is based upon the easy access to the site, which is owned by Cal Poly San Luis Obispo, a branch of the California State University System. Though the main campus is located several miles away, DTSC reports, “The site is regularly accessed by Cal Poly staff and students. There are no access restrictions for Cal Poly staff and students to the site.”

When I visited Camp SLO a balmy afternoon earlier this month, I was surprised to see a big yellow school bus rolling down the access road, passing students walking home from a school situated just across a vale from the FUDS range. It turns out that San Luis Obispo County operates a K-12 alternative school at this location. If my web search was accurate, there are about 280 students. The cattle fencing and skeleton of a gate that “protect” the property do not seem sufficient to prevent access and encounters with munitions.



**The alternative school is ahead to the right.  
The impact area is beyond the gate, to the left.**

Ironically, the Corps' growing reliance on comprehensive RI/FSs comes in response to criticism—which I joined—that it relied too much on TCRAs, in which action is taken before documents are written. At Camp SLO's MRS 5, however, the need seems critical enough to take timely action. Besides, as DTSC points out, "The ESTCP study provides significantly more data than is typically collected during an RI/FS." DTSC agrees that an RI/FS is needed for the entire property, but it "does not agree more investigation is needed within the known MEC-contaminated area to warrant an immediate action."

Following my visit to Camp SLO, I asked Corps officials what their response was to the DTSC letter. It was encouraging to hear that the TCRA Review Board will re-evaluate the TCRA to consider, once again, surface removal of the areas believed to contain the most live ordnance.