U.S. Army Corps of Engineers, Formerly Used Defense Sites Program

Proposed Plan for the **Benedict Field Bombing Target**

Saint Croix, U.S. Virgin Islands

Formerly Used Defense Site Project Number: I02VI056401

July 2025

Text in bold italics indicates that a word/phrase is included in the glossary at the end of this Proposed Plan.

INTRODUCTION AND PURPOSE

The U.S. Army Corps of Engineers (USACE) is presenting this ***Proposed Plan*** to allow the public the opportunity to review and comment on the ***Preferred Alternative*** for the Benedict Field Bombing Target and to encourage community participation in the environmental remediation process. This ***Formerly Used Defense Site*** is located in the southern shore of Saint Croix, U.S. Virgin Islands (see Figure 1), about six miles from Frederiksted and nine miles from Christiansted. The site is mostly located on land (143.4 acres) with the southernmost portion (18.6 acres) extending into the Caribbean Sea. The U.S. Virgin Islands Port Authority owns the land area of the property and manages it as buffer area for the Henry E. Rohlsen Airport. The reasonably anticipated future land use is the same as the current use.

The purpose of a Proposed Plan is to facilitate public involvement in the remedial action decision selection process and provide the rationale for selecting the Preferred Alternative. This Proposed Plan provides a brief description of the ***Remedial Investigation,*** and the alternatives developed and evaluated in the ***Feasibility Study***. It also provides the basis for supporting the selection of the Preferred Alternative. USACE will select a final remedial action for the land and marine areas of the Benedict Field Bombing Target ***Munitions Response Site*** after reviewing and considering the information submitted during the public comment period. USACE may modify the Preferred Alternative or select another response action based on new information or public comments. Therefore, we encourage the public to review and comment on this Proposed Plan during the public comment period.

IMPORTANT INFORMATION

Public Comment Period
August 19, 2025 – September 29, 2025

USACE will accept comments on the Proposed Plan during the public comment period. Please submit your comments by calling 800.710.5184, emailing FUDS.Florida@usace.army.mil, or mailing them to the following address.

U.S. Army Corps of Engineers
Attention: FUDS Program (PMM-E)
701 San Marco Boulevard
Jacksonville, Florida 32207-8175

Comments received by 5:00 pm on September 29, 2025, or postmarked by that day, will be considered in the selection of the final remedial action decision.

Public Meeting
USACE will present the Proposed Plan at a virtual public meeting on August 19, 2025 at 6:00 pm. You can join the meeting by going to the project website listed below and clicking on the "Join Now" hyperlink.

Project documents are available at the following locations:

- Florence A. Williams Public Library
  1122 King Street
  Christiansted, Saint Croix, Virgin Islands
  00820
  Telephone: 340-773-5715
- USACE Jacksonville District Office
- www.saj.usace.army.mil/BenedictField

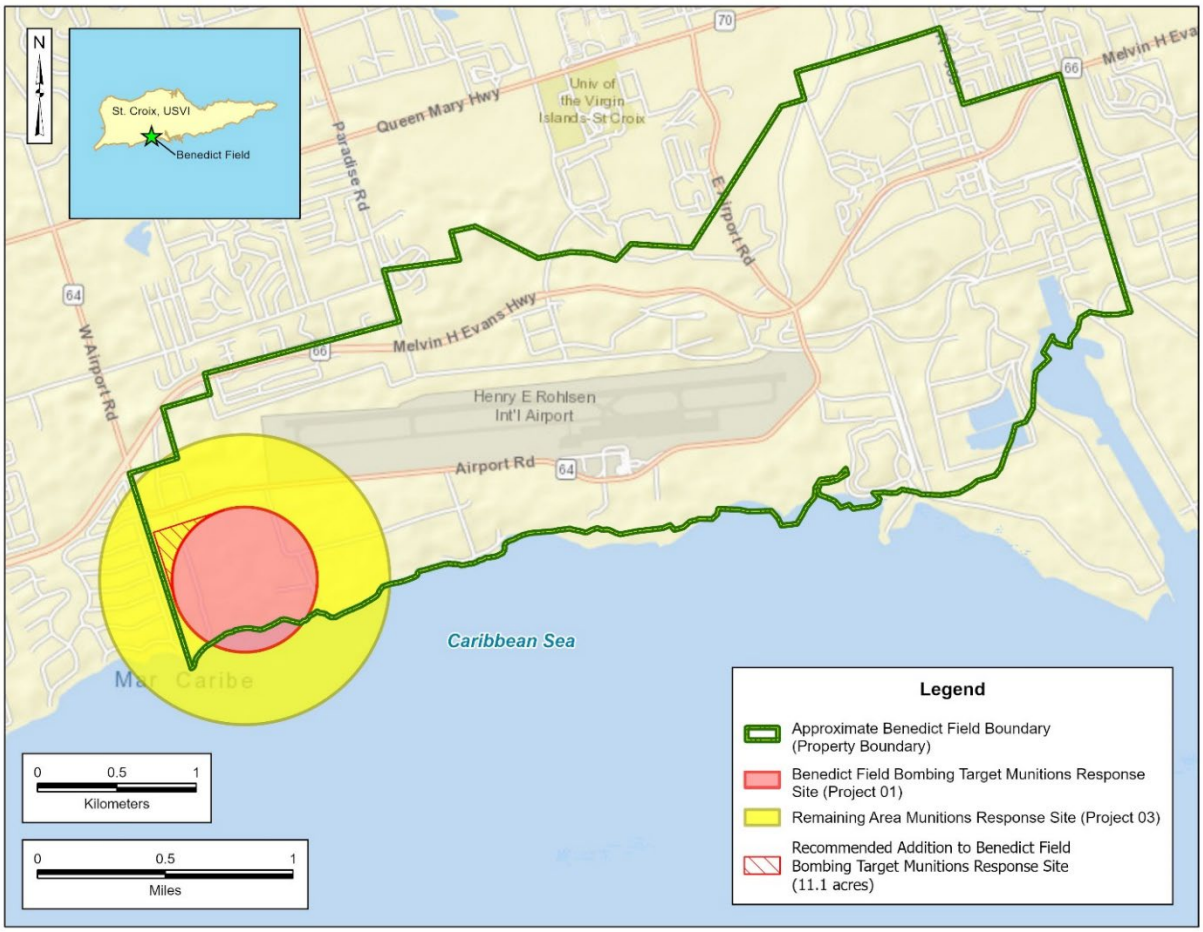

Figure 1: Benedict Field Bombing Target Location

Based on the findings of the previous studies and the Remedial Investigation, USACE has determined there is an unacceptable risk from exposure to ***munitions and explosives of concern***, referred to as munitions, within the land area of the Benedict Field Bombing Target. At the marine area of the site, there is no unacceptable risk to human health or the environment from exposure to munitions. There is also no unacceptable risk to human health or the environment from ***munitions constituents*** (the metals and explosives that comprise munitions) at the Benedict Field Bombing Target, both on land and in the marine areas. To address the risk determinations, USACE is proposing to expand the boundaries of the Benedict Field Bombing Target Munitions Response Site (USACE, 2024a and 2024b). The footprint for the Bombing Target Munitions Response Site would retain the original 162 acres plus 11.1 acres on land in the northwest corner formerly part of the Remaining Area Munitions Response Site, as shown in Figure 1. This Proposed Plan includes both the land and marine areas of the former bombing target.

USACE is required under the ***Comprehensive Environmental Response, Compensation, and Liability Act*** to issue this Proposed Plan and seek public comment and participation under Section 300.430(f)(2) of the ***National Oil and Hazardous Substances Pollution Contingency Plan***. The fieldwork for the Remedial Investigation was conducted from August through November of 2020 for the Benedict Field Bombing Target. The Remedial Investigation Report (USACE, 2024b) and the Feasibility Study Report (USACE, 2024a) form the basis for the Proposed Plan recommendation. This Proposed Plan summarizes information that can be found in greater detail in the reports and other project documents. These reports and other project documents are available for review in the ***Administrative Record*** File for this site, which is discussed below.

PUBLIC INVOLVEMENT PROCESS

Community members and other interested parties are encouraged to review this Proposed Plan and submit comments during the public comment period. USACE will consider the public comments on the Preferred Alternative before selecting a final remedial action decision for the land and marine areas at the Benedict Field Bombing Target Munitions Response Site.

The Army is the lead agency for the Formerly Used Defense Sites program. USACE, on behalf of the Army and the Department of Defense, is the executing agent for the program and is responsible for environmental restoration of properties that were formerly owned, leased, or otherwise possessed by the United States and under the jurisdiction of the Secretary of Defense. USACE is responsible for investigating, reporting, and implementing the remedial action decisions for the Benedict Field Bombing Target.

The U.S. Virgin Islands Department of Planning and Natural Resources is the regulatory agency for this project. Representatives from the agency reviewed the Remedial Investigation Report (USACE, 2024b) and Feasibility Study (USACE, 2024a) and agreed with the conclusions and recommendations.

The Remedial Investigation Report and Feasibility Study are part of the Administrative Record File that contains the documents used in making decisions for the Benedict Field Bombing Target. The Administrative Record File is available for review at the Florence A. Williams Public Library (1122 King Street, Christiansted, Saint Croix, U.S. Virgin Islands) and the USACE Jacksonville District office (701 San Marco Boulevard, Jacksonville, Florida). Documents are also posted on the project website (www.saj.usace.army.mil/BenedictField).

This Proposed Plan identifies and provides the basis for selection of the Preferred Alternative. The purposes of this Proposed Plan are to:

- Provide information about the site, its history, and current and anticipated future use;
- Identify and describe the Preferred Alternative and explain the reasons for the preference;
- Encourage public review and comment on the alternatives described;
- Provide information on how the public can be involved in the decision-making process.

USACE will present the final selected alternative in the ***Record of Decision*** document, and responses to public comments on this Proposed Plan will appear in the "Responsiveness Summary" section of the Record of Decision. The flow chart shown in Figure 2 summarizes the various steps in the development and approval process for the Record of Decision.

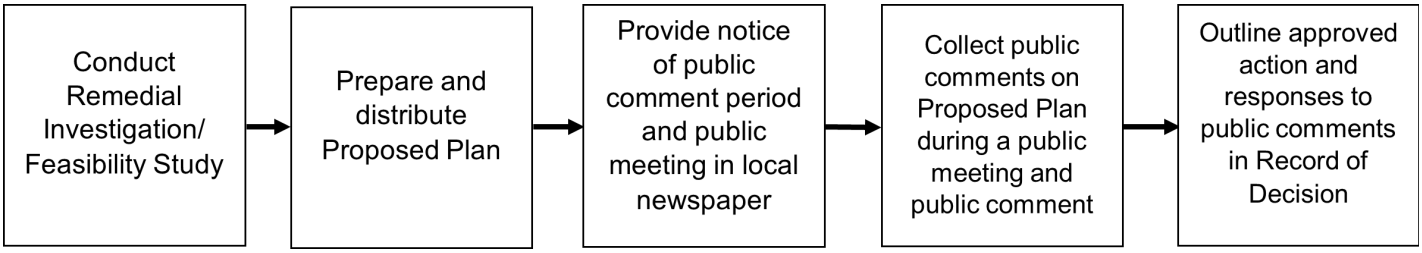

Figure 2: Public Participation Process

SITE BACKGROUND AND CHARACTERISTICS

Site History

The Benedict Field Bombing Target is a project within the larger Benedict Field Formerly Used Defense Site located in the southern shore of Saint Croix, U.S. Virgin Islands (see Figure 1). The original bombing target boundary occupied 143.4 acres on land with the southernmost portion (18.6 acres) extending into the Caribbean Sea (see Figure 3). The Army Air Forces used the site as a low-altitude practice dive bombing target between 1940 and 1947. Munitions used at the site include practice bombs with bomb signal cartridges and aircraft parachute flares. Following the end of World War II, the military no longer needed Benedict

Field, including the bombing target. In 1948, the federal government deeded most of the Benedict Field property to the municipality of Saint Croix while also returning a portion to the Department of Interior. The U.S. Virgin Islands Port Authority owns the land area of the former bombing target, which is currently a part of the airfield buffer area for the Henry E. Rohlsen Airport.

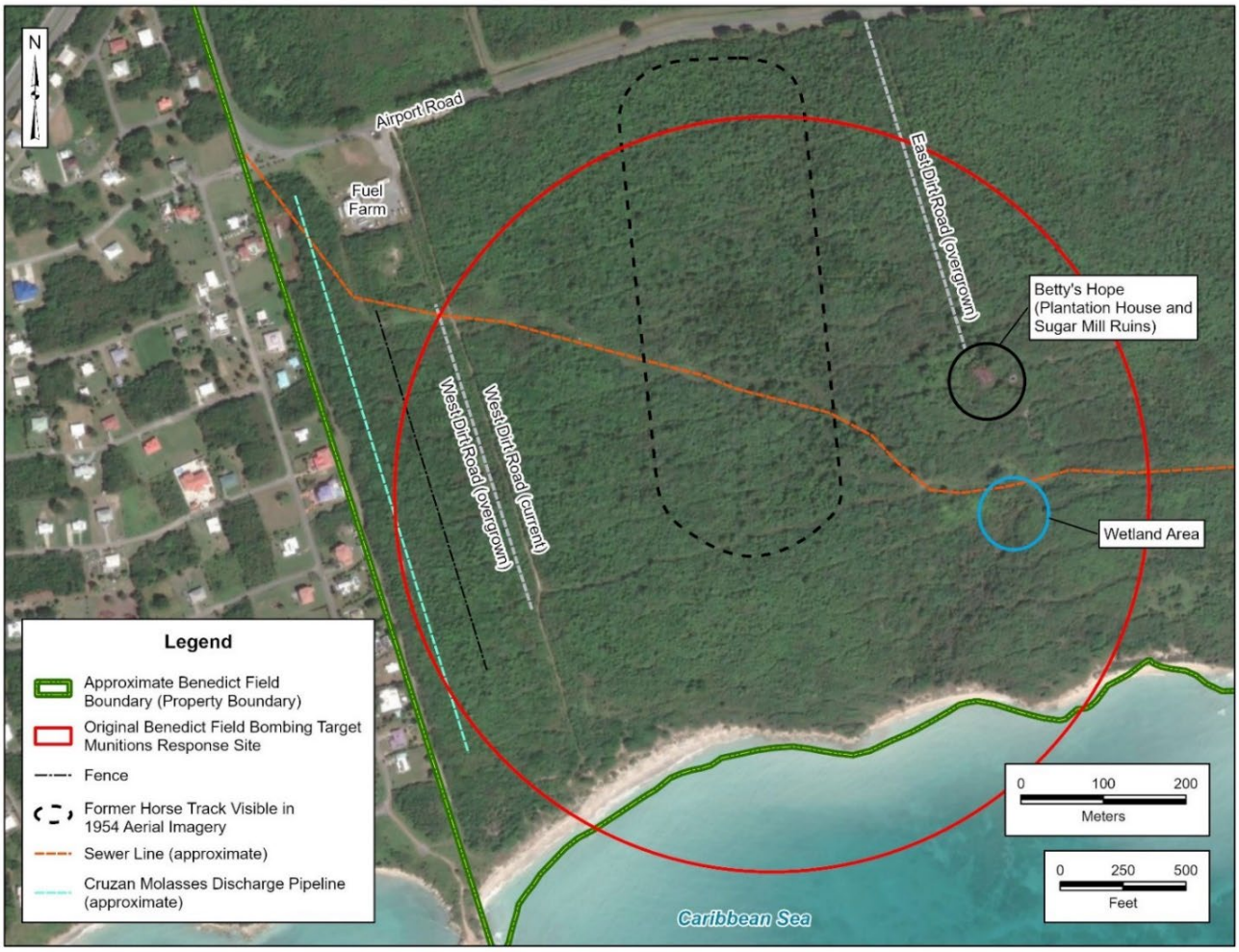

Figure 3: Site details at Benedict Field Bombing Target

The area where the site is located is not regularly maintained, is heavily vegetated, and partially fenced. Activities at the site are infrequent and limited to repairs, replacement, and additions to roadways and utilities as well as archeological studies and natural resource surveys. The eastern road at the site leads to the ruins associated with Betty's Hope (i.e., the ruins of a former sugar mill and plantation house), where it is mostly overgrown with vegetation. The western road is partly overgrown and leads to the beach. Public access to the beach must be maintained, but visitors are not a common occurrence. The area is also used as an unauthorized dump for household rubbish and other discarded items. Although a small portion of the site extends into the Caribbean Sea, this area is shallow and has limited visibility because of the sandy bottom and dynamic marine environment, making it less desirable for wading, swimming, diving, fishing, and boating than other areas along the coast of Saint Croix. Due to the historical use at the site, the buried utilities at the site, and the cultural and coastal resources present at the site, development to the east of the Munitions Response Site (not within the former bombing target) is more feasible. Thus, at this time, land use at the site is not reasonably anticipated to change.

Previous Studies and Investigations

USACE completed a series of studies and investigations at the site to determine the potential presence of munitions and munitions constituents following the Comprehensive Environmental Response, Compensation, and Liability Act process, including the following.

- *Inventory Project Report* (*USACE, 2003*) – This document recommended USACE conduct more extensive research to determine if an ordnance project was warranted.
- *Preliminary Assessment (USACE, 2006)* – The ***Preliminary Assessment*** compiled information obtained through historical research, property visits, and interviews. USACE utilized the data to develop recommendations for further action.
- *Archives Search Report Supplement (USACE, 2008)* – The ***Archives Search Report*** Supplement specified the size and location of Munitions Response Sites within Benedict Field.
- *Site Inspection Report (USACE, 2011)* – USACE found a piece of ***munitions debris*** during the ***Site Inspection*** site visit, and the report recommended a Remedial Investigation.
- *Revised Inventory Project Report (USACE, 2013)* – Based on the Site Inspection Report findings, this document divided the former Benedict Field into two areas: a 649-acre Bombing Target (Project 01) and a 1,259-acre Rifle Range (Project 02). Site Inspection Report recommended no further action for the Rifle Range and is not a part of this Proposed Plan.
- *Inventory Project Report Amendment (USACE, 2018)* – The revised Inventory Project Report delineated the original 649-acre bombing target into two separate sites: a 162-acre Benedict Field Bombing Target (Project 01) and a 487-acre Remaining Area (Project 03). The Remaining Area was recommended for no further action and is not a part of this Proposed Plan.

Remedial Investigation/Feasibility Study

Based on recommendations from the Site Inspection Report and additional historical information, USACE conducted a Remedial Investigation at the Benedict Field Bombing Target from 22 August through 24 November 2020. The purpose of the Remedial Investigation was to search for potential munitions and then determine the nature (i.e., type) and extent (i.e., how much and where) of munitions to better understand the potential hazards and risks associated with the site's former use as a bombing target.

The investigation focused on determining the types and concentrations of munitions on land and in the water within the areas associated with the former bombing target. USACE collected data over approximately 3.04 acres in the land area (i.e., soil) and 0.7 acres in the marine area (i.e., sediment). The team investigated 1,244 target locations on land. Most of the items found on land were non-munitions related scrap metal. The team did not recover any munitions on land, but a limited number of munitions debris items were found in soil including 11 pieces of munitions debris related to miniature practice bombs, one possible firing pin for a 100-pound practice bomb, and one iron solid shot cannonball; however, the cannonball is not associated with bombing target use (See Figure 4). USACE coordinated with the State Historic Preservation Officer in St. Croix during the Remedial Investigation field activities regarding the cannonball. It was determined to be associated with the period of time when the sugar plantation was active and when cannons would have been used to defend the plantation from pirates. The miniature practice bombs that were found no longer contained signal cartridges; however, they were designed to have signal cartridges. If intact munitions containing a signal cartridge or spotting charge (for the practice bombs) remained at the site, those would represent an ***explosive hazard***. The munitions debris recovered in the land area were found at depths ranging from 0 to 14 inches below the ground surface, mostly within the orange area shown in Figure 4. The team investigated 25 target locations in the marine area and no munitions or munitions debris was recovered in this area. The munitions debris, which are solid pieces of metal and do not present an explosive hazard, confirm the historical use of the site as a low-altitude practice bombing target and the types of munitions used.

The Remedial Investigation evaluated potential risk to human health and the environment. The location and position of the munitions debris suggests they were moved from their original location and aggregated at the convergence of the roads. Based on the Remedial Investigation fieldwork results, soil and sediment sampling was not needed, and there is no risk to human health or the environment from munitions constituents.

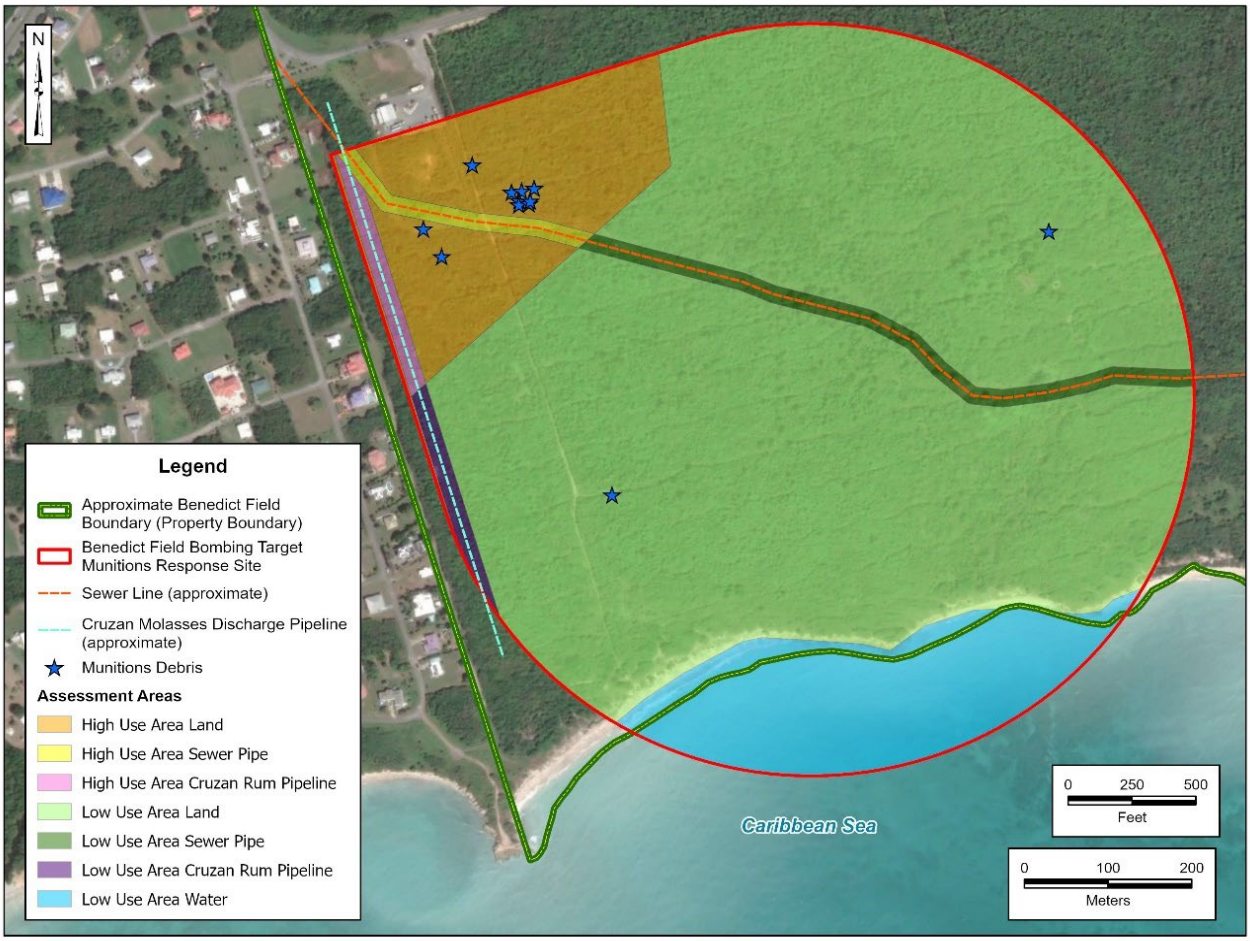

Figure 4: Benedict Field Bombing Target Assessment Areas

USACE is proposing to expand the project boundaries based on the Remedial Investigation results. The footprint for the Bombing Target Munitions Response Site would retain the original 162 acres plus 11.1 acres on land in the northwest corner formerly part of the Remaining Area Munitions Response Site (Figure 1). USACE completed a Feasibility Study to evaluate alternatives to address the potential risks on land. No cleanup has occurred at the site to date, only investigations and studies.

SCOPE AND ROLE OF THE RESPONSE ACTION

The overall remedial strategy for the Benedict Field Bombing Target is to eliminate unacceptable risks to human health and the environment due to the military's past use of the site. A response action is required for the land area of the former bomb target. Methods to reduce interactions with munitions include ***land use controls*** (e.g., signage, use restrictions, and public awareness) and surface and subsurface munitions removals. Because there is no unacceptable risk from munitions in the marine area, no response action is required for that area. There is no evidence of munitions constituents at the site, and no response action is required related to munitions constituents.

SUMMARY OF SITE RISKS

USACE completed risk assessments to determine the potential risk to human health and the environment. Hazards and risks were evaluated based on the potential for people and the environment to be exposed to munitions and munitions constituents. The potentially exposed population includes all those who work or visit the area within the red circle shown on Figure 4.

Based on the Remedial Investigation, there is no unacceptable risk from munitions constituents to human health or the environment attributable to the Department of Defense's former use of the site.

For the marine area, there is no unacceptable risk from munitions to human health or the environment attributable to the Department of Defense's past use of the marine area at the site.

For the land area, there is an unacceptable risk to human health or the environment from exposure to potential munitions that may still remain within the land area of the former bombing target.

The U.S. Virgin Islands Department of Planning and Natural Resources and the U.S. Virgin Islands Port Authority agreed with the risk assessment conclusions.

REMEDIAL ACTION OBJECTIVE

For the marine area, since no remedial action is required, there is no ***remedial action objective***.

For the land area, the remedial action objective focuses on limiting human exposure and interaction with potential munitions, including practice bombs within the surface and subsurface soil to a maximum depth below the surface as listed in Table 1 such that the risk relating to munitions is determined to be acceptable based on USACE's risk methodology tool.

Table 1: Maximum Depth by Assessment Area

Assessment Area	Maximum Depth (feet)
High Use Area[1] Land	2
Low Use Area[2] Land	4
High and Low Use Areas Cruzan Rum Pipeline	10
High and Low Use Areas Sewer Pipe	20

Notes:

1. High Use Area - an area where evidence of munitions use has been confirmed based on documented historical information and previous and/or current investigation results, and where the potential presence of munitions is anticipated.
2. Low Use Area - an area where the potential presence of munitions cannot be ruled out based on findings from current and/or previous investigations.

This remedial action objective applies to current and anticipated future users of the land area (i.e., current and future U.S. Virgin Islands Port Authority personnel and contractors [e.g., security and general site visits, maintenance], Saint Croix Fuel Services personnel and contractors, other agency personnel [e.g., Waste Management Authority and U.S. Virgin Islands Department of Planning and Natural Resources] and contractors, Cruzan Rum Distillery personnel and contractors, visitors, and trespassers). The site is in an area that is not regularly maintained and is heavily vegetated; ***intrusive activities*** are limited to repairs, replacement, and additions to utilities (maximum 20 feet deep). The area is also used as an unauthorized dump for household rubbish and other discarded items. The remediation goal for the land area is to limit people from having intentional or unintentional interactions with munitions. (USACE, 2024a)

SUMMARY OF ALTERNATIVES

The Preferred Alternative for the marine area is ***No Action.*** USACE did not develop or evaluate other alternatives for this area of the site because there is no unacceptable risk to human health or the environment attributable to the Department of Defense's former use of the site. This alternative means that USACE will not take any action, and if the Preferred Alternative of No Action is implemented, the use of the marine area of the site will continue in its current condition.

The Preferred Alternative for the land area is Land Use Controls. For the Benedict Field Bombing Target land area, USACE developed and analyzed five alternatives as part of the Feasibility Study to offer a range of remedial approaches due to the unacceptable risk from munitions potentially remaining on land. They are listed below and detailed in the sections that follow.

- Alternative 1: No Action
- Alternative 2: Land Use Controls
- Alternative 3: Focused Surface and Subsurface Removal on High Use Area with Land Use Controls
- Alternative 4: Focused Surface and Subsurface Removal on High Use Area, Roadways, and the Beach with Land Use Controls
- Alternative 5: Complete Surface and Subsurface Removal

Alternative 1: No Action

The No Action alternative involves USACE taking no actions to locate, remove, dispose, or limit the exposure to potential munitions that may remain at the site. Under this alternative, no munitions-related items would be removed, and USACE would not provide any further public awareness.

Alternative 2: Land Use Controls

Under Alternative 2, land use controls would be used to limit access and provide public awareness about the former training activities (as shown in Figure 5). Controls implemented would include USACE installing fencing along the western road from Airport Road to the beach on both sides and along the eastern road from Airport Road to the plantation area, also on both sides. USACE would also install three gates at the following locations.

- Northern end of western road; would still allow pedestrian access to the beach, but prevent unauthorized vehicle access.
- Northern end of eastern road; would still allow pedestrian access to the beach, but prevent unauthorized vehicle access.
- Entrance to utility corridor from western road (no pedestrian access allowed; only for authorized utility workers and contractors).

The gates and fences will direct pedestrians away from/limit access to the areas where munitions may be present. USACE would also install six signs that provide information on the military's historical use and noting that munitions may remain from those training activities. These signs would be installed as follows: one at each of the three gates, one at the fuel farm, and two on the beach. In addition, USACE would conduct annual reviews to ensure personnel planning to do intrusive work at the site are aware of the site history and potential presence of munitions as well as the safety precautions needed to prevent interactions with munitions. The annual reviews would be conducted remotely and would focus on determining if there are upcoming maintenance or construction projects planned at the site (i.e., pipelines). The reviews would involve contacting the following entities: U.S. Virgin Islands Department of Planning and Natural Resources and Waste Management Authority, U.S. Virgin Islands Port Authority, Cruzan Rum, and the current operator of the fuel transportation company. If the annual review finds that intrusive activities are planned, USACE will make sure that public awareness materials are available for those doing intrusive activities and will reassess the selected remedy and determine if the Record Of Decision needs to be amended, an Explanation of

Significant Differences needs to occur, or a Memorandum for the Record is required. Administrative controls would also include public awareness materials, which will be provided to the U.S. Virgin Islands Port Authority and the U.S. Virgin Islands Department of Planning and Natural Resources and posted on the USACE project website. ***Long-Term management*** would be required to ensure land use controls remain in place. ***Five Year Reviews***, while not part of the remedy, would be statutorily required to evaluate the ongoing protectiveness of the remedy because the alternative does not achieve conditions that allow for unlimited use and unrestricted exposure.

Alternative 3: Focused Surface and Subsurface Removal on High Use Area with Land Use Controls

Alternative 3 involves searching for and removing munitions over 100% of the High Use Area (18.39 acres) to a depth of two feet below the ground surface. Additionally, land use controls (fencing, gates, and signs), as detailed in Alternative 2, would be implemented at the site. Five Year Reviews, while not part of the remedy, would be statutorily required to evaluate the ongoing protectiveness of the remedy because the alternative does not achieve conditions that allow for unlimited use and unrestricted exposure.

Alternative 4: Focused Surface and Subsurface Removal on High Use Area, Roadways, and the Beach with Land Use Controls

Alternative 4 involves searching for and removing munitions over 100% of the High Use Area (Alternative 3) as well as the roadways and the beach area, which are areas where receptors are most likely to encounter potential munitions. The total removal acreage would be 21.5 acres. The removal would occur to a depth of two feet below the ground surface at the High Use Area and along the roadways while the removal on the beach would be to a depth of four feet below the ground surface. Additionally, land use controls (fencing, gates, and signs), as detailed in Alternative 2, would be implemented at the site. Five Year Reviews, while not part of the remedy, would be statutorily required to evaluate the ongoing protectiveness of the remedy because the alternative does not achieve conditions that allow for unlimited use and unrestricted exposure.

Alternative 5: Complete Surface and Subsurface Removal

Alternative 5 involves searching for and removing munitions over 100 percent of the land area (154.5 acres) to the following maximum depth below the ground surface by assessment area: High Use Area (2 feet), Low Use Area (4 feet), High and Low Use Areas Cruzan Rum Pipeline (10 feet), and High and Low Use Areas Sewer Pipe (20 feet). At the locations of the two pipelines, due to the depths involved, the intrusive investigation will occur in 2-foot lifts with soil screening on tarps. A long-arm excavator would be used for this purpose. Following this work, the potential risk of encountering munitions would be negligible, so land use controls would not be necessary (no fencing, gates, or signs).

EVALUATION OF ALTERNATIVES

Since unacceptable risks to human health and the environment were identified for the Benedict Field Bombing Target land area, the alternatives were further evaluated. Section 300.430 (e)(9)(iii) of the National Oil and Hazardous Substances Pollution Contingency Plan describes nine criteria for evaluating and comparing alternatives. These nine criteria were used to evaluate the five remedial alternatives individually and against each other to select a Preferred Alternative for the Benedict Field Bombing Target land area. The Preferred Alternative was selected based on which alternative was found to be most suitable to address the potential hazards on land at the site.

The nine criteria evaluated fall into three groups: threshold, primary balancing, and modifying criteria.

- *Threshold criteria* are requirements that must be met in order for an alternative to be eligible for selection.
- *Primary balancing criteria* are those that form the basis for comparison among alternatives that meet the threshold criteria.

- *Modifying criteria* are considered to the extent that information is available but cannot be fully evaluated until after the public comment period for the Proposed Plan has concluded.

USACE evaluated the relative performance of each alternative against the nine criteria, noting how the alternative compares to the other options under consideration. The nine evaluation criteria are listed in Table 2 and discussed in the section following the table. The detailed analysis of alternatives can be found in the Feasibility Study (USACE, 2024a).

Table 2: Evaluation Criteria for Remedial Alternatives

Threshold Criteria	Overall Protection of Human Health and the Environment
	Compliance with Applicable or Relevant and Appropriate Requirements
Primary Balancing Criteria	Long-Term Effectiveness and Permanence
	Reduction of Toxicity, Mobility, or Volume through Treatment
	Short-Term Effectiveness
	Implementability
	Cost
Modifying Criteria	State Acceptance
	Community Acceptance

Overall Protection of Human Health and the Environment determines whether an alternative eliminates, reduces, or controls potential threats to public health and the environment through institutional or engineering controls, or treatment.

Compliance with Applicable or Relevant and Appropriate Requirements evaluates whether the alternative meets cleanup levels, standards of control, or other requirements found in Federal and State environmental statutes, regulations, and other requirements that have been determined to apply or are relevant and appropriate to the site and action, or whether a waiver is justified.

Long-term Effectiveness and Permanence considers the ability of an alternative to maintain protection of human health and the environment over time.

Reduction of Toxicity, Mobility, or Volume through Treatment evaluates an alternative's use of treatment to reduce the harmful effects of principal contaminants, their ability to move in the environment, and the amount of contamination present.

Short-term Effectiveness considers the length of time needed to implement an alternative and the risks the alternative poses to workers, residents, and the environment during implementation.

Implementability considers the technical and administrative feasibility of implementing the alternative, including factors such as the relative availability of goods and services.

Cost includes estimated capital and annual operations and maintenance costs, as well as present worth cost. Present worth cost is the total cost of an alternative over time in terms of today's dollar value.

State and Community Acceptance considers whether the State and community agrees with the analyses and recommendations as described in the Feasibility Study and Proposed Plan. Comments received on the Proposed Plan are an important indicator of State and community acceptance. In the final balancing of trade-offs among alternatives on which the final remedy selection is based, modifying criteria are of equal importance to the balancing criteria.

SUMMARY OF ALTERNATIVE EVALUATION RESULTS

The five alternatives presented in this Proposed Plan, which were initially screened for effectiveness, cost and implementability, were carried forward for detailed analysis for the Benedict Field Bombing Target land area. A summary of the alternative evaluation is provided in Table 3.

COMPARATIVE ANALYSIS OF ALTERNATIVES

Based on the analysis of the five alternatives, USACE made the following conclusions.

- The No Action alternative (Alternative 1) does not meet the threshold criteria as it is not protective of human health since it does not mitigate the potential hazards associated with munitions on the land area of the Benedict Field Bombing Target. Alternative 1 also provides no reduction of toxicity, mobility, or volume through treatment and would not be effective in the long-term. However, the No Action alternative is readily implementable since it requires no actions and has no associated costs.
- The Land Use Controls alternative (Alternative 2) provides overall protectiveness of human health and is effective in the long-term. Although this alternative would not remove potential munitions from the site, it would increase awareness to the potential hazards and limit the potential for people to interact with munitions that may remain at the site due to the fencing and gates that would be installed to limit access to certain areas. This alternative would comply with the ***applicable or relevant and appropriate requirements*** specific to the Endangered Species Act (16 United States Code 1538(a)(1)(B)) since avoidance and mitigation measures would be implemented to prevent the take of threatened and endangered species (i.e., sea turtles) at the site when the fencing, gates, and signs are installed. These measures include having a biologist on site as needed during the installation and conducting work outside of the sea turtle's nesting season. Alternative 2 is also less disruptive to the environment than Alternatives 3, 4, or 5 since no removal activities would be required at the site. Alternative 2 is more cost-effective and easier to implement than the surface and subsurface removals (Alternatives 3, 4, and 5).
- The Focused Removal on High Use Area with Land Use Controls (Alternative 3) is protective of people and has greater long-term effectiveness than Alternatives 1 and 2. There is moderate short-term explosive hazards associated with the removal of munitions while implementing the alternative. Limited vegetation and debris removal would be required under this alternative. A biologist would be present during the removal and the installation of land use controls as needed. Measures such as exclusion zones (areas that will need to be closed to public access during the munitions removal work) and security guards would be used as needed to reduce any risks to the community. This alternative would comply with the applicable or relevant and appropriate requirements specific to the Endangered Species Act (16 United States Code 1538(a)(1)(B)) since avoidance and mitigation measures would be implemented to prevent the take of threatened and endangered species (i.e., sea turtles) at the site when the removal and the land use controls are implemented as described under Alternative 2. Removal work would be implemented under this alternative so it would comply with the Resource Conservation and Recovery Act (40 Code of Federal Regulations 264, Subpart X) if consolidated shots are required. There are also potential localized environmental impacts associated with Alternative 3 if avoidance and/or mitigation measures are not used, which makes it less implementable than either Alternatives 1 or 2. Alternative 3 is substantially more costly than Alternatives 1 and 2 but less costly than Alternatives 4 and 5.
- The Focused Removal on High Use Area, Roadways, and the Beach with Land Use Controls (Alternative 4) is protective of people and has greater long-term effectiveness than Alternatives 1, 2, and 3. There is moderate short-term explosive hazards associated with the removal of munitions while implementing the alternative. Moderate vegetation and debris removal would be required under this alternative except on the beach where no vegetation removal is anticipated. A biologist would be present during the removal and the installation of land use controls as needed. Measures such as

present during the removal and the installation of land use controls as needed. Measures such as exclusion zones and security guards would be used as needed to reduce any risks to the community. This alternative would comply with the applicable or relevant and appropriate requirements specific to the Endangered Species Act (16 United States Code 1538(a)(1)(B)) since avoidance and mitigation measures would be implemented to prevent the take of threatened and endangered species (i.e., sea turtles) at the site when the removal and land use controls are implemented as described under Alternative 2. Removal work would be implemented under this alternative so it would comply with the Resource Conservation and Recovery Act (40 Code of Federal Regulations 264, Subpart X) if consolidated shots are required. There are also potential localized environmental impacts associated with Alternative 4 if avoidance and/or mitigation measures are not used, which makes it less implementable than either Alternatives 1, 2, or 3. Alternative 4 is substantially more costly than Alternatives 1, 2, and 3 but less costly than Alternative 5.

- The Complete Surface and Subsurface Removal (Alternative 5) protects people by removing any munitions, if present, but it also has significant environmental impacts if mitigation measures are not used. Alternative 5 has the most long-term effectiveness of all the alternatives but also has the most short-term risks from potential explosive hazards associated with the removal of munitions. Alternative 5 has the highest and most difficult complexity for implementation of all five alternatives due to the larger acreage involved that is covered in dense vegetation and debris compared to the other alternatives. The use of exclusion zones and security guards would be needed for this alternative. Significant vegetation and debris removal would be required under this alternative. A biologist would be present during the removal. This alternative would comply with the applicable or relevant and appropriate requirements specific to the Endangered Species Act (16 United States Code 1538(a)(1)(B)) since avoidance and mitigation measures would be implemented to prevent the take of threatened and endangered species (i.e., sea turtles) at the site when the removal is implemented as described under Alternative 2. Removal work would be implemented under this alternative so it would comply with the Resource Conservation and Recovery Act (40 Code of Federal Regulations 264, Subpart X) if consolidated shots are required. This alternative is also significantly more costly than the other four alternatives.

Table 1: Detailed Analysis of Alternatives

Alternative	Threshold Criteria		Primary Balancing Criteria				
	Overall Protectiveness	**Complies with Applicable or Relevant and Appropriate Requirements[1]**	**Reduction of Mobility, Volume, or Toxicity of Munitions based on Treatment**	**Short-term Effectiveness**	**Long-term Effectiveness**	**Implementability**	**Cost**
Alternative 1: No Action	Not protective of human health and the environment	Not Applicable	No Reduction	No Short-Term Hazards *(since no work will be conducted)*	Not Effective	Readily Implementable	$0

Alternative	Threshold Criteria		Primary Balancing Criteria				
	Overall Protectiveness	Complies with Applicable or Relevant and Appropriate Requirements[1]	Reduction of Mobility, Volume, or Toxicity of Munitions based on Treatment	Short-term Effectiveness	Long-term Effectiveness	Implementability	Cost
Alternative 2: Land Use Controls	Protective of human health and the environment	Complies with Endangered Species Act (16 USC 1538(a)(1)(B))	No Reduction	Low Short-Term Hazards (*from Installing Signs, Fences, and Gates*)	Effective	Readily Implementable	$1.328 million
Alternative 3: Focused Removal on High Use Area with Land Use Controls	Protective of human health and the environment	Complies Endangered Species Act (16 USC 1538(a)(1)(B) and Resource Conservation and Recovery Act (40 CFR Part 264, Subpart X)	Localized Reduction	Moderate Short-Term Hazards (*from Munitions Removal from surface and subsurface in High Use Area*)	More Effective	Implementable	$4.252 million
Alternative 4: Focused Removal on High Use Area, Roadways, and the Beach with Land Use Controls	Protective of human health and the environment	Complies Endangered Species Act (16 USC 1538(a)(1)(B) and Resource Conservation and Recovery Act (40 CFR Part 264, Subpart X)	Localized Reduction *(Surface and Subsurface)*	Moderate Short-Term Hazards *(from Munitions Removal from surface and subsurface on High Use Area, roadways, and the beach)*	More Effective	Implementable	$6.622 million
Alternative 5: Complete Surface and Subsurface Removal	Protective of human health and the environment	Complies Endangered Species Act (16 USC 1538(a)(1)(B) and Resource Conservation and Recovery Act (40 CFR Part 264, Subpart X)	Greatest Reduction *(Surface and Subsurface)*	Greatest Short-Term Hazards (*from Munitions Removal from surface and subsurface over entire land area*)	Most Effective	Least Implementable	$11.719 million

Threshold criteria are pass or fail and, as such, are not graded with the color system.	Most Desirable	Significantly Desirable	Moderately Desirable	Least Desirable

PREFERRED ALTERNATIVE

No Action (Alternative 1) is the Preferred Alternative for the marine area (See Figure 5). It is appropriate because there is no unacceptable risk to human health or the environment attributable to the Department of Defense's past use of the marine area at the site. Land Use Controls (Alternative 2) is the Preferred

Alternative for the land area (see Figure 5). This alternative meets the threshold criteria while providing benefits over the other evaluated alternatives due to the relative ease and cost-effectiveness of implementation.

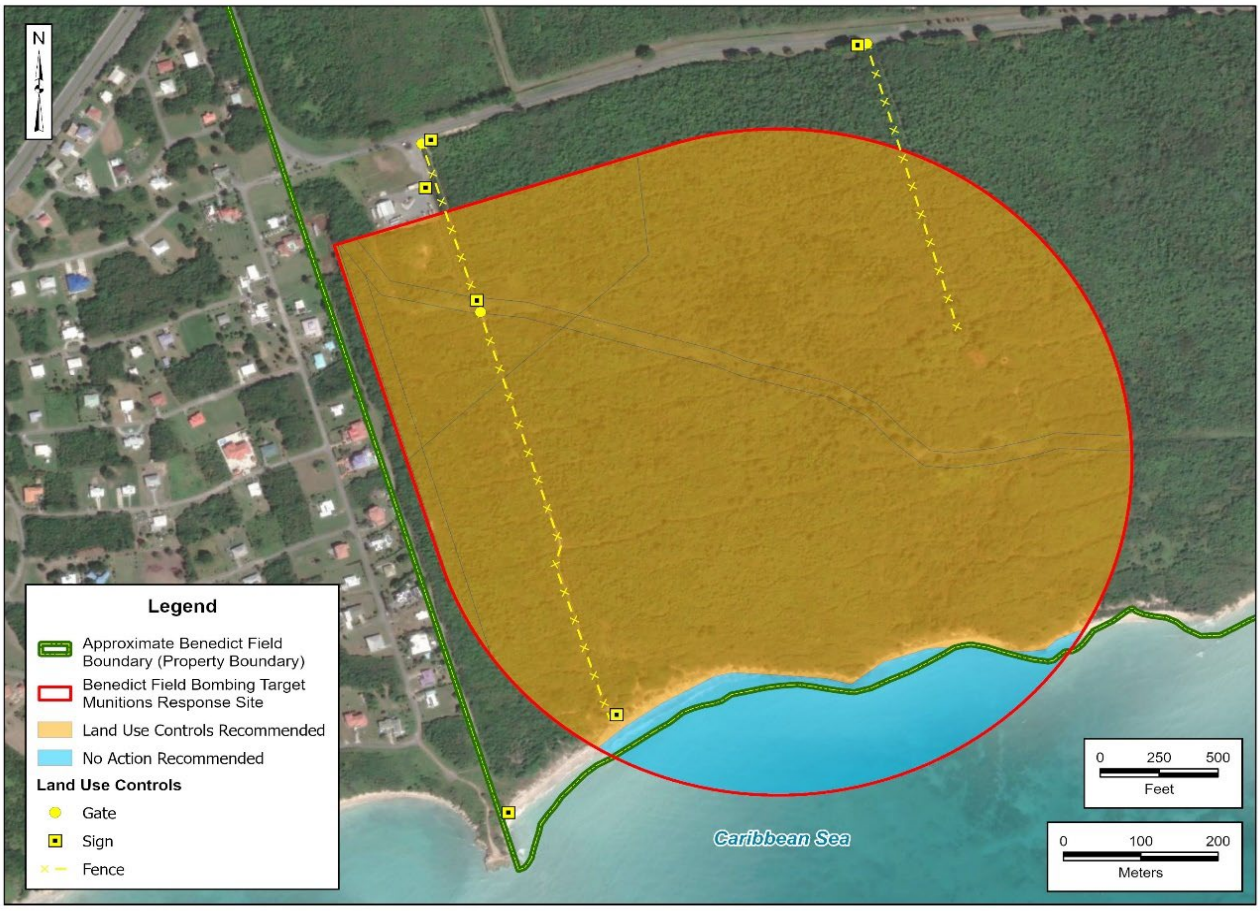

Figure 5: Preferred Alternatives

These land use controls would provide overall protection for human health by mitigating intentional or unintentional interactions with munitions and are effective in the short and long-term for the current use at the site, which is not anticipated to change in the future. Although this alternative would provide no reduction of toxicity, mobility, or volume through treatment, because munitions would not be removed from the site, this alternative is justified because it would increase awareness of the potential hazards and reduce the potential for people to interact with munitions that may remain due to limitations on site access from gates and fences. Alternative 2 can be implemented easily and at low cost without the potential environment disturbances required for the other alternatives that include searching for munitions. Avoidance measures would be put into place to comply with the applicable or relevant and appropriate requirements, as described under the comparative analysis of alternatives. Long Term Management would be required to ensure land use controls remain in place. Five Year Reviews, while not part of the remedy, would be statutorily required to evaluate the ongoing protectiveness of the remedy because the alternative does not achieve conditions that allow for unlimited use and unrestricted exposure. The Five-Year Review will determine, on a periodic basis not to exceed five years, if the selected remedy remains protective of human health, safety and the environment, and consider additional remedial action if necessary.

Based on the information currently available, these Preferred Alternatives are expected to satisfy the statutory requirements under the Comprehensive Environmental Response, Compensation, and Liability Act. USACE may modify the Preferred Alternatives in response to public comments or new information. The U.S. Virgin Islands Department of Planning and Natural Resources and the U.S. Virgin Islands Port Authority have reviewed the Remedial Investigation report and the Feasibility Study and agree with the USACE's analysis. Both agencies have indicated Alternative 2 would be acceptable for the land area and Alternative 1 is acceptable for the marine area. Community acceptance of this alternative will be evaluated after the public comment period. Further details regarding the evaluation of alternatives are presented in the Feasibility Study (USACE, 2024b).

COMMUNITY PARTICIPATION

USACE is requesting public comments on this Proposed Plan. Comments will be accepted throughout the public comment period (from August 19 through September 29, 2025). USACE will hold a public meeting on August 19, 2025 at 6:00 pm. The community may comment during the meeting and throughout the public comment period by calling 800.710.5184, emailing FUDS.Florida@usace.army.mil, or by filling out and mailing or emailing the comment sheet.

USACE will consider comments received during the comment period in the final remedial action decision that USACE will present in the Record of Decision. USACE's responses to public comments will be in the Responsiveness Summary section of the Record of Decision.

All reports and project documents are available for review in the Administrative Record File located at the Florence A. Williams Public Library (1122 King Street, Christiansted, Saint Croix, U.S. Virgin Islands) and in the USACE Jacksonville District office (701 San Marco Boulevard, Jacksonville, Florida). Documents are also posted on the project website (www.saj.usace.army.mil/BenedictField).

Contact Information

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Remember the 3 Rs of Explosives Safety

While the possibility of encountering munitions is low, always use caution in areas where the military has trained. Remember and follow the 3Rs of Explosive Safety: Recognize, Retreat, Report.

Recognize – When you may have encountered a munition and that munitions are dangerous.

Retreat – Do not approach, touch, move, or disturb it, but carefully leave the area.

Report - Call 911 and advice police of what you saw and where you saw it.

GLOSSARY OF TERMS

Administrative Record: The documents that form the basis for the selection of a response action compiled and maintained by the lead agency.

Applicable or Relevant and Appropriate Requirements: *Applicable requirements* means those cleanup standards, standards of control, and other substantive requirements, criteria, or limitations promulgated under federal environmental or state environmental or facility siting laws that specifically address a hazardous substance, pollutant, contaminant, remedial action, location, or other circumstance found at a Comprehensive Environmental Response, Compensation, and Liability Act site. Only those state standards that are identified by a state in a timely manner and that are more stringent than federal requirements may be applicable. *Relevant and appropriate requirements* means those cleanup standards, standards of control, and other substantive requirements, criteria, or limitations promulgated under federal environmental or state environmental or facility siting laws that, while not "applicable" to a hazardous substance, pollutant, contaminant, remedial action, location, or other circumstance at a Comprehensive Environmental Response, Compensation, and Liability Act site, address problems or situations sufficiently similar to those encountered at the Comprehensive Environmental Response, Compensation, and Liability Act site that their use is well suited to the particular site. Only those state standards that are identified in a timely manner and are more stringent than federal requirements may be relevant and appropriate.

Archives Search Report: A detailed investigation to report on past munitions and explosives of concern activities conducted on an installation. The principal purpose of the Archives Search is to assemble historical records and available field data, assess potential ordnance presence, and recommend follow-up actions at a Defense Environmental Restoration Program – Formerly Used Defense Sites. There are four general steps in an Archives Search: records search phase, site safety and health plan, site survey, and archives search report including risk assessment.

Comprehensive Environmental Response, Compensation, and Liability Act: Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended by the Superfund Amendments and Reauthorization Act of 1986.

Explosive Hazard: A condition where danger exists because explosives are present that may react (e.g., detonate, deflagrate) in a mishap with potential unacceptable effects (e.g., death, injury, damage) to people, property, operational capability, or the environment.

Feasibility Study: A study undertaken by the lead agency to develop and evaluate options for remedial action. The Remedial Investigation data are used to define the objectives of the response action, to develop remedial action alternatives, and to undertake an initial screening and detailed analysis of the alternatives. The term also refers to a report that describes the results of the study.

Five-Year Reviews: Reviews, pursuant to 40 Code of Federal Regulations 300.430(f)(4)(ii), conducted no less often than every five years after the initiation of the remedial action where that action leaves hazardous substances, pollutants, or contaminants at the site above levels that allow unlimited use and unrestricted exposure.

Formerly Used Defense Sites: Facility or site which was under the jurisdiction of the Secretary of Defense and owned by, leased to, or otherwise possessed by the United States at the time of actions leading to contamination by hazardous substances or pollutants and contaminants, for which the Secretary of Defense shall carry out all response actions with respect to releases of hazardous substance from that facility or site (10 United States Code 2701).

Intrusive Activity: Activity that involves or results in the penetration of the ground surface at an area known or suspected to contain munitions and explosives of concern. Intrusive activities can be of an investigative or removal action nature.

Land Use Controls: Physical, legal, or administrative mechanisms that restrict the use of, or limit access to, real property, to prevent or reduce risks to human health and the environment. Physical mechanisms encompass a variety of engineered remedies to contain or reduce contamination and physical barriers to limit access to real property, such as fences or signs. The legal mechanisms used for land use controls are generally the same as those used for institutional controls as discussed in the National Contingency Plan.

Long-term Management: The period of site management (including maintenance, review of site conditions, monitoring, record keeping, five-year reviews, etc.) initiated after response action (removal or remedial) to ensure continued protection as designed once a site achieves Response Complete.

Munitions and Explosives of Concern: Specific categories of military munitions that may pose unique explosives safety risks, such as unexploded ordnance, as defined in 10 United States Code 101(e)(5); discarded military munitions, as defined in 10 United States Code 2710(e)(2); or munitions constituents (e.g., trinitrotoluene, royal demolition explosive), as defined in 10 United States Code 2710(e)(3), present in high enough concentrations to pose an explosive hazard.

Munitions Constituents: Any materials originating from unexploded ordnance, discarded military munitions, or other military munitions, including explosive and non-explosive materials, and emission, degradation, or breakdown elements of such ordnance or munitions.

Munitions Debris: Remnants of munitions (e.g., fragments, penetrators, projectiles, shell casings, links, fins) remaining after munitions use, demilitarization, or disposal.

Munitions Response Site: A discrete location within an area on a defense site that is known or suspected to contain unexploded ordnance, discarded military munitions, or munitions constituents that is known to require a munitions response.

National Oil and Hazardous Substances Pollution Contingency Plan: A regulation promulgated by the Environmental Protection Agency that provides the regulatory framework for response actions under the Comprehensive Environmental Response, Compensation, and Liability Act, as well as National and Regional Response Teams that respond to releases of national or regional significance (40 Code of Federal Regulations Part 300). The National Contingency Plan designates the Department of Defense as the removal response authority for Department of Defense installations, and incidents involving Department of Defense military weapons and munitions or weapons and munitions under the jurisdiction, custody, or control of the Department of Defense.

No Action: No Action is a determination based upon an evaluation of the historical use of the site, or area(s) of concern, as applicable, that there are no discharged contaminants present at the site, or at any other site to which a discharge originating at the site has migrated, or that any discharged contaminants present at the site or that have migrated from the site have been remediated in accordance with applicable remediation regulations.

Preferred Alternative: The alternative that, when compared to other alternatives, best meets the Comprehensive Environmental Response, Compensation, and Liability Act evaluation criteria and is proposed for implementation at a site.

Preliminary Assessment: Review of existing information and an on or off-site reconnaissance, if appropriate, to determine if a release may require additional investigation or action.

Proposed Plan: In the first step in the remedy selection process, the lead agency identifies the remedial action alternative that best meets the requirements in the National Contingency Plan §300.430(f)(1) and (f)(2) and presents that preferred alternative to the public in a proposed plan. The purpose of the proposed plan is to supplement the Remedial Investigation/Feasibility Study and provide the public with a reasonable opportunity to comment on the preferred alternative for remedial action, as well as alternative plans under consideration, and to participate in the selection of remedial action at a site.

Record of Decision: A public document that reflects the decision of an authorized agency official selecting a remedial action to respond to a Comprehensive Environmental Response, Compensation, and Liability Act

release that requires a remedy at a Comprehensive Environmental Response, Compensation, and Liability Act site.

Remedial Action Objective: A site-specific, initial clean-up objective that is established based on the nature and extent of impacts, the resources that are currently and potentially threatened, and the potential for human and environmental exposure.

Remedial Investigation: A process undertaken by the lead agency to determine the nature and extent of the problem presented by the release. The Remedial Investigation emphasizes data collection and site characterization and is generally performed concurrently and in an interactive fashion with the Feasibility Study. The Remedial Investigation includes sampling and monitoring, as necessary, and includes the gathering of sufficient information to determine the necessity for remedial action and to support the evaluation of remedial alternatives.

Site Inspection: An on-site investigation to determine whether there is a release or potential release and the nature of the associated threats. The purpose is to augment the data collected in the preliminary assessment and to generate, if necessary, sampling and other field data to determine if further action or investigation is appropriate.

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