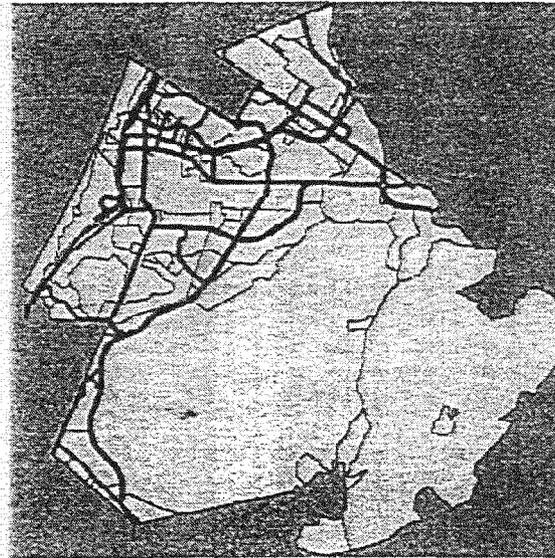


FORT ORD REUSE PLAN

Fort Ord Reuse Authority



March 1997

FINAL

PROGRAM ENVIRONMENTAL IMPACT REPORT

VOLUME I - COMMENTS

EMC Planning Group, Inc.

Table of Contents

VOLUME 1

1.0	Introduction to Volume 1	1
1.1	Background and Purpose of the Final Program EIR	1
1.1.1	Introduction	1
1.1.2	Background to the Project	2
1.1.3	Background and Purpose of the Final Program EIR	2
1.1.4	Indexing the Army Documents	3
1.1.5	Baseline Determination	3
1.1.6	Intended Uses of the Program-Level Final EIR	3
1.2	Organization of the Final PEIR	5
1.2.1	Volume I	5
	Assumptions Used To Create the Chronological List of Comments	5
	How to Find a Particular Comment Letter	6
1.2.2	Volume II	7
	How to Find a Particular Response to Comment	7

Appendices

Appendix A List of Commenters in Numerical Order
Appendix B List of Commenters in Alphabetical Order

VOLUME 2

1.0	Introduction to Volume II	1
1.1	Organization of the Final EIR	1
1.1.1	Volume I	1
	How to Find a Particular Comment Letter	1
1.1.2	Volume II	1
	How to Find a Particular Response to Comment	1

Appendices

Appendix C..... Table of Comments

**Appendix DAssessment of Planning Baseline and
Market Data Fort Ord Base Reuse Plan**

Appendix EFort Ord Regional Transportation Study

Appendix FThe Land Use - Air Quality Linkage

1.0 Introduction to Volume 1

1.1 Background and Purpose of the Final Program EIR

1.1.1 Introduction

The Fort Ord Reuse Authority (hereinafter "FORA"), as the Lead Agency, has prepared this Final Program Environmental Impact Report (hereinafter "Final PEIR") for the Fort Ord Base Reuse Plan in accordance with the California Environmental Quality Act (hereinafter "CEQA") and its implementation guidelines. This Final PEIR consists of the Fort Ord Reuse Plan Draft Program EIR and the comments and responses to the comments on the Fort Ord Reuse Plan Draft Program EIR. The proposed project is the adoption of the Fort Ord Reuse Plan (hereinafter "Reuse Plan") for what is known as Fort Ord. The Draft Program Environmental Impact Report (hereinafter "Draft EIR") was circulated by FORA for a 133 day public review period commencing on June 1, 1996 and ending on October 11, 1996.

Three public hearings on the Draft EIR were held during the public review period. The FORA Board held monthly meetings which were advertised in a local newspaper with wide distribution. These meetings were open to the public and were available as a public forum for discourse pertaining to the Reuse Plan and Draft EIR. In addition, local jurisdictions on the Monterey Peninsula held separate hearings on the proposed project.

Per CEQA Guidelines Section 15089, the lead agency shall prepare a final EIR before approving the project. The lead agency must respond to all significant environmental comments in a level of detail commensurate to that of the comment (CEQA Guidelines Section 15088).

A public review period will follow the circulation of the Final PEIR to allow the public an opportunity to review the Final PEIR before the FORA Board considers the proposed project. Notices of the availability of the final environmental documents will be sent out by FORA and copies of the final documents will be sent to public agencies as well as five sets of the final environmental documents to each of the local libraries that received the Reuse Plan documents and the Draft EIR.

1.1.2 Background to the Project

The former Fort Ord military base was downsized and realigned in 1991 pursuant to the Defense Base Closure and Realignment Act of 1990, commonly referred to as BRAC. Before former Fort Ord property can be transferred from military to civilian use, a Reuse Plan and an environmental review document on the Reuse Plan must be prepared. The Draft EIR and this Final PEIR have been prepared to evaluate potential impacts to the environment under CEQA that may result from implementing the proposed Reuse Plan, following disposal of the former Fort Ord lands by the United States Department of the Army (hereinafter "Army").

As established by Senate Bill (SB) 899, FORA is a governing body, formed to accomplish the transfer of former Fort Ord property from the Department of the Army (hereinafter "Army") to the local communities. FORA Act (Title 7.85, Section 67651(a)(b)(c)(d) of the government Code) requires FORA to accomplish the following:

- a) *To facilitate the transfer and reuse of Fort Ord with all practical speed;*
- b) *To minimize the disruption caused by the base's closure on the civilian economy and the people of the Monterey Bay area;*
- c) *To provide for the reuse and development of the base area in ways that enhance the economy and quality of life of the Monterey Bay community; and*
- d) *To maintain and protect the unique environmental resources of the area.*

The Reuse Plan is the intended vehicle for achieving these goals.

The Reuse Plan represents an ultimate buildout scenario for the reuse of the former Fort Ord over the next 40 to 60 years. However, the Draft Program EIR and this Final PEIR also provide a resource constrained development scenario for reuse of Fort Ord in the year 2015.

1.1.3 Background and Purpose of the Final Program EIR

Since the realignment of the former Fort Ord, the Army has prepared a number of documents relating to the disposal and reuse of the military base. The documents include the *Fort Ord Disposal and Reuse Final Environmental Impact Statement* (June 1993), the *Fort Ord Disposal and Reuse Draft Supplemental Environmental Impact Statement* (December 1993) and the *Fort Ord Disposal and Reuse Final Supplemental Environmental Impact Statement* (June 1996) (hereinafter referred to as "Army

documents"). Senate Bill 1180 allows FORA to rely in part on the Army's previous environmental documents for environmental review of the proposed project.

The Draft EIR and the Final PEIR thus incorporate by reference pertinent background information and analysis from the previous Army documents, which is relevant to the identification and evaluation of base-wide environmental impacts addressed in the Draft EIR and the Final PEIR. The Draft EIR and the Final PEIR are therefore supplemental to the previous Army documents.

1.1.4 Indexing the Army Documents

In order to simplify access to relevant information from the Army's previous documents an Index has been provided in Section 1.9 in the form of a table (Table 1.9-1) in the Draft EIR. The Draft EIR summarizes key information from the Army documents where appropriate. Readers interested in further particular resource information or analysis will need to refer directly to the Army documents.

1.1.5 Baseline Determination

As with the Army documents, the Draft EIR and Final PEIR determine whether the proposed project may have a significant impact on the environment based on physical conditions that were present at the time the decision became final to close Fort Ord as a military base (September 1991). This complies with Section 21083.8.1 of the Public Resources Code.

1.1.6 Intended Uses of the Program-Level Final EIR

The Final PEIR is intended to be used as the CEQA compliance document for "all public and private actions taken pursuant to, or in furtherance of, a reuse plan which shall be deemed a single project (Public Resources Code, Section 21166)." However, future environmental analysis beyond the Draft and Final PEIR shall be conducted if any of the following events should occur:

- a) *Substantial changes are proposed in the project which will require major revisions of the environmental impact report;*
- b) *Substantial changes occur with respect to the circumstances under which the project is being undertaken which will require major revisions in the environmental impact report; or*
- c) *New information, which was not known and could not have been known at the time the environmental impact report was certified as complete, becomes available."*

(Public Resources Code Section 21166)

CEQA environmental review conducted for future individual projects that implement the Final Reuse Plan will be limited to the extent this program-level analysis remains adequate for such purposes. Section 15152 (b) of the State CEQA Guidelines establishes:

“Where an EIR has been prepared for a program, plan, policy, or ordinance consistent with the requirements of this section, any Lead Agency for a later project pursuant to or consistent with the program, plan, policy, or ordinance should limit the EIR on the project to effects which:

- 1) *Were not examined as significant effects on the environment in the prior EIR; or*
- 2) *Are susceptible to substantial reduction or avoidance by the choice of specific revisions in the project, by the imposition of conditions, or other means.”*

Additional CEQA analysis may also be required at the specific project level to give decision makers more information about site-specific issues which are not addressed in this program-level EIR and to the level of specificity appropriate for a project level review. Agencies that are expected to use the Draft and Final PEIR for future project approvals include, but are not limited to the following:

Federal Agencies

- United States Bureau of Land Management (BLM)
- United States Army (Army)

State Agencies

- Fort Ord Reuse Authority (FORA)
- California Coastal Commission
- California State Parks Department
- California State University Monterey Bay (CSUMB)
- University of California

Local Agencies

- County of Monterey
- City of Marina
- City of Seaside
- City of Del Rey Oaks
- Monterey County Local Agency Formation Commission (LAFCO)

It is understood that certain project-specific environmental documents are in preparation for facilities such as University of California Monterey Bay Education, Science and Technology Center (UCMBEST) and California State University

Monterey Bay (CSUMB). This document is intended to provide guidance for such project-specific documents as well as adequate CEQA review of cumulative and base-wide issues, which may not need to be addressed in subsequent tiered documents.

This Final PEIR incorporates the Draft EIR by reference. The reader is referred to the Draft EIR for additional background information on the project.

1.2 Organization of the Final PEIR

1.2.1 Volume I

The Final PEIR consists of the following documents: Volume I, Volume II and the Draft EIR (incorporated herein by reference).

Volume I contains the written comments received on the draft program Fort Ord Reuse Plan and EIR, written and oral comments submitted at public hearings held by FORA and member agencies. Volume II contains the responses to the comments.

The comments received have been arranged in chronological order by the date of transmittal referenced on the letter or by the date of the public hearing the comment was made. This organizational approach reflects FORA's desire to treat each comment received in an equal manner. The response to comments contained in Volume II also reflects this order. An index listing the comments received in chronological and alphabetical order is also included in Volume I to assist the reader in making it easier to find a comment (Appendix A and B, respectively).

Assumptions Used To Create the Chronological List of Comments

1. Three letters were submitted before the opening of the Draft EIR public review period and are included in the list of commenters;
2. Comments received after the close of the public review period are included in the list of commenters;
3. The list of commenters does not include letters requesting only a copy of the plan or EIR materials. In these cases, the documents were sent;
4. If letters have no legible dates, as is the case with two letters forwarded by U.S. Representative Sam Farr's office after the close of the public review period, they are listed at the end of the last day of the public review period along with their date of receipt;
5. Agency names are listed when known. In the cases where a speaker presenting him or herself as being a citizen and representative of an agency, two names are listed;

6. For some written comments, names and/or addresses are transferred from a cover or facsimile sheet to the letter itself to save paper. Written comments submitted on postcards and/or odd-sized paper are copied onto letter-sized paper to better fit within this document;
7. When letters and media articles are included as attachments to the comment letter submitted to FORA, only the letter receives a response. The majority of attachments to comment letters received by FORA are prior submittals, or already a matter of public record. In one case the attachment was read at a public meeting and is included as a comment;
8. Anonymous letters were also accepted. Where an author could be identified, a name was added;
9. As it pertains to public hearings, the following approach was used:
 - a) Hearings, both those of FORA and of member agencies where the hearing was announced as a public hearing and where the agency conveyed its minutes to FORA, are included in the chronological list upon the date of the hearing;
 - b) At hearings where speakers have submitted in writing something different from what was presented verbally, two submittals are listed, the verbal submittal first and the written submittal second;
 - c) When the speaker read from a written statement, the letter is attached to the end of the minutes for that particular hearing;
 - d) In the case where an oral comment is accompanied with written comments, the response provided in Volume II is on the written comments only.
 - e) In a few instances, a speaker read a letter at a public hearing and then ~~sent~~ the letter they read to FORA. In these cases, the date of that letter will be how it is ordered in the Final PEIR;
10. In some of the FORA and member agency public hearings, a question and answer (Q&A) format existed. In this case, the questions are listed as comments.

Comments were received from the agencies, organizations and individuals listed in Appendix A of this volume.

How to Find a Particular Comment Letter

To make a search for a particular comment located in Volume I easier for the reader, the alphabetical list of commenters is provided in Appendix B of this volume. This list is based on the names of organizations, agencies and individuals who submitted

oral or written comments. To find what page in Volume I a particular comment is located, look up the comment number assigned to the commenter from the alphabetical list and then look for this number in Volume 1.

1.2.2 Volume II

Volume II contains the response to comments and changes to the Reuse Plan and the EIR, as well as new policy considerations for the FORA Board to consider. Volume II also contains the following appendices: Table of Comments; Assessment of Planning Baseline and Market Data Fort Ord Base Reuse Plan; Fort Ord Regional Transportation Study; and the Land Use - Air Quality Linkage.

How to Find a Particular Response to Comment

To make a search for a particular response to comment in Volume II easier the reader should obtain the comment number from the alphabetized index (contained in Appendix B of Volume I) and then refer to the response in Volume II corresponding to the comment.

MEMORANDUM

Resubmitted

Date: April 4, 1996

To: Mayor/Council
 Tim Brown, City Manager
 Dennis Potter, Planning Services Manager

From: Council Member Mancini

Subject: Comments On ^{Admin Draft} Draft FORA Base Reuse Plan

These comments are provided in addition to those comments provided to you in the Memorandum, Subject as above, dated March 26, 1996, by Dennis Potter. Wherever possible, I will try not to duplicate any of Mr. Potter's comments. It may be necessary however to make reference to some of his.

Vol 1.

- p. 1-8: Last paragraph. "The vision for the future of Fort Ord is that a community will grow up on the former Base, having a special character and identity unique to itself."
- p. 1-9 Design Principle 3: Establish a mixed-use development pattern with villages as focal points. "Consistent with the character of a college town with a vibrant, around-the-clock activity and vitality, ~~the new community~~ is planned to consist of a series of villages with mixed-use centers." (emphasis added)

These two comments, and others as well, give the impression that CSUMB will be a focal point from which all other development -- residential, commercial, and educational -- will spread. As referred to in later pages, CSUMB is considered as the "TOWN CENTER". An implication that the former Fort Ord shall emerge as a separate city.

- p. 1-15. ~~Community-Building Strategy~~. "This strategy will: 1) provide a community that supports the emerging CSUMB campus;...."

Once again reference to CSUMB as the focal point for "developing and balanced communities...." Where does it become "seamless" (Vol. 2)?

- p. 2-6. First paragraph. "The full-time students are projected to spend an amount equal to that spent in the local community by the soldiers that have been relocated to Fort Lewis." 2

Even with CSUMB at 25,000 FTE students and a 3,000 member faculty/staff, there is no way that a student who attends classes for approximately nine months on campus (or 180 academic days) is going to spend anything near that of a single soldier who lived and worked on the former Fort Ord 365 days a year.

- p. 2-11. Third bullet from top. Ethnicity of cities should be more definitive, to include all cities on the Monterey Peninsula -- not just Marina, Seaside, and Sand City, i.e., specific percentages. 3

- p. 2-14. Table 2.2-3. Population Projections. Between 1995 and 2015, Marina is projected to increase by 26,093 (from 16,595 to 43,688), and Seaside is projected to increase by 20,190 (from 26,942 to 47,132). Total increase for the two cities is 46,283. 4

If 25,000 of that figure reflects CSUMB FTE, what figures are attributed to those in the military enclave (POM Annex)? Can the planned density of dwellings/acre actually support another 21,000? Do these figures apply to Homeless providers, Continued Care residents, and Vietnam Veterans in the former Patton Park? 5

p. 2-31. Para. 2.3.4 Retail. Regarding 2d and 3d bullets and average expenditure of \$1,000 annually for each employee and student. 6

Contradicts page 2-6 about the projections that full-time students will spend an amount equal to the soldiers that have been relocated. My experience with soldiers over 23 years is that a soldier will spend most, if not all, his/her pay (\$500 or more per month) in the local community. Married soldiers will, of course, spend more -- rent, food, clothing, etc. Page 2-6 needs revisiting.

p. 3-3. Design Principle 3. Once again, reference to a series of villages with mixed-use centers. Some being built around existing and new residential neighborhoods, while other village themes will include: the TOWN CENTER with employment, etc. 7

Where do the consultants envision the "TOWN CENTER" to be?

p. 3-4. Design Principle 4. Reference to the adding of new residential neighborhoods "ranging from high density units in the TOWN CENTER and village centers, to large lot single family areas." 8

How many village centers are envisioned around this "Town Center?" Is there an artist's rendering available?

p. 3-5. **Community Form** "The new community will be related and connected to the adjacent cities of Marina and Seaside and will compromise important parts of those cities; however, the Fort Ord area will have its own distinct form consisting of definable edges, entries, and structure." 9

Following thereafter are six bullets in which three refer to a community with "a readily discernible edge", creation of "a compact community form" and consistent with peninsula prototypes".

Once again reference is made to a separate community. What will the "discernible edge" be? And a "compact community form" consistent with "peninsula prototypes" is not consistent with the "village centers" concept mentioned previously. 10

Which "peninsula prototypes" are envisioned?

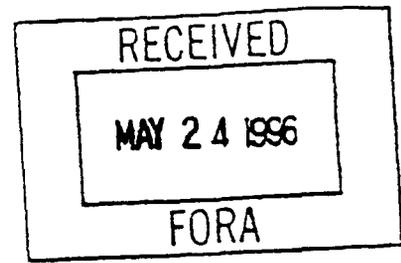
p. 3-9. Landscape and Open Space. "Establish an open space corridor of a minimum of 100 feet along the entire eastern edge of State Highway 1. and landscape this Fort Ord corridor via master landscape plan...."

No problem with the 100 foot minimum. But where does the 100 feet start from -- the CATRANS ROW or the existing Fort Ord boundary? Also the 100 foot comment is not consistent with the 500 foot strip of land mentioned on p. 4-65, Vol. 2, Program D-13.

- p. 3-22. Existing Housing Resources. Not just here but throughout, Brostrom Park should be added whenever reference is made to existing housing. This was observed by Dennis Potter in his comments. | 11
- p. 3-25 Table 3.3-1. No mention of the polygons within the City of Del Rey Oaks. | 12
- p. 3-77 Table 3.7-1. No mention of planning areas in the City of Del Rey Oaks. | 12
- p. 3-96. Development Character and Guidelines. Another reference to an "urban edge" reinforcing the University Village boundary. | 13
- p. 3-119 Paragraph 3.10.5 South Gate Planning Area. In reality this area is in Del Rey Oaks, and should be addressed as such. | 14

Vol. 2

- p. 4-2. The term "seamless" appears, and in context tends to contradict Vol. 1 references to Town and Village Centers, discernible and urban edges. | 15
- p. 4-18 Paragraph 4.1.2. City of Seaside. Again no reference to housing stock in Sun Bay Apartments or Brostrom Park. | 16
- p. 4-35. Program C-1.5. What is meant by "three discreet locations"? | 17
- p. 4-86. Coe Avenue. Coe Avenue may end at Monterey Road but access to Hwy 1 takes place at the end of Monterey Road at Fremont Blvd. | 18
- p. 4-107 Bicycles. Access to the Pacific Coast Bikeway can done from Fort Ord at the 12th Street Overcrossing, and again at Fremont Blvd as the bikeway ends in Seaside. | 19



May 23, 1996

Les White, Executive Officer
Fort Ord Reuse Authority
100 Twelfth Street
Marina, CA 93933

Re: Administrative Draft Reuse Plan

Dear Mr. White:

Thank you for the opportunity to review the Administrative Draft of the Fort Ord Reuse Plan. In reviewing the draft document, we have noted that the specific locations of the various transit facilities which MST anticipates developing at Fort Ord are not correctly identified in either the text or maps. *We request that the plan be modified to accurately reflect the location and design concept of each of these facilities.*

MST, TAMC, FORA and the FORA member agencies have spent considerable time determining the specific location and design concept for transit facilities. Three sites have been identified for these facilities: the Intermodal Transportation Center which is located at Fifth Street and First Ave.; a Park & Ride Facility at the Southeast corner of Imjin Road and Twelfth Street; and a Park & Ride Facility at the Northeast corner of Gigling Road and Eighth Ave. Maps showing the parcel boundaries for each of these facilities are attached

All three of these sites were identified in the Intermodal Centers Siting Study, which was prepared by Reimer Associates for FORA in January 1995. This study was prepared with significant input from the FORA member agencies and was adopted by the FORA Board. Furthermore, each of these projects is identified in the AMBAG adopted MTIP. The MTIP has been approved by both the Federal Transit Administration and the Federal Highways Administration

Following the preparation of the Intermodal Centers Siting Study, MST has further refined the boundaries of the parcels of land required for these facilities. Bestor Engineers has prepared surveys of each parcel. These surveys have been reviewed by Nick Nichols representing the County of Monterey and both Jeff Dack and Peter Li representing the City of Marina. Both land use jurisdictions have indicated that the draft survey is acceptable. Furthermore, Ann Hebenstreit of your staff has reviewed the draft survey of these parcels and found them to be acceptable. ✓

The various maps provided in the Administrative Draft Reuse Plan do not identify the land required for any of the Intermodal Transportation Facilities identified above. Furthermore, the text in Section 4.2.3--Transit incorrectly suggests that the Intermodal Transit Center be located at First Ave. and Eighth Street instead of at First Ave. and Fifth Street. The specific locations of the Park & Ride facilities are not even discussed in the text. We request that all of these facilities be explicitly identified in both maps and the text of the plan.

In addition to developing transportation centers, MST plans to develop an Operations and Maintenance Facility at Fort Ord. This facility will be bound by Seventh Street to the West, Col. Durham Road to the North, and Gigling Road to the South. The draft reuse plan currently indicates that this area will be used as a transit center and shows a footprint which is larger than the property we are requesting. Please modify the maps to correctly show the size of the facility we are requesting and change both the maps and text to indicate that this parcel will be developed into a transit operations and maintenance facility.

Thank you for your consideration. We have additional comments on the Administrative Draft of the Fort Ord Reuse Plan, which we will submit under separate cover. If you have any questions about the comments provided in this letter, please call me at 399-2558 or Doran Barnes, MST's Planning Manager at 393-8129.

Sincerely,



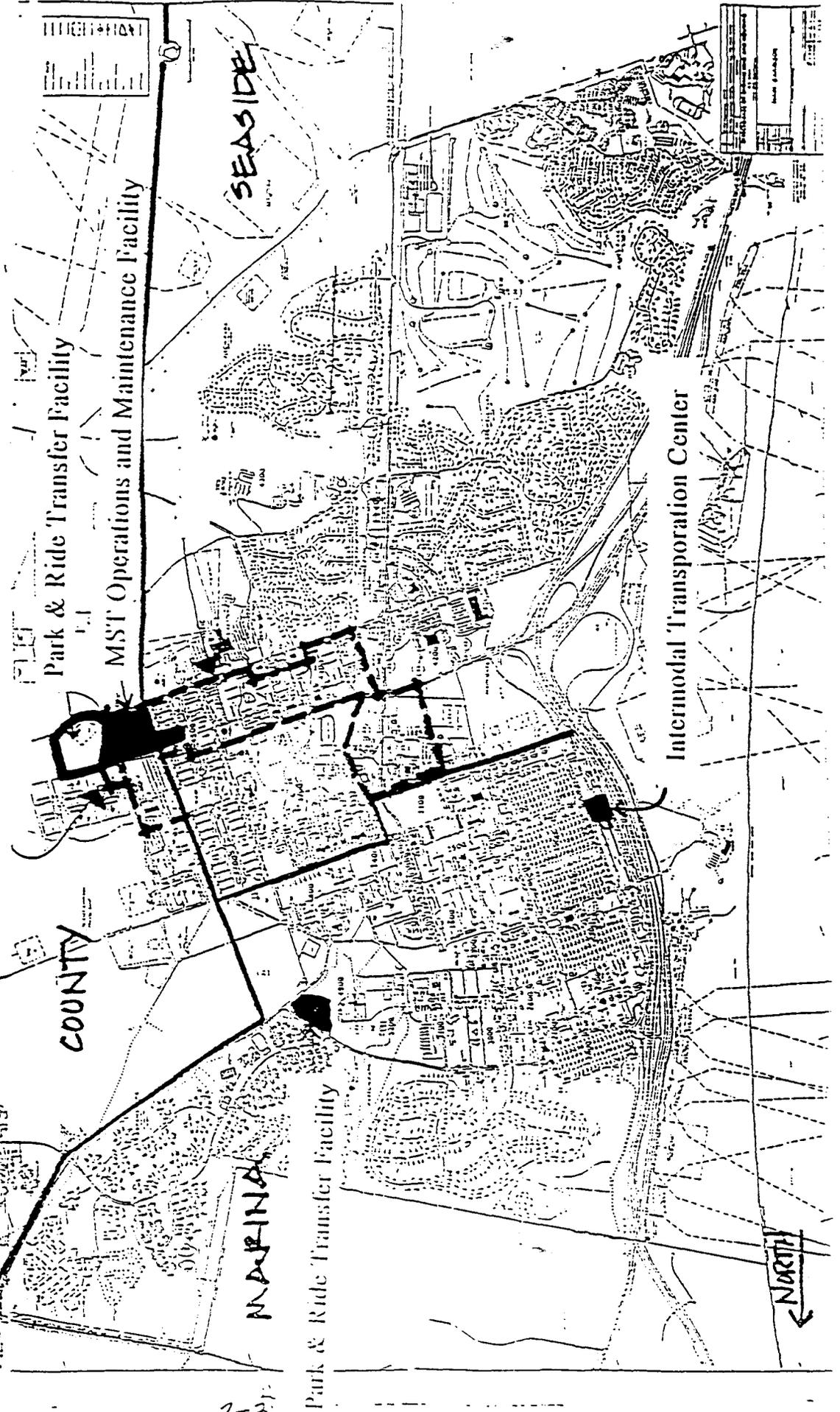
Frank J. Lichtanski
General Manager

DJB:sb

cc: J. Barlich, FORA
G. Gromko, TAMC
N. Papadakis, AMBAG
J. Longley, City of Marina
T. Brown, City of Seaside
V. Ferguson, County of Monterey
J. Kersnar, City of Carmel-by-the Sea
S. Endsley, City of Del Rey Oaks
F. Meurer, City of Monterey
M. Huse, City of Pacific Grove
D. Mora, City of Salinas
K. Morgan, City of Sand City
D. Salazar, CSUMB
L. Martin, UCSC
MST Board of Directors

Monterey-Salinas Transit
Intermodal Transportation Facilities
and Operations and Maintenance Facility
Public Benefit Conveyance Requests

**EXCESS IF
OR SURPLUS II**



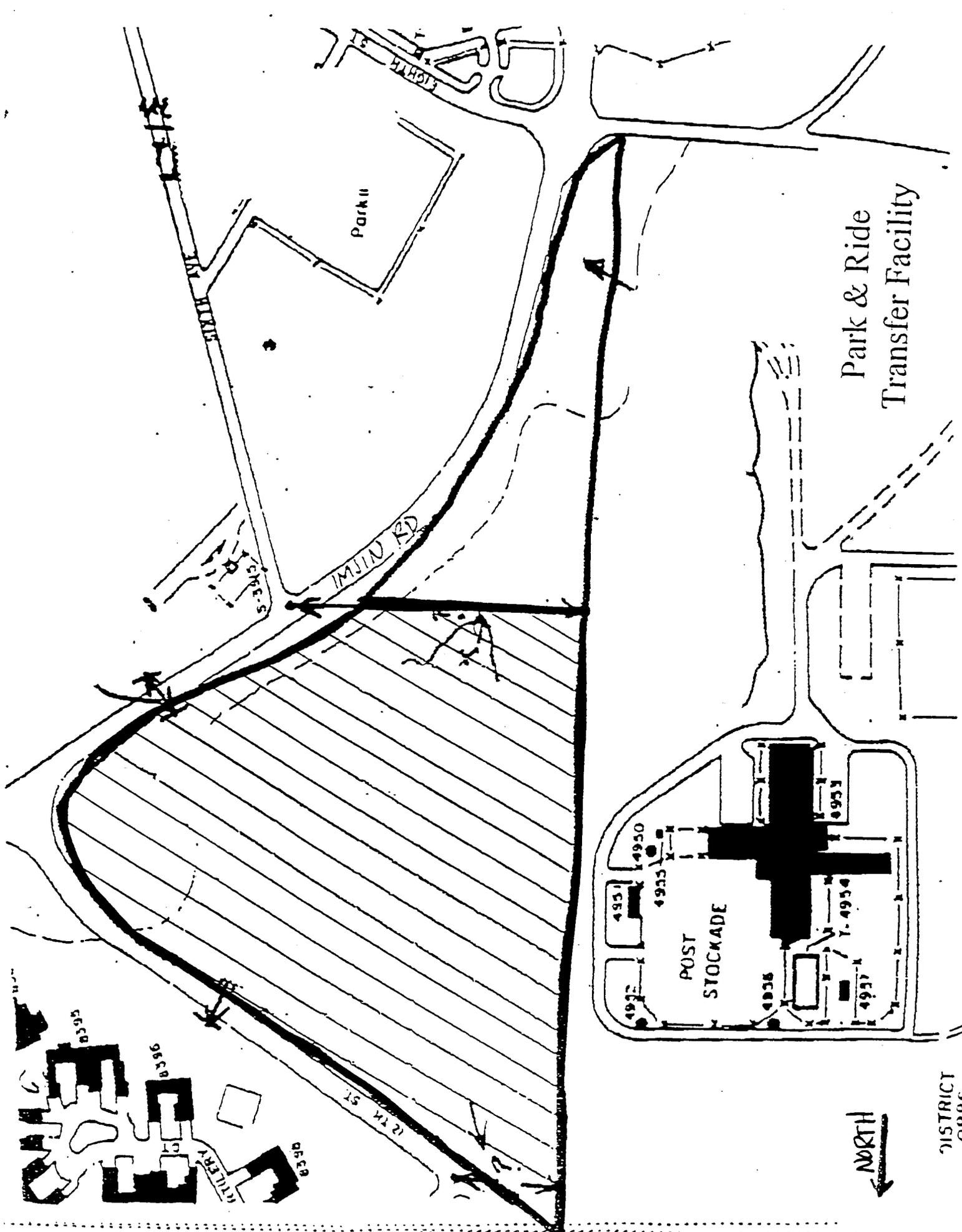
HIGHWAY

BLDG
2028

FIRST AVE

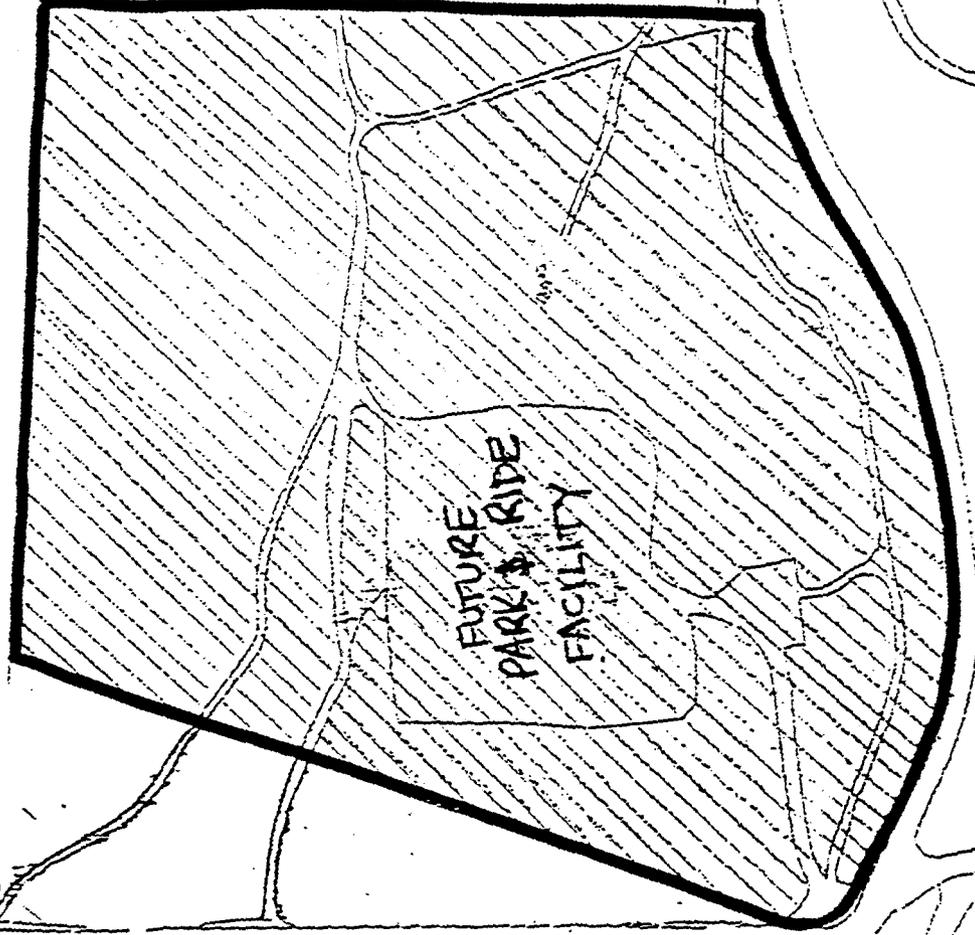
Intermodal
Transportation Center





PDM ANNEX
MOTOR POOL

43182



FUTURE
PARK & RIDE
FACILITY

Park & Ride
Transfer Facility

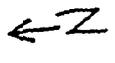
SPILL AVE

1947
Ced. DURINA ST

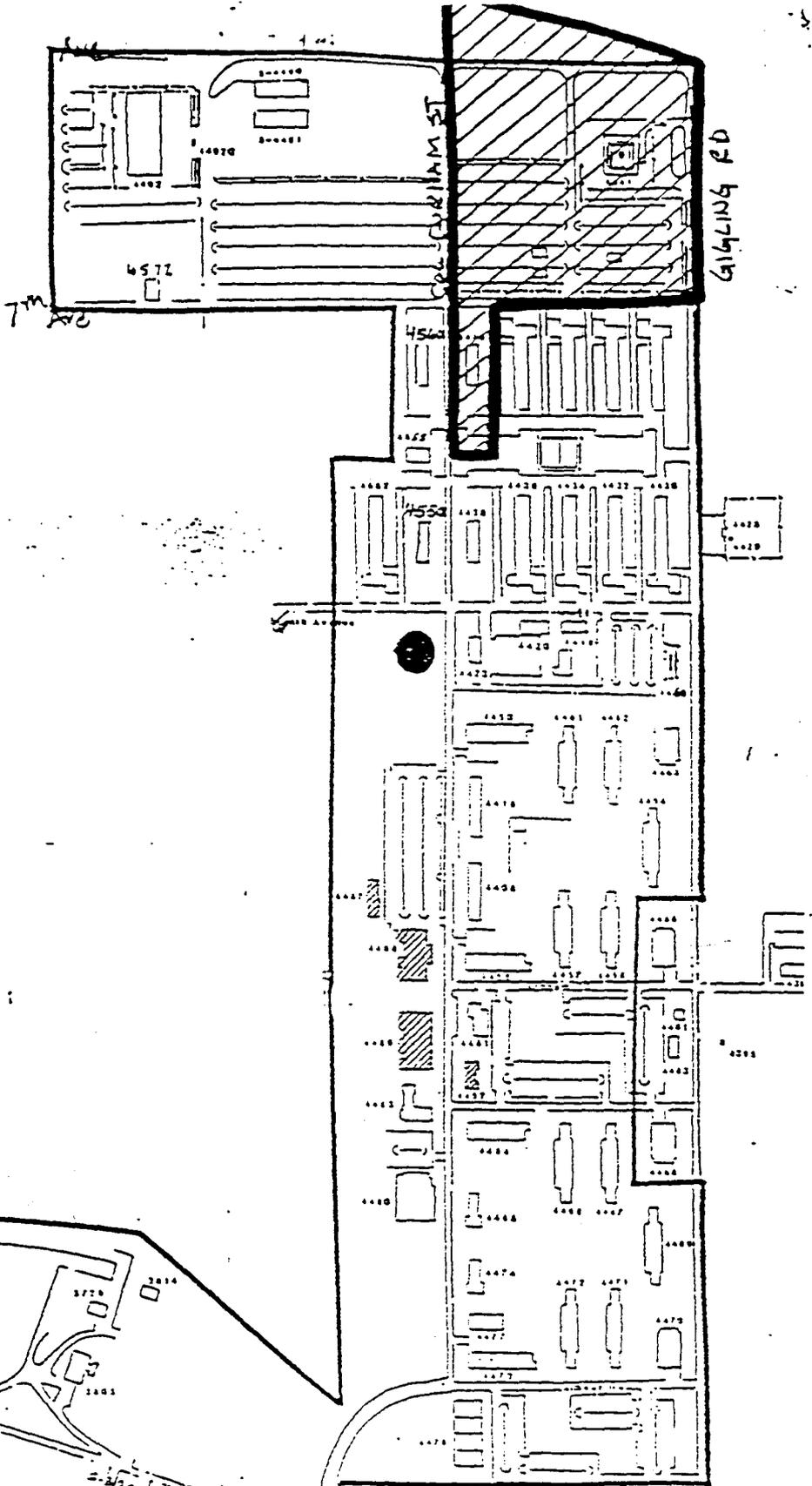
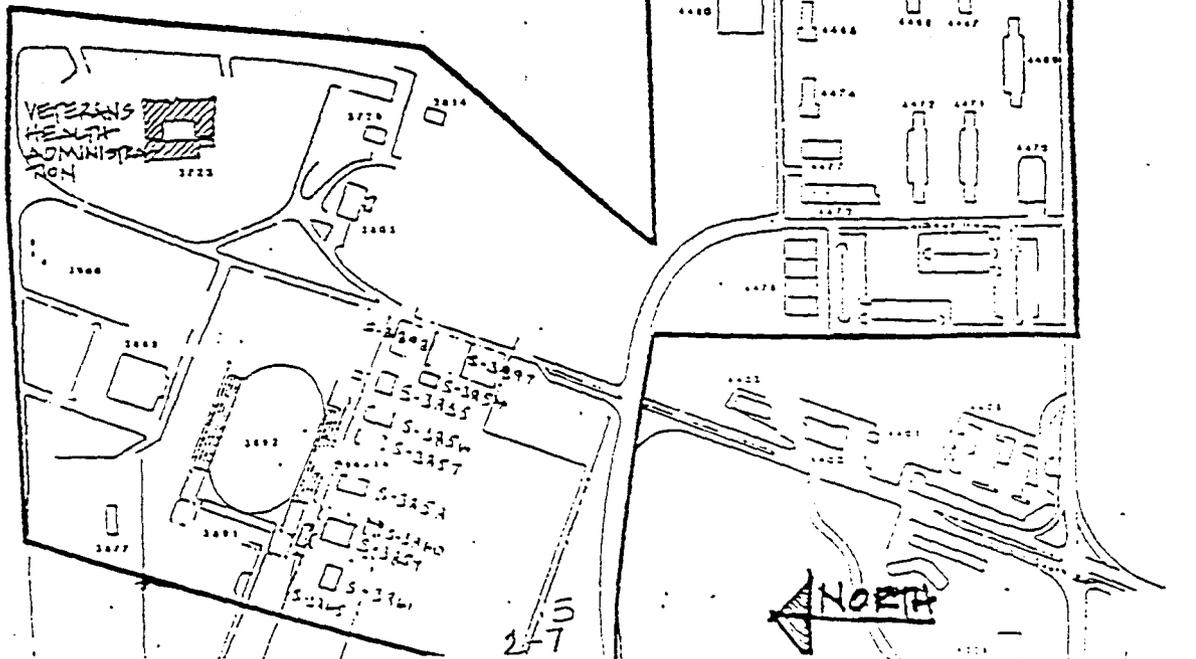
1957
OPERATIONS &
MAINTENANCE FACILITY

1957
GILGILINA RD

2-0



MST Operations and Maintenance Facility



MEMORANDUM

TO: Les White, FORA Executive Officer
cc: Jeff Dack, Planning Director

FROM: John Longley, Marina City Manager

DATE: May 30, 1996

RE: FORA Plans

Thank you for your assistance in making multiple copies of the plans available. It will be facilitate the review process in Marina greatly.

When I looked at the Public Service plan. I went to the numbers regarding Marina. I was very concerned that in my impression Angus did not address any of the revenue issues we raised. Because of this, for Marina in my opinion, his analysis is simply wrong and greatly overstates the real revenues we will receive.

After we spent so much time reviewing it, I was very surprised that Angus gave our concerns such little attention.

MEMORANDUM

Date: June 5, 1996

To: Mayor/Council
Tim Brown, City Manager
Dennis Potter, Planning Services Manager

From: Council Member Mancini

Subject: Public Draft Fort Ord Reuse Plan - Vol. 1: Context & Framework
- Vol. 2: Reuse Plan Elements
- App. B: Business & Operations Plan
- Draft Environmental Impact Report

These comments are provided in addition to those comments provided to you in the Memorandum dated April 4, 1996, Subject: Comments on Draft FORA Base Reuse Plan (Volumes 1 & 2).

p. 1-10. First paragraph. "The vision for the future of the former Fort Ord is that a community will grow up on the former Base, having a special character and identity." unique to itself."

Design Principle 3: Establish a mixed-use development pattern with villages as focal points. "Consistent with the character of a college town with a vibrant, around-the-clock activity and vitality, the community is planned to consist of a series of villages with mixed-use centers."

These two comments, and others throughout, give the impression that CSUMB will be a focal point from which all other development -- residential, commercial, & educational -- will spread. As referred to in later pages, CSUMB is considered as the "TOWN CENTER". An implication that the former Fort Ord shall emerge as a separate city. The words "unique" and "new community" used in earlier drafts seem to have been omitted, but the intent is still implied.

p. 1-17. ~~Community-Building Strategy~~. "This strategy will: 1) provide a community that supports the emerging CSUMB campus;...."

Once again reference to CSUMB as the focal point for "developing coherent and balanced communities...."

p. 2-6. Last paragraph. "The CSUMB campus is projected to create a level of economic activity equal to that of the military departing the area. It will employ 3,000 when fully developed, with an annual budget of approximately \$200 million. The full-time students are projected to spend an amount equal to that spent in the local community by the soldiers that have relocated to Fort Lewis."

Even with CSUMB at 25,000 FTE students and its 3,000 member faculty/staff, there is no way that a student who attends classes for approximately nine months on campus (or 180 academic days) is going to spend anything near that of a single soldier who lived and worked on the former Fort Ord 365 days a year. 2

Soldiers have two sets of clothing -- one civilian and one military. Laundry and dry-cleaning services alone consumed a fair amount of a soldier's wages. With few exceptions, almost every soldier had a motor vehicle. Married personnel had at least two. One of the largest units, the 155th Aviation Battalion, with its pilots, ALL officers and warrant officers, received flight pay. The military infrastructure of an active-duty light infantry division alone generated wages, quarters allowances, rations allowances, etc., that will never be equalled by the 25,000 FTE and 3,000 staff/faculty. I suggest that consultants determine how many millions of dollars were spent by the Army annually just in purchases locally of supplies, services, and rations. **Comments relating to what students and staff/faculty will spend need to be revisited.** (If my memory serves me correctly, the monthly payroll alone was somewhere near \$5 million, of which an estimated 70 percent was spent locally.)

p. 2-12. Third bullet from top. Ethnicity of cities should be more definitive, and not just mentioned in general terms. What is a "significant" percentage as compared to other cities without "significant" percentages? 3

p. 2-15. Table 2.2-3. Population Projections. Between 1995 and 2015, Marina is projected to increase by 26,093 (from 16,595 to 43,688), and Seaside is projected to increase by 20,190 (from 26,942 to 47,132). Total increase for the two cities is 46,283. 4

If 25,000 of that figure reflects CSUMB FTE, what figures are attributed to those in the military enclave (POM Annex)? Can the planned density of dwellings/acre actually support another 21,000? Do these figures apply to Homeless providers, Continued Care residents, and Vietnam Veterans in the former Patton Park?

p. 2-31. Para. 2.3.4 Retail. Regarding 2d and 3d bullets and average expenditure of \$1,000 annually for each employee and student. 5

Contradicts page 2-7 about the projections that full-time students will spend an amount equal to the soldiers that have been relocated. My experience with soldiers over 23 years is that a soldier will spend most, if not all, his/her pay (\$500 or more per month) in the local community. Married soldiers will, of course, spend more -- rent, food, clothing, etc. Page 2-7 needs revisiting.

p. 2-32. 2nd paragraph from bottom. "There will be demand...." As mentioned by Dennis Potter in his March 26 Memorandum, consultants should explain why no regional entertainment/retail center will occur in Seaside until the year 2011. 6

p. 2-36. 2.4.3 PBC, EDC Process. The consultants should emphasize the impact of McKinney Act transfers on local services provided by the land use agency where the property is located. Number of requests, number of buildings, locations, and percentage of property affected should be addressed. 7

- p. 3-3. Design Principle 1: Create a **unique community** around the educational institutions. (emphasis added) 8
- p. 3-5. Design Principle 3: Establish a mixed-use development pattern with villages as focal points.
- p. 3-9. **Community Form** "The new community will be related and connected to the adjacent cities of Marina and Seaside and will compromise important parts of those cities; **however, the Fort Ord area will have its own distinct form consisting of definable edges, entries, and structure.**"

Following thereafter are six bullets in which three refer to a community with "a readily discernible edge", creation of "a compact community form" and consistent with peninsula prototypes".

Once again reference is made to a separate community. What will the "discernible edge" be? And a "compact community form" consistent with "peninsula prototypes" is not consistent the "village centers" concept mentioned previously.

Which "peninsula prototypes" are envisioned?

Who establishes the "specific design and signage standards for the State Highway 1 Scenic Corridor to minimize the visual impact of development -- the land use entity or others? Is this a control issue wherein Seaside will not be able to establish its own design and signage standards? 9

- p. 3-19. Landscape and Open Space. "Establish an open space corridor of a minimum of 100 feet along the entire eastern edge of State Highway 1 and landscape this Fort Ord corridor via master landscape plan...." 10

No problem with the 100 foot minimum. But where does the 100 feet start from -- the Caltrans ROW or the existing Fort Ord boundary.? Also the 100 foot comment is not consistent with "strip 500 feet wide (from the Caltrans ROW) along State Highway 1 (Polygons 20a & 20h) as **Special Design Districts** to convey the commitment to high-quality development to residents and visitors." See Vol. 2, page 4-70, Program D-13. The "500 foot strip" will be discussed in later comments dealing with Volume 2.

- p. 3-156 Procedure for Consistency Determinations: No mention whatsoever of the STREAMLINING ACT procedures. Does the Streamlining Act apply to FORA review/appeal process? 11

Vol. 2

- p. 4-2. The term "seamless" appears, and in context tends to contradict Vol. 1 references to Town & Village Centers with discernible and urban edges. 12
- p. 4-38. Residential Land Use Policy F-1. The City of Seaside shall strive to meet the need of the homeless population in its redevelopment of the former Fort Ord. 13

Council Member Mancini
Memorandum, June 5, 1996
Page 4

Although it was previously mentioned that PBC requests under McKinney Act provisions are being resolved by FORA, it should be noted that many of the plans for the University Village District (Polygons 18, 20e, 20h) could be seriously altered should McKinney Act agencies obtain most, if not all, the properties in those polygons. 13

p. 4-70. Program D-12. A strip 500 feet wide from the Caltrans ROW designated as a Special Design District (Polygons 15, 20e, 20h) could have an adverse affect the Gateway Regional Entertainment District and housing projects between Monterey Road and the Caltrans ROW. Five hundred feet is just under 1/10th of a mile or 100 feet short of two (2) football fields. This item needs to be discussed with Seaside officials. 14

Comments pertaining to the Business and Operations Plan and the EIR will be provided separately.

E

SIERRA CLUB



VENTANA CHAPTER

P.O. Box 5667 Carmel, California 93921 408 • 624 • 8032

Faxed to 883-3675

June 6, 1996

Fort Ord Reuse Authority
100 12th St
Bldg. 2880
Marina, CA 93933

Greetings:

We would deeply appreciate a one-month extension of the due date for comments on the reuse plan and DEIR which was recently issued.

The document is so large that a comprehensive review by the few knowledgeable volunteers in our organization would be difficult to provide by the current deadline of 15 July 1996.

Thank you for your consideration of this request.

Sincerely,
VENTANA CHAPTER, SIERRA CLUB

Arthur Mitteldorf, chair
Water Committee

373-3694
942 Coral Dr
Pebble Beach 93953

m o r a n d u m

Date : June 14, 1996

To : Projects Coordinator
The Resources Agency
c/o Nadell Gayou
1020 Ninth Street, 3rd Floor
Sacramento, CA 95814

From : **Department of Parks and Recreation**
Monterey District - (408) 649-2836/Cabinet 587-2836/FAX (408) 649-2847

Subject : Fort Ord Reuse Plan EIR, SCH #96013022

The Fort Ord Reuse Plan discusses proposals for land use developments and policies affecting the proposed Fort Ord Dunes State Park. State Park staff have been working with representatives from FORA and other local jurisdictions on elements of the reuse plan affecting the proposed state park. We are general in concurrence with the content of the information provided in the Reuse Plan EIR. Our comments are provided as clarifications and updates to the information in the documents. The preliminary Fort Ord Dunes State Park General Plan is currently being duplicated and should be sent out for public review within a few weeks.

The EIR and Reuse Plan maps generally use the name "Fort Ord Dunes State Beach." The State Park and Recreation Commission named the unit "Fort Ord Dunes State Park." There are important distinctions in the Public Resources Code for management of State Parks vs. State Beaches. The final documents should reflect the correct name to avoid confusion.

The EIR and Reuse Plan describes the future State Park as consisting of 1001 acres and proposed land uses including a 59-acre multi-use area, a 23 acre future desalination plant site, and 919 acres reserved for park and open space. Our July 1992 application to the National Park service for conveyance of the property estimated the acreage of the proposed park as totalling 1010 acres. This estimate was based on old maps. The recent maps reflect the significant coastal erosion that has occurred since the original maps were prepared. Our current estimate is that the future park will total 885 acres, including 48 acres of sandy beach, 305 acres of coastal dunes, and 532 acres of disturbed habitat.

Of the existing land base in these zones, our preliminary plan calls for preserving and restoring all of the sandy beach and coastal dune zones, and 394 acres in the disturbed habitat zone as openspace. Development of recreational and infrastructure facilities and reuse of existing structures would be limited to the remaining 137 acres in the disturbed habitat zone. This allocation of the property would maintain 700 acres available for habitat preservation and restoration in keeping with the Habitat Management Plan requirements.

2

Land uses in the preliminary State Park general plan for the 59 acre multi-use zone identified in the Reuse Plan include reuse of Stilwell Hall, development of a 40-80 unit lodge and restaurant, and development of a day use coastal access parking area. We anticipate that a significant portion of that 59 acre zone identified in the Reuse Plan will remain in openspace and be restored to native habitat. Although we hope to reuse Stilwell Hall as a visitor center and for other uses as long as it is safe and practical, our plan recognizes that the building will eventually be undermined by coastal erosion requiring that it be removed.

The Reuse Plan identifies a 23 acre future desalination facility site in the area of the abandoned main garrison sewage treatment plant. The preliminary State Park plan acknowledges that development of this facility will be accommodated in the State Park if it is determined not to be feasible to locate it east of the freeway. If it is developed, we would expect that the above ground portion of the facility would be limited to the 5 acre area within the present fence line of the abandoned sewage treatment plant. When the desalination facility is developed the lead agency will need to work with our department to obtain the necessary easements and/or use permits.

3

During development of the Reuse Plan and the State Park Plan, the concept of developing a regional multi-agency visitor center has been discussed. The concept is for a single facility that could provide public information to visitors regarding points of interest, where to go and what to see. The facility could also serve as a center for interpreting the natural and cultural history of the area. It is anticipated that the agencies involved would include the local, state, and federal resource agencies, local and county governments, and the universities. In our planning process Stilwell Hall was originally envisioned as the site for this facility but the limited freeway access to Stilwell Hall and the limited life of the building due to coastal erosion caused us to suggest an alternative site at the northwest corner of Light Fighter Drive and First Avenue. During preparation of the Reuse Plan the FORA consultants identified possible traffic circulation problems associated with this location and suggested another location along Eighth Street as part of a proposed historic district. The CSUMB master planning process may identify a site for such a facility on the campus. The preliminary State Park Plan includes the Light Fighter Drive location as a possible alternate site for the visitor center while recognizing the proposal for the Eighth Street site in the Reuse Plan.

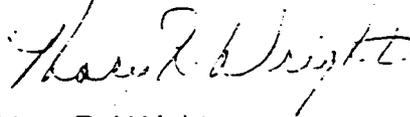
4

Whatever site is ultimately chosen, State Park staff hope to work cooperatively with the affected jurisdictions to help see this concept implemented.

The most controversial issue in the State Park planning process has been the proposal that the State Park include a coastal frontage road connecting Sand City and Marina. After carefully analyzing this proposal and considering public input on this issue, the State Park Plan does not include the proposed through road due to the road's potential significant impact on the park. The State Park plan does include coastal access parking at the north and south borders of the park and a through north-south recreational trail. The State Park plan also shifted the main day use access to the park from the First Street underpass to the Eighth Street overpass to better match the Reuse Plan. After considering the issue for several months the FORA Board decided not to take a position on the coastal road and the road is not included in the Reuse Plan. Although the coastal road is not included in the preliminary State Park plan it is recognized that coordinating access between the park and rest of the Reuse Plan area is vital to successful implementation of both plans. State Park staff are looking forward to working with FORA and the local jurisdictions to coordinate implementation of our plans.

If you have any questions about these comments please contact Ken Gray at (408) 649-2862.

Sincerely,



Mary R. Wright
District Superintendent



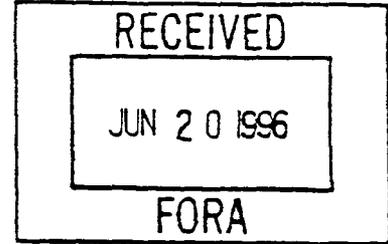
CITY OF DEL REY OAKS

650 CANYON DEL REY ROAD • DEL REY OAKS, CALIFORNIA 93940

OFFICE OF

Mayor

TELEPHONE (408) 394-8511



June 10, 1996

Mr. Les White
Executive Director
FORA
Twelfth Street
Marina, CA 93950

Re: FORT ORD REUSE PLAN / DRAFT EIR

Dear Mr. White:

Thank you for the opportunity to review the four volume Fort Ord Reuse Plan and Draft Environmental Impact Report. This massive undertaking appears to be sound and factual overall, but it has a number of major problems that must be corrected before further distribution to the public.

Of prime concern is the failure of the documents to acknowledge the role of proposed city annexations. This problem for the City of Del Rey Oaks was conveyed to you in a letter from the City Manager in April (attachment A) This situation applies not only to the City of Del Rey Oaks but to the City of Monterey, and potentially to the cities of Seaside and Marina. The text and maps in the Reuse Plan must be consistent, reflect FORA policy, and state the facts.

A point that requires immediate attention is the fact that in January of 1993, Del Rey Oaks sent a formal letter to LAFCO (attachment B) with a map showing the city's proposed annexation area at Fort Ord. This is not mentioned in the text or referenced anywhere in the document.

There are other technical problems and mistakes in the document that need immediate attention including new page IV-18 (distributed at the admin committee meeting of 6/6/96) that has a dramatic impact on the role and financial future of FORA. These numbers are referenced in numerous places in the text and must be made consistent throughout all of the sections to convey the true nature of the overall financial picture.

I appreciate the time and effort you and your staff have invested in these documents. At our meeting on June 12, 1996 we will share in detail our analysis of errors that should be corrected immediately, and identify longer range changes that should occur in the final document.

Thank you for your courtesies and prompt attention to these important issues.

Sincerely,



Jack D. Barlich

cc: Steve Endsley, City Manager
Joe Cavanaugh, Community Development Consultant

JAC:ap



(A)

CITY OF DEL REY OAKS

650 CANYON DEL REY ROAD • DEL REY OAKS, CALIFORNIA 93940

OFFICE OF
City Manager

TELEPHONE (408) 394-8511

April 5, 1996

Mr. Les White
Executive Officer
Fort Ord Reuse Authority
100 12th St., Building 2880
Marina, CA 93933

Re: Comments on Reuse Plan and EIR/EIS

Dear Mr. White:

I have made the following general comments to Ann Hebenstreit and Jim Feeney of your staff, and Michael Groves and Stephen Sheppard of the consultant team:

We have been concerned that the Del Rey Oaks projects included in the Base Reuse Plan, and sited on Polygons 31a, 31b and 29a, have been aggregated under the County of Monterey. This makes it difficult to pull out numbers and ideas for analysis, and gives the false impression that Del Rey Oaks' projects are somehow lesser than other projects included in the Plan. Examples of this are the Summary Land Use Concept tables. Barring full disaggregation of all data, we would suggest some kind of summary table for the Reuse Plan and Environmental documents that lists all of the land use agencies, including Del Rey Oaks, similar to what is contemplated for UCSC. An example of a good handling of this issue is found in the description of the County South Gate Planning Area on page IV-6 of the Comprehensive Business Plan, which references Del Rey Oaks specifically, and Table 4-7 of the Public Services Plan, which breaks out useable statistics for Del Rey Oaks' projects. Table 4-12 of the same document is an example of aggregated data that seems misleading.

In addition, a number of the maps used in the EIR, EIS, and Reuse Plan seem to be inaccurate or inconsistent. For example, renderings of Polygons 31a and 31b are not always accurately split between the FORA Board affirmed Natural Area Expansion (NAE) for 31a, and Office Park (OP) for 31b. Figure 4.1-4 of the Reuse Plan, Draft Sphere of Influence and Annexation Requests, appears to evidence this problem, with 31a not split apart, and City of Monterey annexation territory inaccurately labeled 31b. Alternatively, Figure 6.2-1 of the Draft EIR, Alternative 7 Land Use, appears to have the right designations and dimensions. And yet, in the EIS, Table 3-2 relative to Alternative 7 shows 31a and 31b correctly listed as County/Del Rey Oaks, and Polygons related to 29a incorrectly listed as County/Monterey. These inconsistencies seem to be

herent throughout the documents.

I hope this helps strengthen the final products. The City of Del Rey Oaks continues to be an enthusiastic member of FORA, and fully expects to complete the FORA Board approved projects previously planned for Polygons 31a, 31b and 29a.

Thank you for your courtesies.

Sincerely,

A handwritten signature in cursive script that reads "Steve Endsley".

D. Steven Endsley
City Manager

DSE:ap

cc Mayor Barlich
Vice Mayor Russell



(B)

CITY OF DEL REY OAKS

650 CANYON DEL REY ROAD • DEL REY OAKS, CALIFORNIA 93940

OFFICE OF City Clerk

TELEPHONE (408) 394-8511

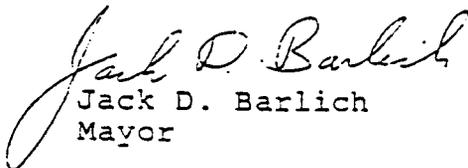
January 15, 1993

Mr. Jim Cook
Executive Officer
Monterey County Local Agency
Formation Commission
P.O. Box 180
Salinas, California 93902

Dear Mr. Cook,

I am submitting the enclosed map with the proposed Del Rey Oaks city limits on Fort Ord. This is in response to your January 8, 1993 request for areas that the City of Del Rey Oaks may wish to annex within Fort Ord. It is my understanding that this map will only be used to prepare a financial impact analysis of the Fort Ord Reuse Groups' Preliminary Initial Reuse Plan. You will note that this is a change in the map you may currently have. The map I am sending you has not been approved by the city council. Consequently, we reserve the right to request different boundaries in the future.

Sincerely,


Jack D. Barlich
Mayor

Enclosure

City Manager, City of Seaside
City Manager, City of Sand City
City Manager, City of Marina
City Manager, City of Monterey
Veronica Ferguson, County of Monterey
✓ Joseph Cavanaugh, Coordinator, Fort Ord Reuse Group

City of Del Rey Oaks Fort Ord Re-Use Plan Area of Interest

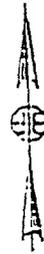
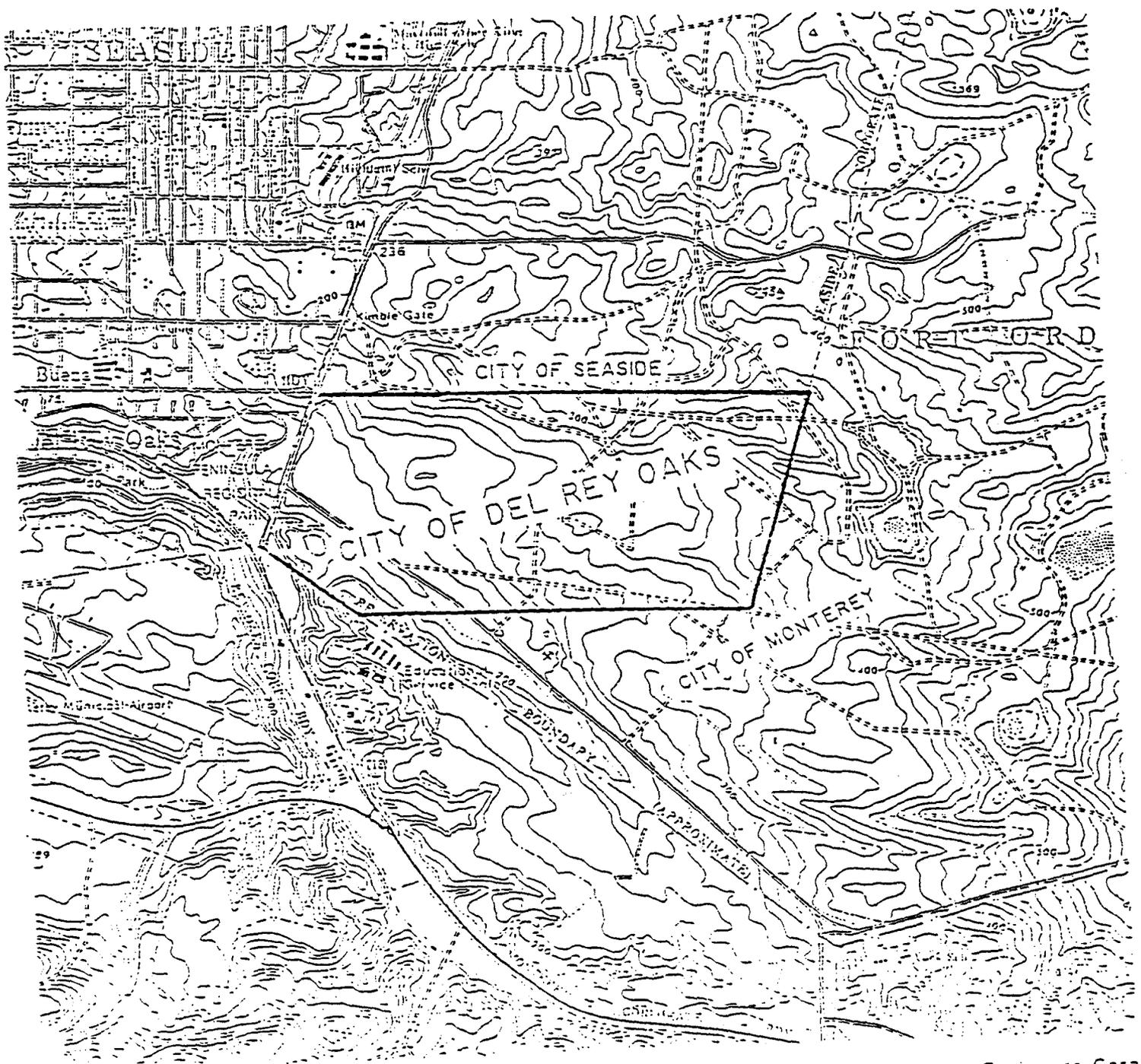


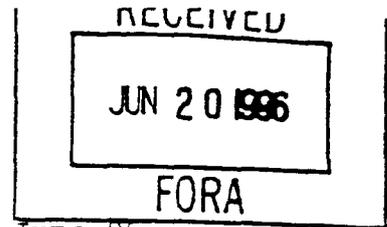
Exhibit A



SCALE: 1" = 2000'

Neill Engineers Corp.
January 22, 1993

LAURENCE W. DICKEY
P.O. BOX 223298
CARMEL, CA 93922



19 June 96

Les White ,Executive Manager
Fort Ord Reuse Authority
100 12th Street Bldg 2880
Marina CA 93933

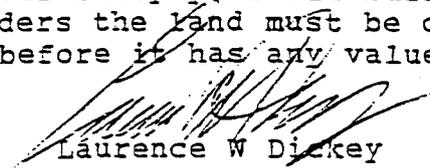
Les White,

It seems to me and Curt Gowdy of Fort Ord Toxic Project agrees,if the lead based paint applied by the Army to its now abandoned wood buildings,places them in the "toxic" category,there should be no question the Army is responsible for their removal and disposal(Refer Defense Environmental Restoration Program which requires and funds Army to remove toxic structures on any military base)

Potential developers of the now 4000 acres still available for private owners in the latest and pending FORA Master Plan (before federal,State agencies ,homeless and welfare providers take more)are already questioning the promises of water,infrastructure,transportation and are not likely to accept demolishing and disposing toxic buildings

I suggest FORA authorize you to negotiate firmly with the Army to clear and clean the toxic sites OR tranfer the land and buildings,directly and freely,to the now contiguous jurisdictions for their own site preparation and sale to private owners

The idea of a \$400,000 pilot project to determine what can be recycled from 1200,over fifty year old buildings is preposterous when one considers the land must be cleared and cleaned,regardless of cost,before it has any value in the future.


Laurence W Dickey

PS I attended your media briefing last Monday.The latest Master Plan,now scaled down and projected out twenty years, is still too grandiose for this out of the way peninsula.It lost credibility for me when Michael Groves,President of the EMC Planning Group,assured reporters there is natural water available for 38000 residents and other requirements projected to 2015 but,if not, a desalination plant would cover the shortfall for up to 71000 residents and other requirements,projected out to ultimate build-out.His first statement is not proven; hydrologysts are still uncertain about the limits of the sub-basins which make up the El Toro Basin acquifer. His second statement is not true;desalination is an alternative which has been under detailed study for several years and is known to be very expensive to build and operate,demanding daily high cost electrical or fossil fuel energy.Improved storage,recovery and reclamation of natural water,along with conservation measures is the other alternative for the Monterey Peninsula

LWD

MEMORANDUM



Date: June 23, 1996

To: Mayor/City Council
 Tim Brown, City Manager
 Dennis Potter, Planning Services Manager

From: Council Member Mancini

Subject: Public Draft **Fort Ord** Reuse Plan - App. B: Business & Operations Plan

On June 5, 1996, you were provided my comments about Volumes 1 & 2: Context and Framework and Reuse Plan Elements. Provided herein are my comments about FORA's Business and Operations Plan. Aside from inconsistencies in growth figures, jobs to be generated between 1995 and 2015, development and absorption potential estimates, the consultants have done an excellent job of explaining (1) SB 899, (2) SB 1600, (3) pros/cons of land-use agencies forming Redevelopment Agencies (RDAs), and (4) impact/special fees.

The most accurate (and profound) statement made in the three volumes can be read on p. II-3, Multiplicity of Local Jurisdictions. Nothing could be truer.

"Nine different local governments are represented on the FORA Board. Three will have major jurisdictional interests within the plan area. With this multiplicity of entities will inevitably come a **multiplicity of agendas** and complexity of decision-making. This could make it more difficult for FORA to maintain the integrity of the Plan and to speak with one voice to the private sector with regard to the development agenda and process at Fort Ord. The ULI has stressed the importance to the private development community of a clear, consistent and predictable regulatory environment." (**emphasis added**)

Comments.

p. II-4. 2d para. from bottom. "AMBAG forecasts a gain of 88,000 jobs between 1995 and 2015, of which about 90 percent, or 79,000 jobs, would be captured by Monterey County." 2

Specifically, what percentages are expected to be captured on Fort Ord and the Salinas Valley, respectively? Where will these 88,000 workers work, where will they reside or commute from, and what jobs will they be performing?

The next paragraph indicates that "the Monterey Peninsula has the potential to capture between 25 and 35 percent of county employment growth, or between 20,000 and 25,000 jobs between 1995 and 2015."

Yet, Exhibit 2, p. II-5 indicates another set of figures (a growth of 79,400 instead of the 88,000) -- a difference of 8,400 jobs. Of that 25 - 35 percent to be captured on the Peninsula, how many will be attributed to Fort Ord? We should be more specific in providing information ONLY as it pertains to Fort Ord.

p. II-10. **3. Residential.** 2d paragraph starting with "SKGM...." and Exhibit 3, p.II-7, Fort Ord Development and Absorption Potential. Figures in 2d paragraph do not address the 1,253 existing CSU units; only address 1,300 of the 1,522 existing units (short 222); do not address units in Sun Bay Apartments (291), nor the 1,590 units in a reconfigured POM Annex. No comments on the future of Borstrom Park. 3

Exhibit 3 (p.II-7) indicates a total of 9,025 units by 2015, yet on p. IV-12, **2015 Scenario**, there is a total of 12,853 housing units -- 5,393 institutional (non-market generated) and 7,460 market-generated units.

Figures regarding housing units again become confusing when one begins to look at Exhibit 7, Summary Land Use Concept: 2015 Scenario, and Exhibit 8, Summary Land Use Concept: Ultimate Development. Total Development/Dwelling Units are listed at 13,366 with a planned future development of 8,866 for an ultimate total of 22,232. Exhibit 8 lists a total 22,232 units -- 8,193 to CSUMB, 1,590 units at the POM Annex, and 12,449 housing units. There was no mention of the 6,277 housing units proposed for Monterey County properties on p. II-10. Someone needs to sit down and recalculate all figures relating to housing units. Just exactly how many dwelling units are envisioned? Fig. 1 (p. II-8), Annual Absorption By Land Use, and Fig. 2 (p II-9), Cumulative Absorption By Land Use Type should incorporate ALL existing, proposed (including POM Annex), student/faculty, etc., housing/dwelling units.

p. II-13. 2d bullet from bottom. "Access between Fort Ord and Silicon Valley is a major concern." 4

Improvements of highway access from Silicon Valley, be it via Hwy 84-101-156-1, or Hwy 280-880-17-1 shouldn't be the sole responsibility of FORA. Transportation needs should be addressed by Caltrans and/or County agencies. While FORA should address transportation issues impacting on the former installation, it must also recognize the fact that funding sources from state and county coffers will be sparse (if any funding is forthcoming at all). A funding source needs to be developed (other than impact fees) to address increased LOS on all routes out of the Santa Clara/San Jose/Gilroy areas.

p. III-3. B.1. **Definition of a Single Location Name for Fort Ord Properties.** 5

The private development community throughout California, homeless & non-profit (nation-wide), educational institutions, federal/state/county agencies, and many other private/public agencies do not appear to have problems with "former Fort Ord" identification -- much less getting here to inspect the properties. To establish a single location name would be another example of **discernible edges** with "definable entries and structure." The term "seamless" (Vol. 2) then loses its meaning.

p. III-13. **Low-density Single-family Detached.** SKGM specifically directs their comments towards the "New Golf Course Community District" (Polygon 20a). They indicate the "approximately 12 acres will be required to accommodate this demand ... of four units per acre." 6

p. III-13. Mentioned in Volumes 1 & 2 is a 500 foot wide strip to be designated as a **Special Design District**. What affect will this 500 foot strip have on the availability of the 12 acres? And what affect will the strip have on the density (four units per acre)?

p. III-15. **Neighborhood Retail Center**. "Located in the University Village within the University Planning Area in Seaside (Polygons 20e and 20h), the property is located at the strategic intersection of Gigling & North-South roads."

No mention of the numerous PBC/EDC requests by public, homeless, non-profit, religious, and other agencies since the area designated as "University Village" (Polygon 20e) in Seaside has been declared as **EXCESS II** by the Army. The financial impact for services -- fire/police, public works, permits, infrastructure, etc. -- needs addressing. What happens if the majority of **EXCESS II** buildings & lands do eventually end up in the hands of the tax-exempt entities?

p. III-16. **Regional Retail Opportunity Site**. Identified as being located in both Seaside and Marina (Polygons 15 and 2b). Consultants need to address (once again) the affect the **500 foot strip Special Design District** will have on Polygon 15. This polygon encompasses the main entrance to Fort Ord. At what point from the Caltrans ROW does the 500 foot strip begin? If the 500 foot strip starts at the eastern edge of the Caltrans' 100 foot ROW, then we are talking about a 600 foot swath from the edge of the highway shoulder -- the length of two football fields or 200 yards.

p. III-17. **7. Golf Course Sites**. SKMG's understanding that the Army intends to maintain ownership of the courses etc., has been discussed with Tim and Dennis. Les White (FORA) has been made aware of SKGM's comments, and action will be taken to correct the "mis"understanding.

p. IV-9. **Seaside University Planning Area**. As mentioned earlier, this area has been declared as "excess" by the Army, and is therefore subject to McKinney Act screening. Numerous state/county, homeless, non-profit, educational, and religious agencies have submitted PBC/EDC requests for properties in the Planning Area.

p. IV-10 **Planned Residential Extension Districts**. "These are three discreet: locations...."

Identify the "discreet" locations by polygon. Nothing is discreet in this Reuse Plan.

p. IV-13. **Seaside Gateway Regional Entertainment District**. This area is located in Polygon 15, and could be seriously impacted by the **500 foot strip "Special Design District"** requirements that could be imposed by FORA. The Cities of Seaside and Marina should have been contacted before this requirement was conceived.

p. IV-17 thru p. IV-22 **Development Scenario: Preliminary Financial Results** 13

The lack of empirical data obtained from other military base closure(s) throughout California precludes a comparative analysis of data presented in Exhibit 9 (Base-Wide Pro Forma) projections. There is nothing to either substantiate nor disprove SKGM's projections/assumptions. It is recommended that all figures be revisited to ensure consistency and accuracy with other projections throughout the plan.

p. IV-28. Last paragraph. "The TEAM strongly recommends ... timely completion of Highway 156 improvements be added to FORA's CIP responsibilities." 14

Financing of \$16 million for Hwy 156 improvements will not be an easy task as pointed out on p. PFIP 1-23, para. 1.6.1 Implementing the Cities-County Road Impact Fee. This discussion takes place again on page PFIP 5-23, Cities/County Transportation Impact Fee and Mello-Roos Special Tax for Transportation Improvements.

Developers with any experience in dealing with California land-use entities are well aware of the potential costs and other difficulties they can expect at Fort Ord. While Fort Ord may be considered as a "model base-closure", it is not the first military base to be closed in California.

p. PFIP 2-12. Land Use Inventory and Demand Forecasts - General Facilities 15

Once again, **TOTAL Residential** figures need to be reviewed and cross-checked with similar residential dwelling unit charts & figures in all volumes to reflect the same numbers throughout; ergo, some degree of consistency.

p. PFIP 3-36 thru 3-82. Paragraph 3.5.6 **Transition Strategy for Water Supply and Distribution System** & Paragraph 3.5.7 **Transition Strategy for Wastewater Collection System**. 16

No major concerns except on page 3-48 Assumptions. The only concern refers to the assumption "Public agencies served will not be entitled to either payments in lieu of property taxes or franchise fees from system earnings."

Why will municipalities (public agencies) "not be entitled" to the referenced taxes and fees? Most municipalities, if not all, receive property taxes from privately-owned entities that provide a utility-type service to customers in their jurisdictions. Franchise fees are usually paid by utility companies on a contractual basis in order to do business within that city. These franchise fees can play a significant role in generating revenues in that municipality.

p. PFIP 4-1 et seq. **Burden Analysis** (in particular, para. 4-7, p. PFIP 4-5.) Burden of Financing On-Going Public Operations. 17

Of major concern, as pointed out earlier, is the impact on cities that will have to provide public operations/services to non-profit agencies, which at some future date, could be in receipt of properties under the McKinney Act. At present, the City of Marina is faced with providing municipal services to CSUMB housing, in addition to another 190 houses or buildings that will eventually be conveyed to educational or non-profit agencies.

At its May 10, 1996 meeting, FORA representatives received an update on the disposal process occurring in EXCESS II area (Agenda item no. 4h). Accordingly, ALL the properties in EXCESS II have been requested. Most of these requests (38 of 48) are from non-profit cultural, educational, religious, state/county agencies. While FORA hopes to become the final arbitrator in resolving the requests, the issue of financial burdens on the municipalities providing services must be addressed. 17

The Reuse Plan calls for a University Village in the EXCESS II area, and alludes to the financial benefits inherent in such a development. What do the cities of Seaside and Marina do should a significant portion of the ever-dwindling "fifteen percent (15%) of the former Fort Ord" which "remains available for private development" end up in the hands of the non-profit agencies? (Quotes are from FORA Chair Barlich's letter to the Dept. of Transportation dated April 28, 1996). This letter was also in the May 10th FORA packet.

p. PFIP 5-1. **PFIP 5 Public Facilities Financing Plan.**

Para. 5-3, Summary of Financing Plan is a fairly objective presentation of how financing for public improvements should "stand alone", and that no additional burden(s) "should be placed on the existing tax base of any jurisdiction in Monterey County." 18

Explanations of impact fees, special taxes, cash flows, LOS, land value analyses, debt service, and capital costs, etc., are presented without embellishment. As mentioned earlier and reiterated on page PFIP 5-6, "Sophisticated developers ..., will understand very well the residual land values." They will negotiate terms, etc. that "permit a reasonable profit to be made."

PUBLIC SERVICES PLAN

Reasonable assumptions appear to have been made. The most enlightening comments, however, relate to Tax Allocation Methodologies (Table 3-10, p. 34), and the tax increment dollars that could be available to Marina and Seaside without FORA as the RDA. Excellent breakdown of property tax distribution (SB 1600) on page 33. Best diagram I have ever seen. 19

I am sure there are some areas that need revisiting/reevaluation. Hopefully, areas that I may have overlooked will be caught by others. Collectively, other comments will be incorporated into a single packet for review/comment by FORA consultants/staff & Board.

Comments on the draft EIR will be forthcoming under separate cover.



Thomas M. Mancini

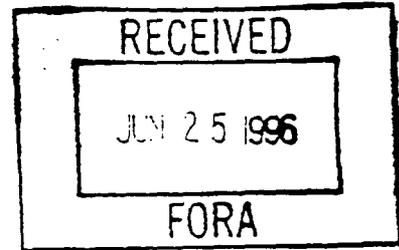
Letter Box

June 24, 1996

The Herald

P.O. Box 271

Monterey, CA 93942



Good grief! A four volume Environmental Impact Report addressing the development proposed for the Fort Ord property. A horrendous network of freeway/expressway/interchanges that will dump a lot more traffic into our communities. And we have only until July 15 to examine this E.I.R.

These plans have already been given the blessing of Caltrans, TAMC, AMBAG, our Board of Supervisors, Del Rey Oaks City Council, etc. But the ordinary citizen has been left out in the cold.

The bureaucrats tell us otherwise, that the agencies' meetings where these things were discussed were open to the public. But these meetings were certainly not widely publicized to alert and really invite public input.

There is only one copy of the E.I.R. in each of ten locations in the county. This means one copy for every 30,000 people. The first time I checked the one in Monterey library it hadn't even been cataloged. On my second visit I discovered (and I'll wager my neighbors even now don't know) that little York Road at Laguna Seca is destined to become part of a new expressway which will pick up a new freeway from Salinas and then extend north to service hotels, golf courses, retail shops, etc. And yet we have only three weeks to examine this E.I.R. and give our comments to the Fort Ord Re-use Authority: that is if it is not already ¹⁰⁻¹ ₃

I don't think The People want any more freeways dumping
traffic into Del Rey Oaks or downtown Monterey. Further, I think
The People want real jobs for their children, not hotel and retail
jobs. Fort Ord has the earmarks of becoming an Orange County or
another San Jose, a metropolitan complex in our midst.

And where is the conscience of these politicians and bureaucrats
when they sacrifice our attractive community to urban sprawl?
And to make this action even more unseemly it was done without
the awareness of the public who are essentially outside the
"bureaucratic loop."

There is a meeting of the FORA group scheduled for July 1 at 7 PM
at the Oldemeyer Center in Seaside which invites public comment.

Gudrun Beck
Gudrun Beck

23765 Spectacular Bid

Monterey, CA 93940

655-8586

1154 Parkside #6
Salinas, CA 93906
20 June 96

F.O.R.A.
100 12th St
Bldg 2880
Marina, CA 93933

Honorable Ms. Hebenstreit:

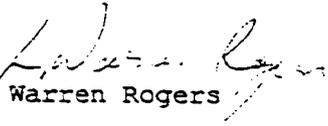
I'd like to propose that the Fort Ord Reuse Plan include a shooting range. The Fort Ord office of Moral, Welfare and Recreation that was still here after the troops left operated some rifle and pistol ranges for a while. Some of the troopers in the state department of Parks and Recreation feel that the demand they see justifies another range, but the costs of land around here are prohibitive. Why can't the state department of Parks and Recreation take over control and operation of the ranges that were once operated by the Ft. Ord/Army office of Moral, Welfare and Recreation? The costs of conversion for that use would be more minimal than any other use. Of course you might argue that there are practically no clients using that service, but the state department of Parks and Recreation might disagree.

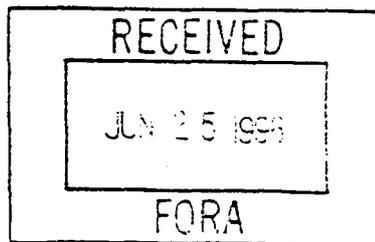
I heard something once that bears repeating.

If you're in Paris, you must see the Eiffel Tower. If you're in Venice, you must ride a gondola. If you're in Monterey County, you must go on a pig hunt.

Fact is that since Russian Wild Boar were introduced and proliferating in Monterey County and in Tennessee, boar hunting has grown in popularity. Three reasons exist for the rising popularity of pig hunting here, (1) they're a pest and people want them hunted, (2) they're somewhat dangerous and make the hunt more thrilling, (3) the meat is delicious. Pig hunting is a unique offering found here and few other places that should be promoted and a rifle range is something that hunters use to check equipment that can't be checked elsewhere.

Thank you for your time and consideration


Warren Rogers



CITY HALL
BOX CC
CARMEL-BY-THE-SEA, CALIFORNIA 93921

27 June 1996

The Honorable Jack Barlich
Chairman
Fort Ord Reuse Authority
Building 2880
100 12th Street
Marina CA 93933

VIA FACSIMILE TRANSMISSION
883-3675

Dear Chairman Barlich:

In the absence of Mayor White, and as the Alternate Voting Member for the City of Carmel-by-the-Sea on the Fort Ord Reuse Authority, I wish to state the position of our City as being in full support of the suggestion made in your memorandum of 20 June regarding a request for extension of the review period on the Draft Reuse Plan/EIR. It is important to note that the Authority's Agenda for its Special Meeting of 1 July does not include an item specifically addressing this issue. As noted in the FORA Executive Officer's memorandum of 26 June, time constraints would indicate that such action should be taken at this meeting.

The four-volume Draft Reuse Plan/EIR will require careful reading in order to be thoroughly understood. Even those of us experienced in working with documents of this nature are finding the scope of the Draft Reuse Plan/EIR somewhat daunting; to anticipate that elected and appointed officials, as well as the lay public, could attain a sufficient understanding of the material in the three short weeks remaining before the close of the scheduled public comment period is, we believe, unrealistic.

Action taken today on the use of this extensive acreage will have a lasting -- perhaps permanent -- effect on the entire Monterey Peninsula; the quality of life for generations to come will be impacted, for better or for worse, by our decisions. We members of the Board of Directors of the Fort Ord Reuse Authority have been entrusted with the power to make those decisions; we must make them wisely and not in haste. Such decision-making can be best facilitated by the generation of as much public input as possible. This input must include work/study sessions among the FORA Board, FORA's planning staff, the public and the professional consultants engaged by FORA to develop the documents. It is our recommendation that

Hon. Jack Barlich
27 June 1996

Page 2.

any decision made regarding the time period for public comment take into consideration the fact that many, many persons leave the Peninsula during the months of June, July and August and thus would be unable to participate in these vital discussions.

Notwithstanding the July target date for a plan's adoption, the far-reaching magnitude of the decisions of today and the effect thereof on the realities of tomorrow certainly more than warrant the most careful attention we can give.

Therefore, the City of Carmel-by-the-Sea requests an extension of the public comment period on the Draft Reuse Plan/EIR for the re-use of the former Fort Ord property until at least 30 September 1996 and the scheduling of work/study sessions to allow for full public input. By copy of this letter to Congressman Sam Farr, we are requesting his assistance as needed in communicating our concerns about this matter to the appropriate federal officials.

Thank you for your consideration.

Very truly yours,



Barbara Livingston
City of Carmel-by-the-Sea
Alternate Voting Member

BL:sam

c: FORA Board of Directors
FORA Executive Officer
Congressman Farr
Members of the City Council
Members of the Planning Commission
City Administrator
Director of Planning and Building
The Carmel Pine Cone
The Monterey County Herald

BOARD OF TRUSTEES

CHAIRMAN

Th Ryan
y of Monterey
S ARY
George Boutonnet
County of Monterey

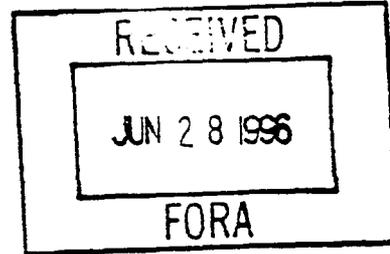
NORTHERN SALINAS VALLEY
MOSQUITO ABATEMENT DISTRICT
342 Airport Boulevard
Salinas, California 93905

Monterey (408) 373-2483 Salinas (408) 422-6438 Watsonville (408) 761-2483

MEMBERS

FAX: (408) 422-3337

John Frassetto
County of Monterey
Carl Hansen
County of Monterey
George Higashi
City of Salinas
Darlene Burkleo
City of Seaside
Michael Morris
Sand City
Douglas Stafford
City of Monterey
Fernando Manzanal
City of Marina
Jack Barlich
City of Del Rey Oaks



Date: 27 June 1996
To: Ann Hebenstreit, Planner
From: Peter B. Ghormley, Manager-Zoologist
Subject: Draft Documents: the Reuse Plan, EIR, and Operations Plan for the Former Fort Ord Military Base

Review of the above mentioned documents has provided some concern within the staff of the Northern Salinas Valley Mosquito Abatement District. It would appear mosquito and/or vector control on the former military base were not even mentioned. Significant effort was undertaken by the U.S. Army Preventive Medicine Group and contracted private sector Pest Control Operators to address these problems during the military's tenure on the post.

It would be less than prudent if these matters are not addressed in some part of the planning process. These matters are of direct concern to at least three agencies. The Vector-Borne Disease Section of the California Department of Health Services, the Monterey County Environmental Health Department, and the Northern Salinas Valley Mosquito Abatement District.

Time constraints have not allowed a detailed analysis. However, a few examples of potential problem sites for mosquitoes would include storm drains, catch basins, roadside ditches, vernal pools, wetlands, abandoned water treatment facilities, backyard containers, old tires, equipment stored outside, etc. Furthermore, the presence of fleas, ticks, yellow jackets, and many other arthropods of potential public health concern on Fort Ord must be noted.

The Northern Salinas Valley Mosquito Abatement District is willing to participate in discussions relative to mosquito and/or vector control on the former military base. Should further information be required, please contact this office.

7/1 FOIA

PUBLIC HEARING: TO HEAR PUBLIC COMMENTS ON DRAFT EIR REGARDING DRAFT REUSE PLAN

14 Bud Nunn of the Monterey Peninsula asked if there will be another public hearing prior to the closure of the comment period? Mayor Barlich replied this would be announced at the July 12th Board meeting. Mr. Nunn would like the Board to consider this and to have copies affordable to the average citizen plus workshops throughout the area.

Debra Mickelson - request extension of public review period, public workshops -written comments attached see #27

Larry Hawkins from Seaside - concern over the proposed residential densities for Seaside -written comments attached see #28

Larry Fenton - lost his trailer home in Seaside, looking for affordable housing for veterans on the former base-written comments attached see #29

Ed Leeper -concern over water and transportation issues; extension of public comment period and put this plan to a vote - written comments attached see #30

Laurence Dickey - concern over water supply, suggest EIR used as reference point for scaling down proposed maximum buildout - written comments attached see #31

15 Kris Lindstrom from Pacific Grove was looking at the water issue and there is inadequate water to support this development . He also looked at the mitigation measures in this EIR and sees program elements that have very grandiose ideas of studies and things to be done i.e., program C3.1 - the city/county shall work with MCWRA and MPWMD to estimate the current safe yields of those portions of the former Fort Ord overlying Salinas valley and Seaside groundwater basins to determine available water supply. This needs to be done now and then base the development on the planned sustained yield of the aquifer. The no project alternative is the only rational choice until this is done and the safe yield is known. Program item C3.2 - the city/county shall work with the appropriate agencies to determine the extent of seawater intrusion into the Salinas valley and Seaside groundwater basins and shall participate into developing and implementing measures to prevent further intrusion. This needs to be done now. The no project alternative is the only rational choice. CEQA is really clear in the State guidelines that mitigation measures must (1) avoid the impact altogether by not taking certain actions or parts of an action, (2) minimize impacts by limiting degree or magnitude of the action or its implementations, (3) rectify the impact by repairing, rehabilitating or restoring the effected environment, (4) reduce or eliminate the impact over time by preserving and maintaining during the life of the action, (5) to compensate for the impact by replacing or providing substitute resources for environments. The key is there is inadequate water supply and none of the measures in here are specific enough about the cost of this water, the feasibility of the reasonable

15 alternatives that are stated, importation, desalination. We all know there is a problem on the peninsula now and we need real solutions to move forward.

16 Becky Tyksinski from Monterey County - stated it is important that the comment period was extended in light of according to CEQA the basic characteristics of an EIR are that it is an unbiased document, that it is adequate and its major objective is a good faith effort toward full disclosure including complete description of the project. Rancho Buena Vista Coalition experience has consistently shown that the best environmental impact report analysis are local community members when provided with adequate time and education to be able to examine EIRs. FORA needs to provide, not only ample time for community examination, workshops as well including at least one in Salinas, preferably on a weekend or an off time. Two examples of public concerns with the adequacy of this draft EIR - one relates to the EIR being an unbiased document - there is a question as to how unbiased this document is when it fails to include as an alternative, a build-out that only uses safe, sustainable yield on-site water, leaving us with the only other alternative as no project at all. Secondly, another concern is that in discussing a program EIR is that a program EIR can have language that is so general concerning its overall plan that later on almost anything specific can be proposed which can be represented to fall within the guidelines of the original EIR and that can lead to a much lower level, if any at all, of further environmental review.

Sal Horquita -EIR needs to mention clean-up of toxic materials, ordinance etc.- *written comments attached*

See # 32

Curt Gandy -request extension of public review because DEIR presents "unusual circumstance", requests public workshops on the DEIR - *written comments attached*

see # 33

17 Barbara Brooks, Peninsula resident - does not believe the comment period has been extended far enough. It will change the face of this peninsula and needs to have as much public participation as possible. Has the process to this point complied with CEQA - it is her understanding it has not, in that, CEQA requires an Executive Summary which would be a number of pages instead of volumes that would detail what is in this project. To this point it has not been prepared and once the clock starts ticking the public should have that document in hand. She requests to get the document out and extend the public comment period a reasonable time after the public receives this document. She challenged the appropriateness of the program EIR- doesn't simplify the process sound like avoid - we should be looking at each thing that comes on line which is done by a staged EIR.

18 Sean Flavin on behalf of CAWS - Committee for Alternate Water Sources- he commends the EIR for recognizing the 2 primary constraints which face the development of Fort Ord which are water and traffic. If the water is not available then what is proposed, what measures would be considered for this project. The only thing reported is accelerate the development of other sources such as importing water, but not told from where it would be imported, and the construction of desalination plant.

- 18 The short term project should face the realities now rather than some later date. The long term project is 18,000 acre ft which is 25% over all the water the peninsula is presently using, and where will that come from. 1

- 19 David Dilworth said this project is too big. This is a slow-motion explosion with 70,000 people, 5 golf courses, 1700 hotel rooms. The no project is the only alternative that is appropriate given the information written so far. What is this we are creating - is it a special district under the laws of California or is it part of the county or is it its own city. Or is this some new district we can't figure out. Can we vote on what goes on here? Before you go forward with this project, we need a vote of the people of all the districts who are represented here and see what they think about it. 2

- 20 Ted Ciesla of Casa Ciesla Properties in Monterey - commented on the Comprehensive Business Plan which states it anticipates the needs of 6,500 housing units to 2015 - that equates to 342 units per year. The plan is based on a statistic which is around 5% vacancy rate and that figure is erroneous. We currently have a vacancy rate in rental housing of approx. 1% if not less. Today the Californian reported a 0% vacancy rate. He advises staff to do a critical review of housing vacancy rates and adjust their logic accordingly. 1

- 21 John Fisher of Pacific Grove - supports concept of phasing the project in until you know the transportation and water issues are taken care of. There are assumptions about the Hatton Canyon improvement being in place and there are people who do not want this and what happens to this plan then. There is an assumption the 68 freeway will be in place and according to Caltrans that is a 110ft cut or more into BLM property. Which population figures do we use? AMBAG has numbers but the difference in the numbers are great between 2015 and buildout vs AMBAG. Please go very slowly. 2

- Michael Houlemard from UCSC -UC incorporated 605 acres into the UC Natural Reserve System and this should be reflected in the planning documents; conflicts between numbers in the documents; no description of permitted use on the UC parcel between Imjin and Inter-Garrison Roads - *written comment attached see # 34* 3

- Clark Beck -concern over Route 68 alternative alignment traversing Fort Ord; would like extension of York Rd. removed from Fort Ord maps - *written comments attached see # 35* 4

- Yoko Whitaker -request study sessions and public hearings; would like detailed "executive summary" copies available, more copies at public libraries; DEIR too general, lacks details on transportation and water solutions; how are taxpayers to be affected by costs of development - *written comments attached see # 36* 5

- 22 Ed Stark from Carmel stated (1) there is not adequate roads and (2) there is not enough water. It sounds like the taxpayers will be forced to pay an exorbitant amount of tax to ensure the developments we need. He would challenge anyone on this Board. 1

18, 19, 20, 21, 22

22 to tell him where the water is coming from, where the roads are coming from and the cost and what is the cost to the taxpayers to this area.

Jim Hughes - concern about safety on beaches behind the dunes and need controlled beach access. - *written comments attached* *see # 37*

23 Mike Weaver representing Hwy 68 coalition - the coalition takes a dim view of the hotel and proposed golf course at Del Rey Oaks. The plan lines have been changed recently by Caltrans. They plan to actively oppose this project.

24 Sue McCloud - spoke on the process on democracy and not on the substance of the report. The Board needs to have focused workshops maybe one per issue so the people can comment. What is the hurry with this plan. We need to have an executive summary and there is a company which could help to see what the plans would look like or use a model to assist the public.

25 Leslie Crayne would like the board to think about the face of the community and leave it alone.

26 Winston Elstob from Pacific Grove - is impressed by the members on the Board and maybe the Monterey peninsula will be one city. He does not want the community to be divided up and sold to the world.

Terry Olesen asks FORA to publicize through TV or Coast Weekly and to continue to advertise. *Written comments attached.* *see # 38*

22, 23, 24, 25, 26

July 1, 1996

Fort Ord Reuse Authority
100-12th Street, Bldg. 2880
Marina, CA 93933

Verbal Presentation
Special Board Mtg. & Public Hrg.
7 pm - 986 Hilby Ave., Seaside

Re: Fort Ord Reuse Plan DEIR
Extension of 7/15/96 Public Review Period
Need for Public Workshops

For the Administrative Record

To the FORA Board:

An apprehensive citizenry comes before you today for our first opportunity to be heard on the Draft EIR for the Fort Ord Reuse Plan. The complexity of the DEIR and other documents released on May 31, 1996, creates an unusual situation. An extension of the current public review period is needed to allow the public, and others, sufficient time to analyze the information before us.

1

Public workshops are also needed prior to the close of the review period so that members of the public in all areas affected by the Reuse Plan may have meaningful questions asked and answered regarding the myriad of complex issues raised by the DEIR.

2

An array of reuse plans have been suggested to the public in the past. As an example, the reuse plan by FOEDA, Monterey, Del Rey Oaks and Sand City discussed in the 1992 Army DEIS, created a city of 250,000 people at the former base [Ft. Ord Disposal & Reuse, DEIS, Dec 1992, Vol I, pg 2-2]. None of the eight previous alternatives have been analyzed or mitigated under the CEQA guidelines. The Draft EIR released on May 31st is the public's first opportunity to begin to assess the effects of the project, as proposed.

3

The California Environmental Act mandates informed decision making and informed public participation. An extended review period and public workshops will foster informed participation. Anything less will prejudice the public's ability to formulate informed views on the adequacy of the Draft EIR.

Sincerely,

Debra J. Mickelson
P.O. Box 7591
Carmel, CA 93921
408-624-8755

cc: Sierra Club
Rancho Buena Vista Coalition
CAWS
Salinas Valley Growers & Shippers

LAURENCE R. HAWKINS, JR.
1875 Abraham Court
Seaside, CA 93955-4101
(408) 394-1231

June 30, 1996

Fort Ord Reuse Authority
100 12th Street, Building 2880
Marina, CA 93933

RE: Fort Ord Reuse Plan and EIR

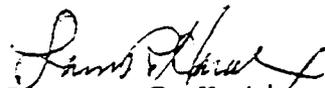
My comments regarding the Reuse Plan and its EIR are limited to the proposed residential densities for the Seaside areas contained within polygons 20(a), 20(b), 20(h), and 20(g), as listed in the attached table.

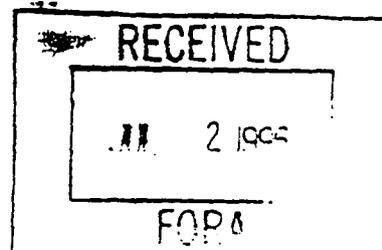
As shown in the table, the present military housing densities in the "Medium Density Areas" range from 3.25 to 5.26 dwelling units per acre, for an average of 3.90 per acre. The FORA Plan proposes to increase that density two to three-fold, with a range of five to ten dwelling units per acre. A more reasonable and environmentally-sound cap should be set at five per acre, with minimum lot size of 8,000 to 9,000 square feet.

The last thing Seaside needs is more 6,000 square feet lots. As any planner knows, the developer will insist on the high end of any density range, and will swear on a stack of Bibles that the "numbers" won't allow anything less.

The Plan's "High Density Area" proposes a density range of ten to 20 units per acre. A cap of ten units per acre, to allow for another town-house project similar to Sun Bay in more in keeping with the adjacent Ord Terrace neighborhood in Seaside. Greater density is not acceptable, nor is the another trailer park.

Sincerely,


Laurence R. Hawkins, Jr.



EXISTING AND PROPOSED RESIDENTIAL DENSITY
Fort Ord Reuse Plan and EIR, May 1996

POLYGON NUMBER *	GROSS ACRES	EXISTING DWELLING UNITS	DWELLING UNITS (DU) PER ACRE	FORA PLAN LANDUSE DESIGNATION **	FORA PLAN DENSITY, DU/ACRE **
MEDIUM DENSITY AREAS: Hayes, Stilwell, GOQ's **					
20(a)	95	500	5.26	SFD-Med Density	5-10
20(b)	95	400	4.21	SFD-Med Density	5-10
20(h)	241	787	3.25	SFD-Med Density	5-10
TOTALS	432	1,678	Average DU/ACRE: 3.90		
Average lot size, 6,000 SF; Range, 4,000-8,000 SF**					
HIGH DENSITY AREA: Sun Bay Town Houses, Brostrom Park (mfg. homes) **					
20(g)	89	517	5.80	MFD-High Density	10-20
No average lot size.** If sub-divided, 4,356-2,178 SF per lot.					
SOURCES: * Fig. 3.3-1, Vol 1, FORA Plan, May 96 ** Table 3.4-1, Vol 1, FORA Plan, May 96					



Fort Ord Reuse Authority

DRAFT FORT ORD REUSE PLAN/EIR COMMENTS FORM

If you use this form to submit your comments, it is important that you include your name, address, and phone number below. You can use this form to submit your comments, or you can mail or fax your written comments directly to FORA. Your comments must be received no later than 5:00pm on Monday, July 15, 1996 unless otherwise announced.

Comments should be directed to:

Fort Ord Reuse Authority
100 12th Street Building 2880
Marina, CA 93933
Phone: (408) 883-3672 Fax: (408) 883-3675

*Note: 7-2-96
called L. Fenton w/
information pertinent
to his issued permit
(Non-Plan/EIR)*

PLEASE PRINT THE FOLLOWING INFORMATION:

Name: LAWRENCE B. FENTON
Address: 5122 COE AVE #9
City: SEASIDE, CA Zip: 93955 Phone: (408) 899-5490

COMMENTS: (please also use the back of this sheet or attach additional sheets if needed).

RE: DRAFT REUSE PLAN

I AM A DISABLED AMERICAN VETERAN CURRENTLY RESIDING AT FT. ORD / SEASIDE. I HAVE RECENTLY RECEIVED NOTICE THAT THE TRAILER HOME IN WHICH I AM LIVING IN HAS BEEN RENTED TO SOMEONE ELSE, AND THAT I NEED TO MOVE OUT BY JULY 13TH, 1996.

I DO NOT APPRECIATE THE MANNER IN WHICH I HAVE BEEN ADDRESSED BY THE RINC ORGANIZATION, WHICH TO MY KNOWLEDGE OWNS THE TRAILER PARK. THIS ORGANIZATION KNOWS THAT I'VE BEEN LIVING HERE FOR OVER 8 MONTHS, YET I WAS NOT OFFERED A LEASE AGREEMENT TO TAKE OVER PAYMENTS OF THE TRAILER HOME FOR RENT. THIS LEAVES ME WITH TWO OPTIONS: THE FIRST IS TO GO TO COURT VIA THE UNLAWFUL DETAINOR PROCESS TO PRESS MY CASE WITH THE LANDLORD / OWNER OR HIS AGENT, AND THE SECOND IS SIMPLY TO MOVE OUT. 22-1

I DO NOT WANT THE FIRST OPTION, AND I CAN'T AFFORD THE TIME AND TROUBLE IT WOULD BE TO PURSUE THIS MATTER IN A LEGAL FORUM.

SO, IF I HAVE TO MOVE OUT, WHERE CAN I GO?

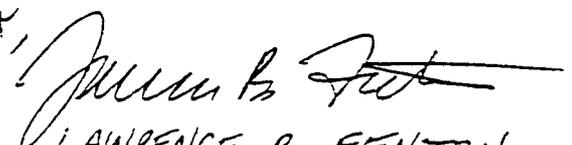
ALL I HAVE TO DO IS LOOK OUT MY WINDOW AND SEE ALL KINDS OF BOARDED UP HOUSING, BUT WHY IS IT NOT BEING USED? I WOULD LIKE TO ASK THE DRAFT FORT ORD REUSE COMMITTEE IF THERE IS AVAILABLE, AND AFFORDABLE HOUSING FOR VETERANS HERE ON THE FORMER BASE. IF NOT, THEN WHY?

I SERVED MY COUNTRY AND RECEIVED AN HONORABLE DISCHARGE, YET I'VE BEEN CHARGED WITH TRESPASSING IN MY OWN APARTMENT ON JULY 7, 1992 IN REDONDO BEACH, CA., KICKED OUT BY L.A. COUNTY SHERIFFS FROM MY RESIDENCE ON JUNE 13TH, 1995, VAN NUYS, CA AND NOW THIS.

IF ANYONE DESERVES A PLACE TO LIVE IN THIS COUNTRY, IT HAS TO BE OUR VETERANS. WHY ARE WE TREATED LIKE "SO MUCH TRASH" IN OUR COURT SYSTEM, AND BY THOSE WHO ARE FORTUNATE ENOUGH TO OWN OR RENT OUT PROPERTY?

THIS IS NOT A SITUATION THAT I CAN MULL OVER FOR A VERY LONG TIME, BECAUSE I ONLY HAVE LESS THAN TWO WEEKS TO NOW FIND A PLACE TO LIVE.

COORDIALLY,


LAWRENCE B. FENTON
5100 COE AVE. #9
SEASIDE, CA. 93955
(408) 899-5490

Save Our Waterfront Committee

P.O. Box 1915
Monterey, California 93940
408-373-0823
Fax # 408-649-4031

June 30, 1996

TO: Fort Ord Reuse Authority, (FORA)

SUBJECT: Public Comments on the Fort Ord Draft Reuse Plan/EIR

The FORA Draft Fort Ord Reuse Plan will overwhelm two vital infrastructure components of North Monterey County and the Monterey Peninsula, roads and water. | 1

Development at Fort Ord should be based on available road and water capacity at this time. CAL-TRANS will not have sufficient funds to provide adequate road improvements for the Fort Ord Reuse Plan in the foreseeable future, at least not within the next 20 years. | 2

No responsible government agency believes that there is enough water for this massive development. The EIR needs to provide believable proof that there is adequate water for this Plan. | 3

Concerned citizens have not had time to digest and study this EIR. The Save Our Peninsula Committee urges the Fort Ord Reuse Authority to extend the public comment period until September 15, 1996. | 4

Based on newspaper reports this is an irresponsible, out-of-control development plan that will turn North Monterey County and the Monterey Peninsula into another San Jose. The Save Our Peninsula Committee urges you to put this Plan to a vote of the citizens living within the jurisdiction of the elected members of the Fort Ord Reuse Authority. | 5

Sincerely,



ED LEEPER
Chairman

"We can't do anything in the creation of economic development that would spoil what we have."
Dan Albert, Mayor of Monterey, Monterey County Herald, October 17, 1994.

Bob Evans, Treasurer

PO Box 223295
Carmel 93922

LAURENCE DICKEY REMARKS AT FORT ORD REUSE AUTHORITY BOARD MEETING AT SEASIDE , MONDAY , JULY 1, 1996, ON SUBJECT OF DRAFT EIR FOR DRAFT FORA REUSE PLAN.

I AM LAURENCE DICKEY, A MONTEREY PENINSULA RESIDENT AND LONG TIME OBSERVER OF WHAT HAS AND HAS NOT BEEN DONE TO CONVERT 28000 ACRES OF MOSTLY EMPTY LAND AND OLD BUILDINGS AT FORT ORD TO ENHANCE AND BENEFIT MONTEREY COUNTY.

NOW AFTER TWO YEARS OF DELIBERATIONS , FORA IS CONSIDERING THE LATEST DRAFT PRESENTATION BY ITS PROFESSIONAL PLANNERS ALONG WITH AN ENVIRONMENTAL IMPACT REPORT. THE PLAN PROPOSES TO CONSTRUCT ~~ON A~~ A WHOLE NEW COMPLEX OF HOMES, BUSINESSES , INDUSTRIES, SCHOOLS, HOTELS FOR OVER 70000 PEOPLE, NEEDING NEW INFRASTRUCTURE, NEW COMMUNITY SERVICES , NEW SCHOOLS, NEW WATER AND NEW MONEY

YOUR PROPONENT, CONGRESSMAN SAM FARR, HAS STATED "THE FORT ORD CONVERSION WILL CHANGE THE FACE OF THIS PENINSULA FOR GENERATIONS TO COME" AND CONCERNED CITIZENS WHO HAVE READ OR BEEN BRIEFED ON THE PROPOSAL ARE QUESTIONING : WHAT IS THE NEED FOR SUCH A OVERWHELMING PROJECT, DOUBLING WHAT WAS THERE WHEN FORT ORD WAS A DISCIPLINED, INSULAR ARMY BASE ?

THE EXISTING COMMUNITIES HAVE WORKED HARD AND WISELY TO OVERCOME THE EFFECTS OF THE MILITARY BASE CLOSURE AND DEPARTURE OF A 15000 MAN ARMY DIVISION. THEY HAVE BEEN SUCCESSFUL AND CONTINUE TO PROGRESS NATURALLY AND REASONABLY, WHILE MAINTAINING THEIR UNIQUE QUALITY OF LIFE

WHY RUSH TO IMPOSE A DETAILED MASTER PLAN ON THE COUNTY AND CITIES 2
WHEN EACH IS DESTINED TO DEVELOP, FOR BETTER OR WORSE, ACCORDING TO THE UNDENIABLE LAWS OF SUPPLY AND DEMAND. OR IS THIS "SOMETHING FOR EVERYBODY" PLAN A POLITICALLY DIRECTED APPROACH, LEAVING IT UP TO THE PUBLIC TO CUT BACK ON THE OBVIOUS ECONOMIC AND ENVIRONMENTAL EXCESSES?

THE ANSWERS TO THE QUESTIONS ; WHERE IS THE WATER AND WHERE IS THE MONEY ARE REASONS ENOUGH TO CUT BACK THIS LATEST PROPOSAL. THE PRESENT ALLOCATION OF 6600 ACRE FEET OF WATER IS BEING DRAWN FROM THE SEASIDE BASIN ACQUIFER WHICH IS ALREADY CRITICALLY LOW AND THERE IS NO ASSURANCE THAT ADDITIONAL SUPPLIES WILL BE MANUFACTURED , RECOVERED, REPROCESSED OR TRANSPORTED WITHIN TEN YEARS. THERE IS NO MONEY ON HAND OR BUDGETED FOR THE REQUIRED IMPROVEMENTS TO PROJECT SITES BEFORE ENTREPRENEURS WILL BUY THEM AND PAY USER FEES 3

I RESPECTFULLY SUGGEST THE ENVIRONMENTAL IMPACT REPORT AND REUSE PLAN WHICH HAS TAKEN SO MUCH TIME, EFFORT AND MONEY AND GIVEN US SO, LITTLE IN RETURN BE RETAINED AS A REFERENCE POINT FOR SCALING DOWN THE PROPOSED MAXIMUM BUILD OUT . THE USEFULNESS OF THESE DOCUMENTS SHOWS US THAT HUGE MITIGATIONS ARE NEEDED FOR A PROJECT THIS SIZE. WE NEED A MINIMUM PLAN IN KEEPING WITH THIS OUT-OF -THE-WAY PENINSULA WHICH WE RECOGNIZE AS A VERY FRAGILE AGRICULTURAL AND RECREATIONAL AREA. EVEN SO, MONTHS FROM NOW WE MAY TURN DOWN THE ALTERNATIVE PLAN FOR ITS DAMAGING ENVIRONMENTAL IMPACTS 4



Fort Ord Reuse Authority

DRAFT FORT ORD REUSE PLAN/EIR COMMENTS FORM

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Comments should be directed to:

Fort Ord Reuse Authority
100 12th Street Building 2880
Marina, CA 93933
Phone: (408) 883-3672 Fax: (408) 883-3675

PLEASE PRINT THE FOLLOWING INFORMATION:

Name: Sal Horcuita
Address: 1675 Mescal Ct
City: Seaside Zip: 93955 Phone: 394-9351

COMMENTS: (please also use the back of this sheet or attach additional sheets if needed).

I believe that the EIR is ~~not~~ complete without any mention of CLEAN UP of toxic materials, ordnance, etc. of the Fort Ord environment. Clean up of the Fort Ord environment is very significant not only to Fort Ord residents but also to the residents in surrounding communities & visitors of the area.

I believe that the EIR should address this issue & reassure us of the safe use in the area. Thank you.

FORT ORD TOXICS PROJECT

PO Box 3115 - Carmel - CA - 93921 Voice 408 375-9464 - Fax 408 375-0724

July 1, 1996

Fort Ord Reuse Authority
100 12th Street, Building 2880
Marina, CA 93933
Attn: Ann Hebenstreit Ref: May 1996 Draft Environmental Impact Report

Greetings:

Thank you for the opportunity of commenting on this DEIR. We are concerned with a number of issues which are discussed below and to all of which we respectfully request substantive responses in the FEIR. Please avoid dismissive and/or perfunctory replies such as "comment noted."

REQUEST FOR EXTENTION OF PUPLIC REVIEW PERIOD

This letter is intended to request an extension of the public review period for the above-referenced DEIR until at least September 16, 1996. The CEQA statute (Public Resources Code) Section 21091(a) states that the public review period for a DEIR "shall not be less than 30 days." (emphasis added). The CEQA Guidelines Sections 15087 and 15105 state that the public review period for a DEIR shall be not less than 30 nor more than 90 days "except in unusual circumstances."

We believe that FORA's DEIR presents an "unusual circumstance" justifying the extension of the public review period for a cumulative total of more than 90 days. Fort Ord is one of the largest military base closures in the United States. In addition, neither the U.S. EPA nor the Department of Defense has finally promulgated a munitions rule to comply with the Federal Facilities Compliance Act.

The DEIR is also unusual in that the DEIR "tiers off" of the Environmental Impact Statement (EIS) prepared by the Army to comply with the National Environmental Policy Act (NEPA). Thus, in addition to the DEIR (and three accompanying volumes) the public is required to review the EIS and the extensive environmental documentation cited therein. Furthermore, the DEIR is unusual in that it also "tiers off" of a Supplemental EIS prepared by the Army that has not yet been approved as Final (no Record of Decision on the SEIS has been published). Until the SEIS is published as final, the public cannot be expected to meaningfully comment on the adequacy of that document to serve as the "building block" of the DEIR.

REQUEST FOR PUBLIC WORKSHOPS

We are aware that the Ventana Chapter of the Sierra Club has requested public workshops on the DEIR. We join in the Sierra Club's request.

In addition, we refer FORA to CEQA Section 21101, which requires the State to prepare an EIR when it "officially comments" on a federal project with potentially significant effects on the environment. The State is required to officially comment on the Army's proposed cleanup plans for Fort Ord by the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). To the best of our knowledge, the State has not yet prepared such an EIR on the Army's proposed cleanup plans. We recommend that FORA consider holding joint public hearings/workshops with the State Department of Toxic Substances Control (DTSC), which is one state agency that officially comments on the Army's cleanup plans. Cleanup and reuse are closely intertwined processes. By holding joint public workshops with the DTSC, FORA would do great service to the public by allowing concerns and questions regarding cleanup and reuse to be addressed in one forum. The public will be better informed as a result.

2

Sincerely,



Curt Gandy
Executive Director
Fort Ord Toxics Project

Michael Houlihan
UC, Santa Cruz

FORA Reuse Plan EIR PUBLIC HEARING REMARKS

Chair Barlich, Vice Chairs, member Martin, members of the Board. Thank you for this opportunity to comment on the Environmental Impact Report that evaluates the potential impact of the proposed development included in the draft FORA Reuse Plan.

The University of California appreciates the hard work by FORA staff and consultants that have taken us this far, and we recognize the publishing and adoption of these planning documents as an important step in the reuse process, and look forward to presenting more formal comments in writing.

I want to take this time to point out that the Regents of the University of California at its June meeting incorporated the 605 acres into the UC Natural Reserve System. *in its ecological richness* This acreage is both significant and costly to manage, ~~and~~ *representing UC investment* This should be accurately reflected in the planning documents, but is not consistently shown in the graphics in Volumes 1 & 2 of the Reuse Plan, *or the EIR*

There are a few additional comments we would like to highlight this evening as follows:

First, there are some conflicts between the numbers used from one document to another. *jurisdiction* A close reading will note these minor discrepancies that must be corrected in order to be assured of the accuracy of the Environmental Impact Report. *jurisdiction*

Second, it is also of importance to note that there are a series of mitigations proposed to address important infrastructure service areas, especially transportation. We would encourage the communities impacted by the closure of Fort Ord to continue to work together, with UC and CSUMB to make certain that these improvements can be successfully and financially implemented.

Finally, in several cases the use designation on selected planning areas does not describe the assumed uses to date. In particular, there is no description of permitted use, that we can identify, that would allow Research and Development on the UC parcel between Imjin and Inter-Garrison Roads. *Education and Research are our business and should be allowed*

I would like to close with pointing out that the Santa Cruz campus, as the lead for the MBEST project for UC, is a partner in a crucial effort to strengthen the region as an emerging center for science and research. Again, we will submit our formal and detailed comments before the close of the comment period. Thank you.

FORA:

July 1, 1996

At their 6/14/96 meeting FORA approved Caltrans request for the Route 68 alternative alignment traversing Fort Ord. This is a 1000' wide right-of-way (R.O.W.) to accommodate a future 4 lane freeway between Salinas and Del Rey Oaks.

The subject of this R.O.W. request and the alignment of the R.O.W. itself was considered solely by the city and county agencies involved. The public, for the most part, is completely unaware of such a R.O.W. The agencies, however, including Caltrans, now claim that the public could have attended any of their meetings and been heard if they had wanted to. This may well be true but the fact is that these agency meetings were never properly publicized as public hearings or in a manner that might give the public any idea of the import of what was going on.

Indeed, the last time the public was alerted about anything concerning this R.O.W. was at a meeting held in November 1992 at the Cypress Community Church on Hwy 68. This was an elaborate presentation put on by Caltrans in which two proposed alignments for this R.O.W. were shown to us. One alignment was along existing Hwy 68 and the other was shown traversing Fort Ord to the north and called the South Fort Ord Alternate. We were asked for and gave comments concerning the two proposed R.O.W.'s. We were told that our comments would be studied and that Caltrans would "get back to us with answers and keep us informed as to developments". They never did!

Now, suddenly, we discover that the new requested alignment is not only completely different from either of those presented at the 1992 meeting but that this new alignment, for expeditious reasons, has already been approved by all the agencies and that it is therefore too late for any further input from the public.

This 1000' R.O.W. easement (as I understand it) will now be shown on all future maps of record for Fort Ord and adjoining properties as a "1000' right-of-way for proposed Freeway". The location of this proposed Freeway will not only profoundly affect the complexion of the metropolis in the making for Fort Ord including traffic logistics and the environment in general but property values as well for lands in the vicinity of the freeway.

To have all this "set in concrete" by these agencies, supposedly working in the public's behalf, but without public input is probably illegal and at best improper.

FORA must, and I emphatically request that, "all designations showing this 1000' Caltrans R.O.W. easement be removed from maps of the Fort Ord property."

Clark Beck

Clark Beck
23765 Spectacular Bid Lane
Monterey, CA 93940

35

On the basis of these same arguments I am also requesting that the extension of York Rd. be removed from all maps. 2



Fort Ord Reuse Authority

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Comments should be directed to:

Fort Ord Reuse Authority
100 12th Street Building 2880
Marina, CA 93933
Phone: (408) 883-3672 Fax: (408) 883-3675

PLEASE PRINT THE FOLLOWING INFORMATION:

Name: YOKO WHITAKER
Address: P.O. BOX 724
City: CARMEL Zip: 93921 Phone: (408) 626-4559

COMMENTS: (please also use the back of this sheet or attach additional sheets if needed).

- THE ENVIRONMENTAL REVIEW PROCESS IS INTENDED TO EDUCATE & INVOLVE THE PUBLIC IN DECISIONS REGARDING GROWTH & DEVELOPMENT IN OUR COMMUNITIES. THE PROPOSED REUSE PLAN IS OF SUCH MASSIVE PROPORTIONS, WILL INVOLVE MULTI-MILLIONS OF DOLLARS IN EXPENSE & FUNDAMENTALLY CHANGE LIFE ON THIS PENINSULA AS WE KNOW IT. NUMEROUS COMMUNITY STUDY SESSIONS & PUBLIC HEARINGS MUST BE HELD OVER THE NEXT TWO MONTHS TO READ ALL OF THE MATERIAL & UNDERSTAND ALL OF THE RAMIFICATIONS OF THE DECISIONS BEFORE US.
- F.O.R.A. WOULD SEEM TO BE WORKING CONTRARY TO THE SPIRIT OF C.E.D.A. IF IT DID NOT MAKE THE EFFORT TO ALSO HAVE A DETAILED "EXECUTIVE SUMMARY" OF THE DRAFT E.I.R. AVAILABLE TO THE PUBLIC. THE COST OF PURCHASING THE DRAFT E.I.R. SHOULD BE REASONABLE SO AS TO ALLOW FOR THE BROADEST PUBLIC ACCESS POSSIBLE. THERE SHOULD BE MORE COPIES AVAILABLE AT PUBLIC LIBRARIES & CITY HALLS, FOR EXAMPLE.

(OVER)
36-1

- THE DRAFT E.I.R. TAKES A "PROGRAMMED" APPROACH WHICH IS THEREBY MORE GENERAL & LESS PRECISE THAN A "STAGED" APPROACH. AS A RESULT IT IS SHORT ON DETAILS & DOESN'T PROVIDE THE NECESSARY DATA FOR THE DECISION MAKERS OR THE PUBLIC TO MAKE SOUND DECISIONS & TO KNOW AT THE OUTSET WHAT THE TRUE ECONOMIC, RESOURCE & ENVIRONMENTAL CUMULATIVE IMPACTS WILL BE. SINCE THIS APPROACH OF A "PROGRAMMED" E.I.R. HAS BEEN DECIDED ON BY F.O.R.A. & ITS' STAFF, IT IS NECESSARY FOR THE PUBLIC TO REQUIRE AS MANY ANSWERS TO QUESTIONS AS POSSIBLE NOW, LEST WE NOT GET ANOTHER CHANCE TO LET OUR CONCERNS BE VOICED.

- THE DRAFT E.I.R. IS VERY GENERAL & LACKS ADEQUATE DETAILS & SPECIFICS ON TRANSPORTATION IMPACTS & IMPACTS OF MITIGATION MEASURES; IT LACKS SUPPLEMENTAL WATER SOLUTIONS; IT LACKS ALL OF THE DIFFERENT POSSIBILITIES OF FINANCING FOR INFRASTRUCTURE DEVELOPMENT, WATER DEVELOPMENT, SCHOOLS & ENVIRONMENTAL CLEANUP. WHERE IS AN ANALYSIS OF WHAT WILL HAPPEN IF MONIES CAN'T BE RAISED? WHERE IS THE DISCUSSION OF HOW THE CURRENT RESIDENT TAXPAYERS ARE GOING TO BE AFFECTED BY THE STAGGERING COSTS OF DEVELOPMENT?



Fort Ord Reuse Authority

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100 12th Street Building 2880
Marina, CA 93933
Phone: (408) 883-3672 Fax: (408) 883-3675

PLEASE PRINT THE FOLLOWING INFORMATION:

Name: DR. JIM HUGHES
Address: 856 MARINA PINES RD.
City: PACIFIC GROVE Zip: 93950 Phone: (408) 372-6660 (WORK)
372-0176 (HOME)

COMMENTS: (please also use the back of this sheet or attach additional sheets if needed).

Re: Recreational Element & Open Space Element

Concern about water safety on beaches behind the dunes. Problems:

- Steep unconsolidated dunes
- High wave action
- Almost non-existent beaches at high tides and even less with certain wind conditions

Need for controlled beach access if many accidents are to be prevented.

37

30 years involvement with local ocean rescue unit



Need executive Summary, Thx

Fort Ord Reuse Authority

sent 7-2

DRAFT FORT ORD REUSE PLAN/EIR COMMENTS FORM

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Fort Ord Reuse Authority
100 12th Street Building 2880
Marina, CA 93933
Phone: (408) 883-3672 Fax: (408) 883-3675

PLEASE PRINT THE FOLLOWING INFORMATION:

Name: Terry Oleser Resided in MARINA 1994-95
NOW IN CANDEL
Address: PO Box 536
City: MARINA Zip: CA Phone: 645-4827 (daytime)

COMMENTS: (please also use the back of this sheet or attach additional sheets if needed)

Deltapoint Inc

Please extend period of public comment for at least two more months (till Sept 30)
Please use media to full advantage + ask key leaders of civic associations, churches etc to talk up the public hearings
(This does not have to be expensive if you use posters, the Internet, + PSA's)
Other comments will follow under separate cover

July 1, 1996

Fort Ord Reuse Authority
100 12th Street, Building 2880
Marina, CA 93933

Attn: Ann Hebenstreit Ref: May 1996 Draft Environmental Impact Report

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Sincerely,

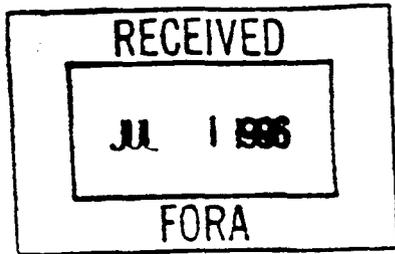
Richard E. Bailey

Richard Bailey

440 Ramona Ave. Apt. 16

Monterey, CA 93940

PS: I am a member of the Fort Ord RAB
Water, Soil and UXO Committees.
I am the Chair of the water and
Co-chair of the unexploded ordnance
and toxic waste committees.



HOOPER
7 PASEO SEGUNDO
SALINAS, CALIFORNIA
93908

JUNE 24, 1996

FORT ORD REUSE AUTHORITY
"FORT ORD"
100 12TH STREET
BUILDING 2800
MARINA, CALIFORNIA
93933

Dear Sir or Madam,

Several years ago, there was a proposal to build a Highway 68 bypass on part of the Fort Ord property. One of the reasons the proposal was rejected was objection by the Army to giving up any of Fort Ord for the project. The loss of the land would have had an adverse impact on the area available for military training.

Now that "Fort Ord" is gone, the Army is in no position to object. Traffic levels along Highway 68 show that the need for another route between Salinas and the Monterey Peninsula still exists. I have not, however, heard

any more about the possibility of using part of the former Fort Ord property for a Highway 68 bypass or similar route between Salinas and Monterey,

this is a project that is needed and should be considered. Engineering studies would show the best route but it does appear that part of the land designated as "open area" could be used for this purpose without a substantial adverse impact on open space uses. This proposal should be considered even if funds are not now available for the project, the land could be identified and set aside for the purpose.

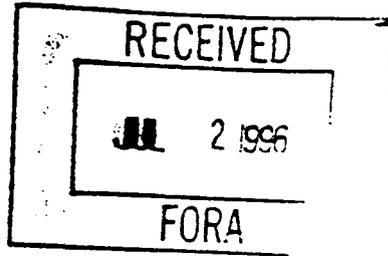
I am available to do some work on the plan after July 17.

I am looking forward to your response.

Sincerely,

Stephen E. Hooper

40-2 STEPHEN E. HOOPER



30 June 1996

Dear Members of FORA,

I am writing to express some concerns about FORA's Ft. Ord Reuse Plan. Having talked with Les White by phone, I am of the understanding that at present there are no plans for public campgrounds on the Ft. Ord property, except for a campground in the coastal zone of 150-300 units, a group campground, and a campground for youth groups.

There are not currently adequate campground facilities on the Monterey Peninsula (or in the county at large) for the numbers of people coming to this area. There is an abundance of land on Fort Ord property which could be converted to campgrounds with minimal planning. I urge FORA to include more campgrounds for the public in the revised reuse plan. There could even be some leasing of land for campgrounds which would be of temporary (4-5 year) duration.

With thousands of acres not scheduled for development for some years down the road, the feasibility of developing some very basic campground facilities is one which shouldn't be overlooked.

Some may think that campgrounds don't give enough "return" on the investment, but the value of campgrounds lies in the public service that they provide. Many of those ^{on the Peninsula} who now run the big hotels charging steep overnight room rates had parents who were able to take advantage of cheap land and low costs for property back in the early years of the century (fifty years ago or more). Land was put aside back then for parks and recreational areas--and it proved to be beneficial in the long run. So, too, is the putting aside of some Fort Ord land for campgrounds for visitors and residents to make use of.

The development of campgrounds should be a priority--and be initiated soon. Ken Gray of the State Parks Dept. says that the coastal campgrounds at Ft. Ord are a minimum of three years away. Campgrounds further inland on Ft. Ord property could--and should--be opened much sooner--they could probably be ready in six months.

Please give some serious consideration to this request. My other concern is that there be a viable land treatment method devised for treatment of water (possibly sewage).

6-23-96

Dear Fort Ord Reuse Authority

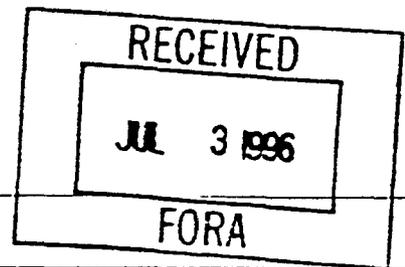
I am writing to oppose the Fort Ord reused plan. My husband and I purchased our home on Marietta in Seaside with the peace of mind that the beautiful open expanse of Fort Ord would remain as it is. Instead we are faced with possible construction of homes, hotels, golf courses, business parks and shopping malls. I am very saddened by this still over ambitious plan. When will enough be enough? Who will benefit? I can tell you that I won't. It must be safe for me to assume that water in our area is no longer an issue and I am free of water conservation.

I urge you to leave Fort Ord as it is. Those of us who use the trails for hiking can tell you it's beauty is unending and must not be disturbed. Leave what little is left as it is.

Thank you for your consideration

Olava & Rodney Bartok
1618 Marietta
Seaside

JULY 2, 1996



TO:

JACK BARLICH, CHAIRMAN OF FORA

THIS LETTER IS IN REGARD TO THE "FINAL BASE REUSE PLAN". FORA SHOULD LIMIT THE PLAN TO REPLACE WHAT WAS LOST WITH THE CLOSING OF FORT ORD, I.E. ECONOMIC IMPACT AND SOME OF THE POPULATION.

THE MONTEREY COUNTY HERALD STATES IN THE MONDAY, JULY 1, 1996 FINAL EDITION THAT THE MONTEREY PENINSULA FACES A HUGE WATER SHORTFALL WITHIN SIX MONTHS. THIS IS A PROBLEM THAT, AS OF TODAY, HAS NO SOLUTION.

I AM AN OWNER OF VERY PRODUCTIVE FARM LAND IN THE BLANCO AND COPPER ROAD AREA OF THE BLANCO DISTRICT. THESE WATER SHORTFALLS FACED BY THE MONTEREY PENINSULA AND THE FORA "FINAL BASE REUSE PLAN" WILL NOT BE SOLVED FROM INCREASED PUMPING FROM THE SEASIDE AQUIFER OR THE SALINAS VALLEY AQUIFER. I WILL GO TO COURT TO PROTECT MY WATER RIGHTS AND MY PROPERTY RIGHTS.

THANK YOU FOR YOUR ATTENTION.

Note: Whole submission is 1 comment

TOP



RECEIVED
JUL 3 1996
FORA

THEODORE ROOSEVELT
UNWAR VETERANS - THE WARRIORS

1962

"A MAN WHO IS GOOD ENOUGH TO SHED HIS
BLOOD FOR HIS COUNTRY IS GOOD ENOUGH
TO BE GIVEN A SQUARE DEAL AFTERWARD.
MORE THAN THAT NO MAN IS ENTITLED
TO, AND LESS THAN THAT ~~NO~~ MAN SHALL HAVE."

Bill Batez
Watercolor Artist
19 Santa Monica Court
Sausalito, CA 94901 USA

WARRIORS
REST
AT FOOT OF

ORDE
ALREADY
DO THIS FOR THEM



"ITS THE LEAST WE CAN DO FOR THEM"

Bill Baltezar

JULY 4, 1996

USA

FROY

Bill Baltezar
Watercolor Artist
19 Santa Monica Court
Salinas, CA 93901 USA

Ph n 408-422-2376

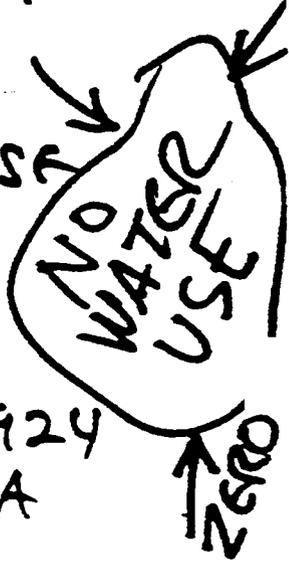
SIRS: I WAS AT MAY 18, 1996
45 SQUARE MILES - or 28,000 ACRES OF LAND
THAT WAS FORT ORD. 17,300 ACRES UNDEVELOPED
ALL I ASK IS THE COMMITTEE CONSIDER
MY PLEA. ARTICLES IN NEWSPAPERS, TV AND RADIO
TELL IT TAKES IS A SIMPLE "YES" FROM THE
BOARD.

I PRESENTED MY SUGGESTION AT MEETING IN MONTEREY
CALIFORNIA. I ASKED FOR IT TO BE PUT IN THE MINUTES
SO IT WOULD NOT BE LOST.

I WANT JUST (13) ACRES OF THIS PREVIOUS
AND FOR A MILITARY RESTING PLACE A MILITARY
CEMETERY. WARRIORS REST, FOR MONTEREY COUNTY
SERVICE MEN - WOMEN WHO SERVED OVERSEA - IN
WAR TIME (NOT PEACE TIME). NO DEPENDENTS
ONLY WAR VETERANS. EITHER BURIAL BY COFFIN
OR CREMATION.

IS THIS ASKING TOO MUCH.
ITS THE LEAST WE CAN DO, FOR THOSE
WHO GAVE THEIR ALL".

Thank You - William J. Baltezar
BORN MAY 8, 1924 - 1924
Butte, Montana. USA



P.S. I'M SPEAKING FOR MONTEREY COUNTY.

AN. 22. 1996 FORT ORD REUSE PLAN - E114
ON DAY - Jan. 22. 1996 - Monterey Conference Center -
CHAIRMAN - LADIES! Monterey, CA. STG-IN-BEIS FORUM

BILL BALTEZAR - SALINAS - Vet. WORLD WAR II - KOREA
WARRIOR REST CEMETERY

I'm speaking for the TENS OF THOUSANDS
OF WAR WARRIORS. - THE MEN WHO WERE
BATTLED HERE AT FORT ORD. LET US FORGET

ALL I HEAR IS - I WANT WE WANT.
THEY WANT - "A PIECE OF THE PIE"

I'M HERE - TO PLEAD THE CASE - TO SPEAK
FOR ALL THE SERVING MEN who died
SO WE COULD LIVE LIKE FAT
KINGS - IN THIS LAND OF MILK AND HONEY

WE HEAR THIS: (IF YOU WERE IN THE SERVICE
YOU RECALL THOSE WORDS)

WE HEAR THIS: (LOOKING A PANEL - WERE ANY OF
YOU BORN WHEN JAP BOMBED PEARL HARBOR)

EVERYONE IS LOOKING OUT FOR THEIR
IN SELF INTEREST. I'M SPEAKING FOR
VETERANS - THE DEAD - THOSE WHO ARE ABOUT TO DIE

PLEASE GIVE US ^{SOME LAND} 13 ACRES OF LAND - JUST
ACRES OF FORT ORD FOR A CEMETERY.

THE SOUTH WEST CORNER - THE HILL TOP
LOOKING MONTEREY BAY. A BURIAL PLACE
THE MONTEREY COUNTY WARRIORS -
RESTING PLACE AND EVER 44-3 D. 10 11

408-482-2376
USA

7-26-

Please read PUBLISHED LETTERS ENCLOSED

PLEASE HAVE THIS INFORMATION RECORDED
IN YOUR "MINUTES" FOR REFERENCE.

THIS IDEA - NO WATER USE.

THE AREA WOULD BE WHITE OR GOLD OR
BROWN CRUSHED STONE. NO GRASS.

NO WATER USE.

TO BE BURIED HERE IN.

WARRIORS - VETERANS OF ACTUAL WAR

COMBAT ONLY - NO SPOUSE - NO

RELATIVES - NO RESERVE, POLICE

ACTION - ONLY COMBAT WAR

VETERANS. THE RECORD SHOW ACTUAL

MONTHS IN "HARMS WAY"

44-4
William J. Patton

Bill Balazar
Waterlox Arise
19 Santa Monica Court
Long CA 93901 USA

WARRIORS REST

F.O.R.A
FORT ORD
MILITARY
CEMETERY
7-2-96

MARINA, CA ↑

Ft. ORD

X
THE WARRIORS
REST - ONLY FOR
SERVICE PEOPLE WHO
SERVED IN WAR TIME.
OVER SEAS (NOT DESK
JOB IN
USA.
WAR
TIME.
NOT PEACE
TIME

COAST LINE

Bill Balazar
Watercolor Artist
19 Santa Monica Court
Salinas, CA 95001 USA

THIS TINY PIECE OF
FORT ORD - WARRIORS
REST. NO WATER
USE.
WHITE
FLAT GRAVEL
STONE.
SIDE / CALIF.

← 44-5

Jan 22, 1994

LETTERS TO THE EDITOR

There is more help for parents in need. I am writing in response to the column written by Maria Gil on Jan. 10 entitled "Parents alone won't help kids become successful adults."

The Child Abuse Prevention Council of Monterey would like to express support for Torres's comments about the need for parents to be involved with children. CAPC recognizes parenting is a challenging job. There are, however, many community resources to help parents. We would be happy to provide interested parents with information on these resources. Reached at 755-1111.

CAPC's mission is to provide information on child abuse. Our goal is to help parents raise their children in a safe and healthy environment. We have volunteer staff in our offices to assist you in your efforts to ensure a safe and healthy environment for your children. Call the K... at...

Bill Baltezar
Whittaker Ave
19 Santa Monica Court
Salinas CA 93901 USA

As a veteran — World War II and Korea — I am asking all service people to stand up and be counted. Take a tiny piece of Fort Ord facing the beautiful Monterey Bay. Make a cemetery for war veterans.

As everyone is hoggish, I'm suggesting that this military cemetery be only for veterans who served during actual war time, not occupation, not police action, only war time. This sacred piece of our land will not be for spouses — or any other relative — but only for the service man or woman; no exceptions.

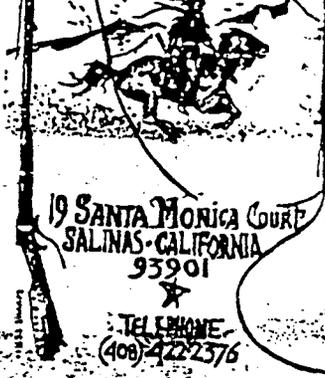
Is this asking too much? We earned it.

We don't need a mausoleum, only earth burial or cremation. No marble, pumice block eyesores — only green grass and bronze flat markers. And on top of the highest hill the Stars and Stripes.

Bill Baltezar
Salinas

BILL BALTEZAR

Historicist of THE True West



19 SANTA MONICA COURT
SALINAS-CALIFORNIA
93901

TELEPHONE
(408) 422-2376

THE CALIFORNIAN
THE COAST WEEKLY

SOMEONE WILL SAY - HE IS LOOKING FOR A HAND OUT - A FREE PLACE TO BE BURIED IN BUTTE MOUNTAIN

FORT ORD

Reuse Suggestions

Everybody wants a piece of the pie at Fort Ord. Why didn't someone ask me? This Fort Ord mess is a mess. The list grows longer by the day — conference center, high-rise hotel, Presidio, equestrian trail, bike trail, ag center, airfield, old folks home, etc., etc. **LOW COST GIVE AWAY**

Not one word about a military cemetery. I'm speaking for the millions who served and died so we all can live in this land of milk and honey.

I ask the planning committee, to take just a tiny piece of the fort, a hillside facing the blue Monterey Bay, a quiet place, a cemetery for war vets.

This hallowed piece of land should be only for veterans who served in actual wartime not occupation, not police action, but wartime. This sacred piece of our land, not for spouses, relatives, only for men or women who served in war. **No exceptions.**

Is this asking too much? We earned it. No need for a mausoleum, no pumice-block eyesores, only flat markers, same design — only green grass. And on top of the highest hill the Stars and Stripes.

Bill Baltezar
Salinas

WE COULD CALL IT

NOT ME - I'D BE BURIED IN MOUNTAIN

WARRIORS REST

FOR MONTEREY COUNTY VETS

War vets deserve to rest at Fort Ord

On Jan. 24, the straw broke the camel's back.

All of the talk about Fort Ord concerned a conference center, resort hotels, Presidio (I agree), equestrian trail, ag center, bus-transit center, airfield (I agree) and a university.

There was not one word about a graveyard for veterans. I'm speaking for the millions of men and women who served and died so we all can live in this land of milk and honey.

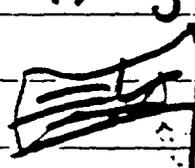
Feb. 1, 1994

44-6

AN IDEA FOR
THE FORT ORD
WARRIORS REST
COMBAT CEMETERY

I'M
SERIOUS
ABOUT THIS
PROJECT

F. OR



MONKEY BAT

BORN

Bill Balazar
2-96-

OVERLOOKING
MONKEY
BAT

AND ON TOP OF THE
HILL-OVER LOOKING THE
GRAVES OF HIS FELLOW
COMBAT WARRIORS - ONE
LONG INFANTRYMAN

CAST IN BRONZE

of World War II
sculpted in 1980

2-7-96

Bill Balazar 44-7

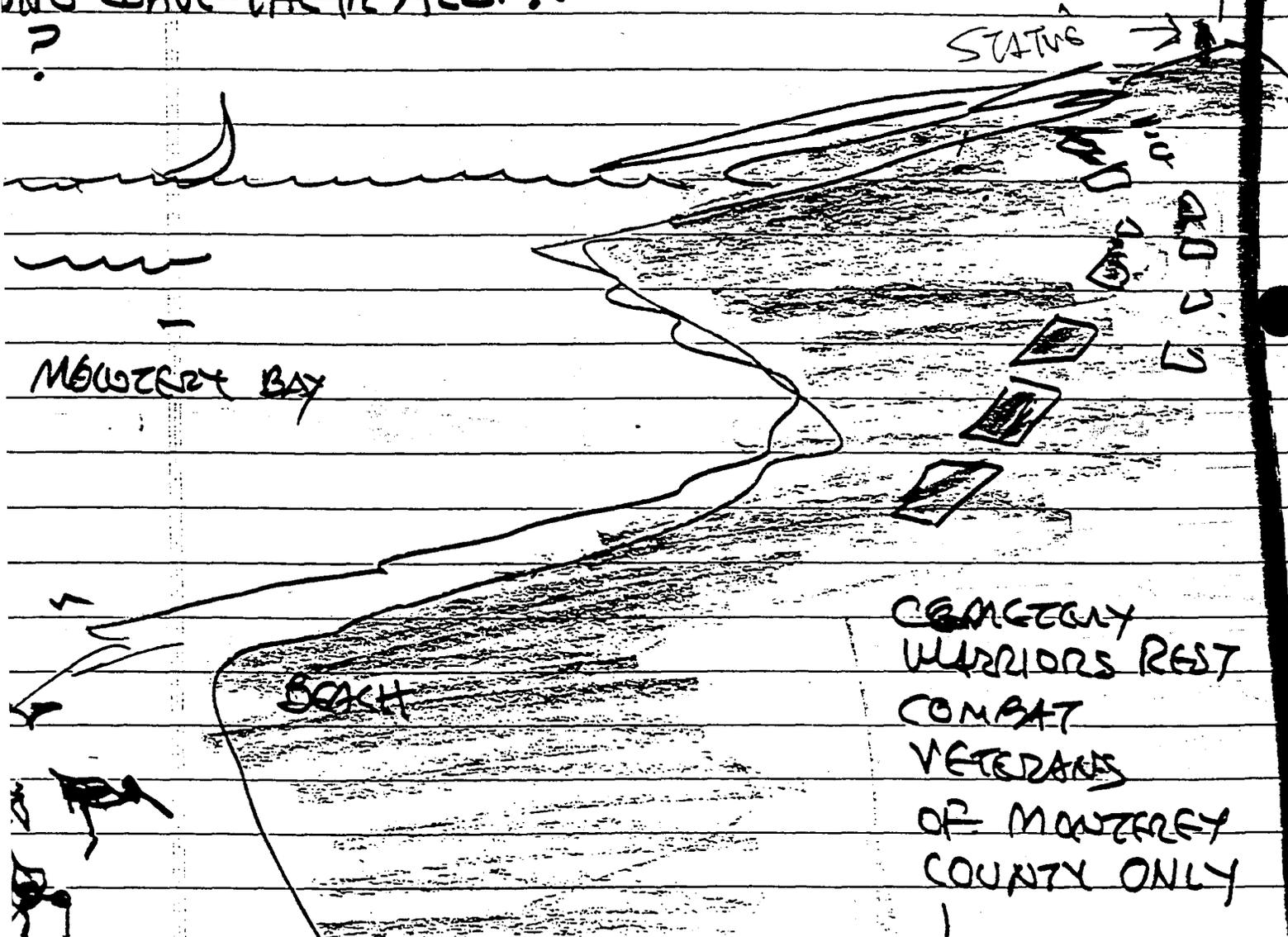
Bill Balazar
Watercolor Artist
10 Santa Monica Court

MAILED TO
(FORA)

SO FORT
ORD WILL
? BE REMEMBERED

IS THIS
ASKING TOO
MUCH FOR THOSE
WHO GAVE THEIR ALL.?

X
A UNITED STATES
FLAG - MAST ON HILL TOP
A STATUE OF A COMBAT
VETERAN MAN - LOOKING
OUT TO SEA - CAST
BRONZE



COMBATELY
WARRIORS REST
COMBAT
VETERANS
OF MONTEREY
COUNTY ONLY

WHO ACTUAL
WERE IN
"HARMS WAY"
in WAR.

Bill Bahezar
Watercolor Artist
19 Santa Monica Court
Salinas, CA 93901 USA

NO GRASS -
THUS NO WATER USE 408-472-2376
44-8

1

FROM: 7-2-96

Bill Balazar
Watercolor Arts
19 Santa Monica Court
Santa Monica, CA 90401 USA

WCBal

I WILL BE
IN NORWAY
JULY 3 to
JULY 25.

1996 WCBal

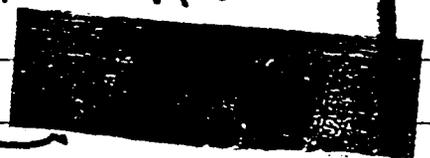
MAILED COPIES OF
ALL REUSE INFO
FEB. 7, 1996
JULY 2, 1996

To — Fort Ord REUSE AUTHORITY
(FORA)
100 - 12th St.
Bldg. 2880
MARINA,
CA. 93933
Ph 408-883-3672

Balazar 408-422-2376

Please send me reply — That this
INFORMATION IS RECEIVED — IN
YOUR HANDS

HANDS WCBal



28 000 ACRES = ALL WE ASK FOR 13 ACRES
JAN. 22, 1996

FORT ORD REUSE AUTHORITY (FORA)
 FORT ORD REUSE PLAN/EIR SCOPING SESSION/PUBLIC HEARING

Monday, January 22, 1996
 Monterey Conference Center
 3:30 - 5:30 p.m. Agency Comments
 7:00 - 9:00 p.m. Public Comments

Monday, February 12, 1996
 FORA Conference Room
 7:00 - 9:00 p.m.
 Agencies and Public

AGENDA

I Was Here

3:30 - 5:30 p.m. RESPONSIBLE AND TRUSTEE AGENCY COMMENTS
 (see agenda below: Public Hearing/Comments)

7:20 - 9:00 p.m. PUBLIC HEARING/COMMENTS

JAN. 22, 1996

1. WELCOME AND INTRODUCTIONS

Ann Hebenstreit
 FORA Planner

2. PURPOSE OF PUBLIC HEARING
 A. FORA role
 B. Purpose of Session

Ann Hebenstreit

3. EIR PROCESS AND SCHEDULE

Michael Groves
 EDAA/EMC Team

4. EIS/SEIS PURPOSE AND SCHEDULE

David Taylor
 US Dept. of Army

5. NOTICE OF PREPARATION DESCRIPTION

Michael Groves

6. EIR PROJECT DESCRIPTION
 A. Overview of Fort Ord Reuse Plan
 B. Contents of Reuse Plan (Year 2015)
 C. Overview of Ultimate Buildout (Map/Chart)

Allan Gatzke
 EDAA/EMC Team

7. CLARIFICATION QUESTIONS ON PRESENTATION

8. PUBLIC COMMENTS
 (Please also submit comments in writing... forms available)

9. DISTRIBUTION OF INFORMATIONAL HANDOUT

10. MEETING CLOSURE

Ann Hebenstreit

COMMENT

- 1 - SAVE H2O ✓
 - 2 - REMETARY ✓
 - 3 - WATER USE ✓
 - 4 - WATER MSC ✓
- 44-10

2/12
 MEETING

Feb. 12 - 7 to 9

COMMENTS
ON MILITARY
CEMETERY
ON A HILL TOP.

NO WATER
USE.

AT THE FORUM ~

98% of COMMENTS -
"THERE AINT NO WATER.

BUT

THEY TALK ABOUT

GOLF COURSE - WATER

HOTEL - FOOD - WATER

LOW COST HOUSING - WATER

ONLY ITEM PRESENTED
WAS A MILITARY CEMETERY
- WARRIOR REST - NO WATER

NEEDED -

HEAD STONES AND CRUSHED ROCK

NO GRASS - SO 13 ACRES FOR A

CEMETERY.

DOLLARS WILL
NOT BUY WATER

TRY TO BUILD A
PIPELINE FROM
MONZANA - I DO HO

THE WATERSHED
THE CITIZENS DONT
WANT OUR MONEY

SO PLANNER -

DOLLARS WILL
NOT BY H₂O
WATER TO
DRINK

TAKE A LONG
SECOND LOOK
AT THE MASS
BUILDING ON
THE SITE

I hope?

ASK NOT WHAT YOUR
COUNTRY CAN DO
FOR YOU -
BUT WHAT YOU
CAN DO FOR
YOUR COUNTRY

408-422-2376

FORT ORD REUSE AUTHORITY (FORA)
FORT ORD REUSE PLAN/EIR COMMENTS FORM

Consultants have been retained by FORA to prepare a Fort Ord Reuse Plan/EIR. If you have comments on items that you would like to have considered during preparation of the Reuse Plan/EIR, please submit your comments in writing. This will help to assure that your comments are accurately recorded for use by the Reuse Plan/EIR consultants. Please include your name, address, and phone number below. You can use this form to submit your comments, or you can mail or fax your written comments directly to FORA. Your comments must be received no later than 9:00 p.m. on Monday, February 12, 1996. Comments should be directed to:

Feb. 12 →
1996

Fort Ord Reuse Authority (FORA)
100 12th Street Building 2880
Marina, CA 93933
Phone: (408) 883-3672 Fax: (408) 883-3675

PLEASE PRINT THE FOLLOWING INFORMATION:

Your name: WILLIAM L. BALTEZAR
Your address: 19 SANTA MONICA COURT
City: SALINAS, CA Zip: 93901 Phone: 408-422-2376

Please check here if you would like to be on the mailing list for FORA newsletters/updates.

YOUR COMMENTS ON INFORMATION TO BE CONSIDERED IN THE FORT ORD REUSE PLAN/EIR: (you can also use the back of this sheet or attach additional sheets if needed):

**RN ON YOUR WATER FAUCET - GREEN SLIME
ALL YOU WILL GET**

**IRS: I MADE AN ORAL REPORT AND REQUEST
THE JAN. 12, 1996 MEETING - MONTEREY
CONFERENCE CENTER - STEINBECK FORUM
MONTEREY, CALIFORNIA.**

**>POKE FOR SEVEN MINUTES.
WAS ONE OF FOUR SPEAKERS.**

**AM ENCLOSED COPIES OF LETTER PUBLISHED
THE CALIFORNIAN AND COAST WEEKLY**

Bill Baltezar
Watercolor Artist
19 Santa Monica Court
Salinas, CA 93901 USA

NAME

★ Bill BALTEZAR
432-2376

WARRIOR REST

1-22-97

WHAT IS A WARRIOR
WARRIOR - PERSON ENGAGED OR
EXPERIENCED IN WARFARE

- A SOLDIER ✓

- A FIGHTING man OR WOMEN ✓ ~~OR WOMEN~~ ✓
WHAT EVER

→ CA
→ 2A
→ E

OR WARRIORS REST OF MONTEREY COUNTY.
SOLDIERS AT REST - MONTEREY COUNTY

PUBLIC MEETING

FOR PUBLIC COMMENTS
on the FORT ORD REUSE PLAN / EIR

WHAT:

A workshop to obtain public comments on items that need to be addressed in the Environmental Impact Report (EIR) for the Fort Ord Reuse Plan.

WHEN:

Monday, January 22, 1996
7:00 - 9:00 P.M. to receive public comments
A session for responsible and trustee agencies to comment will be held from 3:30 - 5:30 P.M. The public is also welcome to attend at this time.

WHERE:

Monterey Conference Center
Steinbeck Forum

Information about the Fort Ord Reuse Plan and items to be reviewed in the EIR will be presented. The public will have an opportunity to submit written comments about what should be included in the EIR. To obtain a copy of the Notice of Preparation for the Reuse Plan / EIR contact the FORA office at (408) 883-3672.

Written comments may also be submitted no later than 9:00pm on Monday, February 12, 1996 to

FORT ORD REUSE AUTHORITY (FORA)
100 12th Street, Bldg. 2880
Marina, CA 93933
Phone: (408) 883-3672



WARRIORS
BATTLE ZONE THUS - (NO DEPENDANTS)

MY IDEA
A CEMETERY
OVERLOOKING
MONTEREY
BAY.

BILL
BALTEZAR
Watercolorist of
THE
True West

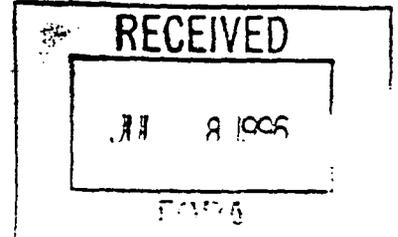


19 SANTA MONICA COURT
SALINAS - CALIFORNIA
95901

Bill Baltezar
Watercolor Artist
19 Santa Monica Court
Salinas, CA 95901 USA

Monterey, Ca.
July 3, 1996

Fort Ord Reuse Authority (FORA)
100 12th St., Bldg. 2880
Marina, CA 93933



Dear Board Members:

The FORA Board has a tremendous responsibility to formulate a workable plan for the disposition of Fort Ord property. You are stewards of this land, and you must make decisions that reflect the desires of those of us who will be impacted. There is a great deal of pressure on you by officials of adjoining cities to grab their "share" of property so they can build hotels, golf courses and housing developments, but you know the limitations of our resources, and it will take resolve to be foresighted and to make wise decisions regarding this land use. Once the area is built-out, there can be no going back!

As you know, the voters rejected the San Pablo Dam--not because of the proposed rise in taxes--but because they feared the subsequent unbridled development that would occur if there were a sufficient source of water.

If the extensive plan which you are considering for Fort Ord is approved, it will change life on the Peninsula and will seriously impact all of us negatively. We beg of you to have the wisdom and the resolve to act rationally in representing the will of the residents of the Peninsula and to choose wisely a reuse plan that will not irretrievably spoil our beautiful area.

Respectfully,

John S. and Trixie T. Brown

Comment Portion of Carmel City Council Meeting
July 11, 1996

City Council
11 July 1996
Re FORA Draft Reuse Plan/EIR

Page 16.

some idea of how to improve presentations such as this. Thank you Ann.

Hebenstreit: Um, that's good. Thank you.

White: O.K., thank you. Anything else from the Council for, for Ann. O.K., good. We'll, we'll have, we're going to start the part of the meeting that is public comment and I hope, Ann, that you'll kind of stick around for a few minutes. O.K. Keep in mind that this is the first, uh, brief explanation of the plan to the City Council, keep in mind that the agenda item does have on it the scheduling of a full meeting on this and keep in mind that, uh, we are going to limit the time, uh, then we're going to open the public hearing. One other thing I want to repeat that any comments on the EIR it would really help us if can bring them in tomorrow or Monday or Tuesday in writing, uh, because we need to get them to the staff at Fort Ord so that can respond to those comments. You're allowed three minutes, and, uh, the public hearing is open.

46

Deborah Michelson: In 1992, my name is Deborah Michelson, and I'm a resident of Carmel. In 1992, the Army stated that the future use of the Fort Ord property as ownership changes from the Army to a yet-unknown owner is an issue of significant interest to the affected community. The Army went on to say that the Army acknowledges its responsibility to insure that succeeding uses to not lessen the quality of community life or degrade the environment. The responsibility of the Fort Ord Reuse Authority is to formulate a local reuse plan as specified in Senate Bill 899. An Environmental Impact Report is needed. An EIR must be unbiased, it must be a good-faith effort at disclosing significant impacts or potential significant impacts of a finite, stable project description.

None of us, prior to the base closure announcement could have imagined that one day members of the public, eight cities, and the County and their staffs would be called upon to carefully consider a proposed project of this magnitude and with such monumental, long-term cumulative consequences. Adequate analysis of the Draft EIR must be done now, before FORA sets about on a course of actions that will gain irreversible momentum. FORA, as the lead agency, must never assume that growth in an area is necessarily beneficial or of little significance environmentally, but must make its judgment in this regard only after open-minded analysis. Careful, reasoned analysis of the Draft EIR is needed now so that FORA does not approve a project later that will overwhelm the natural environment and disasterously overburden the man-made infrastructure and vital community services.

A key issue is whether the selection and discussion of draft environmental impact project alternatives fosters informed decision-making making an informed public participation. The City of Carmel is a voting member of the Fort Ord Reuse Authority. As such, it is called upon to stretch its resources, the resources its staff, the time and efforts of its elected and appointed officials in order to

2

46-1

Page 17.

46 actively participate in the process at hand. The process and the decisions made in the next few previous weeks and months will have consequences for decades to come. The Army has acknowledged its responsibility to insure that the civilian reuse of Fort Ord does not lessen the quality of life for the Monterey Bay region and does not degrade our environment. As current residents, elected and appointed officials and staff, we can do no less. The CEQA process mandates informed decision-making and informed public participation, a series of public workshops held in various locations are needed prior to the close of the Draft Environmental Review period, the comment period. 2 cont'd

Workshops will allow decision-makers and members of the public in all areas affected by the reuse plan to ask and receive answers to questions regarding the myriad complex issues raised by the Draft EIR. And I thank you very much for listening.

White: Did you have those in writing?

Michelson: Yes, I did.

White: O.K., we'll try and have those available for Council.

Michelson: And, if, if I may, if I can emphasize something real briefly, but it is in reaction to what I heard this evening. Managed growth as a theory built into this EIR is great. There is no management for land sales, and the, the unique situation that we are in right now is only, there are significant portions of land that have moved from Army to others, but we're standing still right now. What this project is about is analyzing what happens if we go forward with this project. And what happens is some day a City of 72,000 people. Two-thirds of the 18,000 acre-feet water does not exist. Doesn't exist on site. The wastewater treatment capacity needed to build this project, and CEQA demands that you look at the whole of an action, not cut it off at year 2015, which is a lot more cheerful because you don't hit your problems yet. The wastewater treatment capacity. This project needs 11,000 acre-feet of capacity. That would take all the remaining capacity of our regional plan that all the other cities, Carmel not included, but the other cities and the City of Salinas all send their effluent there. This project uses up all the rest and no one else grows. This project also, traffic-wise, \$800,000,000, it's a round number in terms of on-site and off-site. 3

White: We've reached out three minutes, well past. Those comments, are you going to be able to put those together for us next week? The ones you just gave?

Michelson: Mayor, I am, I'm going to painfully get all the way through the documents. I've, I've begun to identify. . .

White: O.K., you have plenty of time. . .

City Council
11 July 1996
Re FORA Draft Reuse Plan/EIR

Page 18.

Michelson: . . .the Draft EIR problems and it's going to be a long list. Thank you.

White: O.K., thank you very much.

47 Harvey Kuffner: Mayor, Council Members, my name is Harvey Kuffner. I would like to reinforce what the previous, uh, speaker mentioned and have you reconsider the City Manager's recommendation not to participate in the evaluation of the EIR. It seems to me as members of FORA and as elected representatives of the City of Carmel that you have an obligation to participate in this process just as you are asking citizens to participate. If you can accept the recommendations of the citizen who doesn't have nearly the, the competence of professional staff that you have working for the City, then, if you're willing to accept the citizens then why aren't you willing to accept the recommendations of, of your staff? So please reconsider that, and I recognize may not reach a unanimous agreement on your recommendations, but that doesn't mean that you couldn't submit minority reports as well, just like the Supreme Court does. So please reconsider that and participate in analyzing the EIR as best as you can. You certainly can do a job better than most of us can. Thank you.

White: Thank you.

48 Susan McCloud: Mayor White, members of the City Council, I'm Sue McCloud. Uh, on the EIR, not having expertise has never stopped a politician from commenting before. I am not looking for more work as a Planning Commissioner, but I do think that, uh, if the other constituencies on the Peninsula are making comments that we should not rely simply on somebody, uh, bringing it up in the public, that we have a duty, a civic duty maybe, to do that, but I don't know what the practice in the other, other uh, our sister communities are. A couple of specific comments. Two presentations I've heard so far this evening, and the one on the first of July, assumes that we all have some knowledge, and speaking only for myself, I don't know that that's, uh, a valid comment. My understanding of the Fort Ord development in the initial phases was that we are trying to provide economic growth to, uh, some of the cities that are most affected by the closure of the military base. So I think it would be very helpful in future, uh, presentations, and I don't have this written down, Mr. Mayor, but I'd be happy to put it down on paper, is to provide some demographics to show just how the cities of Seaside, Marina, and Del Rey Oaks, whoever, have been affected, because we've also seen growth; we've seen the Costco shopping center which, while at Sand City, must spill over some way and bring people out to that area. And there's a new shopping center, uh, planned.

Secondly, uh, I think the question was also asked at the last meeting - where will the city demarcations fall on this actual outlay? What is going to be in Marina, what is going to be in Seaside? 2

Third question would be, how does. . .

47, 48

Page 19.

Livingston: Excuse me, what was your second question? I'm sorry, Sue.

48 McCloud: Where the demarcation of the cities would fall onto the Fort Ord property, where will Seaside end and where will Marina. Another basic, why was the Bureau of Land Management, I think one of the concerns. . . Let me back up, one of the concerns of the public is what is going to be seen from the view corridor. So, why did BLM, why is it sort of over on one side if it could have been along the Highway 1 then it could have preserved more virgin territory with the buildout in the back, such as the Fort Ord hospital, sort of hidden back in that area. Um, if CSUMB doesn't build out to the 25,000, I would agree with Ann that the figures seem to have been scaled back so far to sort of around 10 or 12,000, and I believe the City of Monterey has actually said they would not broaden Del Monte. How is that going to affect the plan? Um, these are all sort of squibbled here, so just a minute, scribbled. Uh, if we have another meeting in the City of Carmel, I would urge that we, uh, have it solely devoted to this issue and not have the citizens sit through two and a half hours until we get to a very important issue.

Lastly, the most helpful thing, um, I know Councilwoman Livingston is pushing for the Executive Summary, and I think that's very important. But what we need is a visual manifestation. And I think some sort of a map that would show extant Fort Ord property with a visual overlay of phases. I heard Ann say today that they're sort of using the same property. Well, it's, there's no map that I can see in any of the four volumes that shows that. So some sort of a visual overlay. And I think it's very important to answer some of these questions as you present each, each uh, workshop or whatever. Not make people go back to the same things again and ask the same questions. The, some of these key answers need to be factored into each presentation. Uh, and you might suggest that people submit questions ahead for the next, uh, presentation here in the City by somehow getting that word out to the public so that maybe some of the concerns could be addressed by the presenter and therefore answer the questions, be prepared to answer the questions, and I don't mean to suggest that Ann didn't answer the questions today, but there may be some others out there. I believe finishes my scribbles.

Oh, water. The two things that came up in, uh, on the first of July were the questions of water and transportation, and I think we need more specifics, not what's in this, uh, substitute summary. We need to have more specific answers on acre-feet, what's extant, what's needed, where it's going to come from and, more importantly, how its' going to affect people who already are here if they're not going to have any protection from maybe having some sort of rationing in the future. Thank you.

White: Thank you.

49 Linda Anderson: Mayor White, Council Members. Linda Anderson. I

48, 49

Page 20.

also have some scribbled comments. I thought the presentation was very articulate and, any well-prepared and she did get through a lot in a short time. I have a question, you're asking people to put things in writing, but would not the minutes of this meeting be part of the record that would be passed on?

White: What I'm referring to is that on the EIR specifically, since the lead agency is FORA, my personal feeling is, and sitting on FORA, is we ought to have, uh, those comments as they directly come from the people as, to give to FORA so they can respond to those. Having a staff person type up a transcript, sometimes you lose something, and I want to be very sure that FORA gets our comments.

Anderson: Oh, I would agree, and I will put my things in writing, but I think, you know, some people don't for whatever reason, don't want to. I mean, tonight it's sort of academic, there are only seven people in the room, but, but, it would be nice if they could hear everything that was said since the public hearing is part of the public record. Or is this, this isn't tonight, I guess. This is just a Council meeting. . .

White: Just receiving a report from. . .

Anderson: O.K., O.K. I understand that. I hope you all read the Pine Cone editorial, and I guess this isn't a public record, I think some of that should be read into the public record, but I won't bore you and read it to you if you've all read it, if you promise you'll go home and read it? O.K.

Council Member Fischer: I will read it.

Anderson: You're a good boy, Bobby.

White: Not to interrupt, but I think that will be taken to FORA tomorrow as part of the...

Anderson: Yeah, because that, that was an excellent...

White: That should go.

Anderson: O.K., you're free of hearing me read that. Um, I find it astonishing that the City of Carmel wouldn't comment on the EIR, I mean, it, that really goes to the heart of the CEQA process, that's what it's all about and as a taxpayer, I mean, I'm paying, helping pay for a professional planning staff, and it, it's an excellent staff and certainly they're well-versed in CEQA and I, I would hope you'd reconsider that, and let them. I mean, I, I would not have confidence that the general public would come up with every, every piece of information that was pertinent to Carmel as related to the EIR. I, I don't want to trust us, like here, I want you to do that. Um, I also find it interesting to only talk about going to the year 2015. I mean, as somebody said, that's simple and it's

Page 21.

49 happier. And the same thing happened at U. S. Representatives Day. Sam Farr was being asked about the FORA plan and the great buildout and his answer was, don't worry it won't happen in our lifetime. And, you know, I have children, I hope to have grandchildren, and I really don't want to leave this Peninsula ruined for them. I might not be alive, but I'd, I don't think we can think of it that way. So I think we have to look at that whole buildout. So thank you.

White: Thank you. I used to do that all the time...

50 Janice Fisher: Mayor White, I'm Janice Fisher. I would like to follow up on what the last two, uh, last three speakers have mentioned, um. I understand it was determined early on that the Planning staff would not be participating in the review of this, of the plan or the EIR because of the workload. But, uh, we certainly do have experts on the staff that review many EIRs. And, also, these staff members are members of our community too, and they would like to participate in it and it certainly could be on a volunteer basis, but I really think you have a responsibility to, um, have our staff review the Draft EIR.

White: Thank you. How are we doing now? We got some more folks there, now, who haven't spoken? Marjorie, do you want to? Anyone else? You didn't use all your time, you're welcome to come back, you have exactly. . .go ahead.

Anderson: I hope at the next meeting that you will really, that the City itself will really advertise them. I mean, look how few people are here. I don't think anybody knew what was on the agenda today. I mean, people don't read the Post Office and the bulletin board. Somehow, maybe the Pine Cone would help, I mean, I think they would probably be willing, if the City asked them, to do even a full page. I think it's, especially with their interest shown today.

White: Can I add something?

Anderson: Sure.

White: I don't want to take a shot at anybody or thing, but we've had three editorials, I believe, in three weeks on this issue and that particular paper isn't even here.

Anderson: I know, that's, I think, you know, you do have to hit us all on the head to get us out and so I hope you'll bang away.

White: O.K., anyone else? O.K., we'll close the public hearing, back to Council. General comments. Councilman Hydorn.

Hydorn: My only comment is that since there's such a scarcity of information on the Fort Ord process, it's so difficult, I mean, when you think about it, they're asking the public to make a decision on

July 12, 1996

Every rational and thinking resident of Monterey County must realize that a permanent and reliable additional source of water must be provided to even sustain our current population. To consider burdening the area with 51,700 additional residents is foolhardy as long as voters continue to paralyze efforts to provide additional sources of water. 1

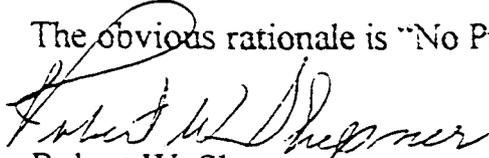
Given this obvious fact one would be looking for the current EIR to provide the answer as to the specific sources of additional water that have been approved by all government entities and the electorate. Since the report has no such specifics it is meaningless and as it reports "The Environmentally Superior Alternative" and the only rational conclusion is "No Project". 2

There is no logical reason for us to be forced to accept Fort Ord property. The property should be left under the control and protection of the Army until a permanent, adequate water source is in place. 3

To accept the property without adequate water, is to accept all of the costs and liabilities that come with ownership without any possibility of passing these costs and liabilities off to developers until there is water.

Obviously the Army wants to rid itself of the cost and liability of ownership. Why should we accept these costly problems, however, until water is available and the property is safe for occupation?

The obvious rationale is "No Project"!


Robert W. Shepney

1151 Lookout Road
Pebble Beach 93953-2912

MINUTES
Fort Ord Reuse Authority (FORA)
July 12, 1996
4:00 PM
12th Street Gate
Marina, CA

The meeting of the Fort Ord Reuse Authority was called to order by Chair Barlich on Monday, July 12, 1996 at 4:00 PM in the FORA Conference Room, at the 12th Street Gate, Marina, CA.

1. ATTENDANCE

Voting Members in attendance were: Supervisor Johnsen, 1st Vice Chair Supervisor Karas, Supervisor Perkins, MONTEREY COUNTY; Councilmember Perrine, Councilmember Wilmot, MARINA; 2nd Vice Chair Mayor Jordan, Councilmember Mancini, SEASIDE; Mayor Albert, MONTEREY; Mayor Pendergrass, SAND CITY; Mayor White, CARMEL; Mayor Koffman, PACIFIC GROVE; Mayor Barlich, DEL REY OAKS

Ex-Officio Members in attendance were: Donna Blitzer, 17th CONGRESSIONAL DISTRICT; Charles Van Meter, MONTEREY PENINSULA UNIFIED SCHOOL DISTRICT; Lora Martin, UNIVERSITY OF CALIFORNIA; Hank Hendrickson, CALIFORNIA STATE UNIVERSITY; COL Mettee-McCutchon, US ARMY; Phil Nash, MONTEREY PENINSULA COLLEGE; Dave Potter, TRANSPORTATION AGENCY OF MONTEREY COUNTY; Doran Barnes, MONTEREY SALINAS TRANSIT

2. APPROVAL OF CONSENT AGENDAS

Boardmember Karas moved to approve the consent agenda, Boardmember Perrine seconded; it passed unanimously.

3. Public Comment Period

Bill Woodworth commented there still needs to a water conservation plan on the base.

Chair Barlich asked the Board to continue item (b) of the Closed session to another date.

Go to next page.

Boardmember Perrine had a concern on that approach, however, Marina will be planning on having one or two workshops with the city and FORA staff will be asked to be there.

Chair Barlich believes we should have public meetings as well as meetings with the jurisdictions.

Boardmember Phil Nash suggested as the Monterey County Office of Education (MCOE) has a television cable system then this could be used. These types of programs have been successful in the past and this is a good way for people to communicate.

PUBLIC COMMENT

52 John Fisher from Pacific Grove finds the EIR is loaded with assumptions and the people need an opportunity to ask where the assumptions lead.

53 Debra Michelson pointed out agencies also have to respond to the EIR. AMBAG has grave concerns that the percentages used in this draft are not AMBAG numbers.

Boardmember Perkins asked Ms. Michelson about AMBAG's concerns. He commented it must be through AMBAG staff as he sits on AMBAG's Board and staff has never brought those concerns to the Board.

54 Curt Gandy has concerns on the clean-up process and handed out a memorandum.

FURTHER BOARD DISCUSSIONS

Boardmember Johnsen asked if it was possible to come to an agreement on the August 22 and September 27 as dates for supplemental Board meeting dates.

Mayor Koffman believes we need two dates before August 30, one for study session and one for public hearing on the EIR.

Les White gave the dates of Monday August 19 at the Conference Center or Oldemeyer Center, Monday August 26 could be at Salinas or CSUMB and Wed August 21 can be at CSUMB. If you do a work session you could go earlier than August 19 and August 22 could be the public hearing date. September 27 could be a discussion date on the Plan.

Boardmember Johnsen suggested the work session be held on the August 19 and August 22 for the public hearing, each in the evening. Mayor Koffman believes the study session needs to be at least a week away from the public

TO: FORA Staff
 FROM: Ventana Chapter of the Sierra Club
 DATE: July 15, 1996
 RE: FORA DEIR, Initial Review & Comments

Assumption: The FORA DEIR is flawed beyond repair.

The most reasonable option of all is a new staged DEIR -- one that would limit water consumption to a safe yield, which was proposed by the City of Salinas at the NOP stage.

- The choice of a program rather than a staged EIR may not conform with CEQA requirements. If FORA claims that it does conform. Then the adoption of an enforceable mitigation measures will be sought, requiring that the program EIR be continually revised and certified every five years or more frequently. 1
- The Preferred Alternative is growth inducing. We contend that this contradicts statements expressed in the DEIR. Specifically, we attack Sec. 2.3.2, "The initial phase of development to the year 2015 would not result in a growth inducing impact." Nowhere in SB 899 is there a mandate granting FORA authority to induce growth. Moreover, under CEQA, growth inducement of either the economy or population must be adequately, i.e., substantively addressed. 2

It is asserted that the Preferred Alternative is growth inducing. This contradicts AMBAG's official projection of growth out to 2015. Which is 0.9% v. the DEIR's of 2.61%. Since this growth-inducing goal is not authorized, under CEQA it cannot serve as a means of evoking "overriding considerations in the public interest" as a basis for adopting the project where environmentally superior alternatives are available. 3

- Full-faith disclosure required under CEQA is lacking. One example: Provisions for an additional water supply required for the Preferred Alternative are inadequately addressed. From where would water be imported? Where would storm water be impounded? Where would a desal plant be sited and would dumping of waste water into the Monterey Bay Sanctuary be permitted? 4

- Cleanup provisions are inadequate. For example, the Army plans to remediate the lead in the 3.2-mile stretch of beach, which had been used for many years as a firing range, to a lead concentration of 1860 mg of lead/kg of sand. State law requires a maximum concentration of 1000 mg/kg and possibly even down to 400 mg/kg. Moreover, the RI/FS reveals that any of these levels of lead are not protective of human health. It could result in blood levels of 86 ug/dL, some 9 times the "agency level of concern."

Under these circumstances, we ask whether it would be legal for the State Department of Parks and Recreation to accept the proposed transfer with that much lead remaining. Or if accepted, then require a uncontaminated sand cap and replanted with native plants. It is suggested that access through these reclaimed dunes be by raised walkways, only.

- AMBAG pointed out that the proposed mitigation's for loss of cumulative water supplies, traffic congestion, and adverse impact on the viewshed are inadequate. CEQA Guidelines 21002 require lead agencies to provide mitigation's where feasible. All of these Impacts can be feasibly mitigated. Rather than address mitigation measures for the cumulative Impact on water supplies, the DEIR (table 2.5-1, Sec. 4.4) -- delegates the responsibility to others. "prior to implementation of the proposed project," "Cities of Marina and Seaside and County of Monterey" would be responsible for "Writ(ing) a program that states that [they] shall carry out all actions necessary to ensure that the installation of water supply wells comply with [State and county] standards." We ask whether delegation of a task to an uncommitted governmental entity conforms to CEQA. We also ask what legal right does FORA have to impose an unfunded mandate on other governmental entities?
- We point out that there's ample anecdotal and factual evidence that live ammunition has been buried indiscriminately throughout much of the Fort Ord. (A portion of the land designated for CSUMB has not been transferred presumably, because of this problem.) We question this omission in the DEIR and ask that it be discussed fully in conformance with CEQA.

The DEIR does not adequately address unexploded ordnance (UXO):

- 1) p.4-64. FORA does not state whether UXO impacts the environment. CEQA requires a statement one way or the other.
- 2) The Army has not yet published EE/CA which would conclude whether UXO does or does not substantially impact the environment.

- Appendix G of the CEQA Guidelines states in part: "A project will normally have an Impact on the environment if it will

(a) Conflict with adopted environmental plans and goals of the community where it is located."

- Under the Coastal Act, a statement of consistency is required between the DEIR and existing plans. We believe that major revisions of the Monterey County General Program, the Coastal Plan and the Greater Monterey Peninsula Area Plan are required before the FORA program can be analyzed for consistency.

Bottom line: The DEIR should be withdrawn until after these revisions are adopted, then redrafted accordingly and recirculated. We stand ready to support this redrafting process, in the form of workshops and public forums.

Regards,

Ben Post
Chair Ventana Chapter of the Sierra Club
Box 5667
Carmel, CA 93923
408-624-8032

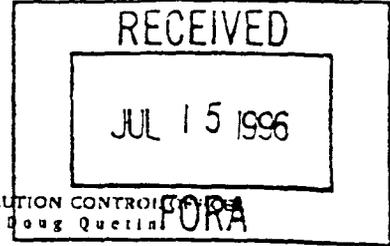
dm, am, jf, bp



MONTEREY BAY
Unified Air Pollution Control District

serving Monterey, San Benito, and Santa Cruz counties

24580 Silver Cloud Court • Monterey, California 93940 • 408/647-9411 • FAX 408/647-8501



AIR POLLUTION CONTROL DISTRICT
Doug Quetta FORA

July 12, 1996

Ann Hebenstreit
FORA
100 12th Street, Building 2880
Marina, CA 93933

**DISTRICT
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Monterey County

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Salinas

Walt Symons
Santa Cruz County

SUBJECT: DEIR FOR FORT ORD REUSE PLAN

Dear Ms. Hebenstreit:

District staff has reviewed the DEIR for the Fort Ord Reuse Plan which would include 22,232 dwelling units, 45,457 jobs and a population of 71,773 (including 20,000 CSUMB residential students). Our comments follow:

Traffic

The following comments are provided on the Traffic and Circulation Section since conclusions in this section are the basis for carbon monoxide modeling in the air quality impact analysis.

1. Page 4-72. The reference to Table 4.7-2 incorrectly indicates that the table depicts existing daily volumes and LOS. This information should be added to the table.
2. Page 4-73. The traffic impact analysis does not include the project's impact on the existing environment as required by CEQA. Instead, the impact section includes a modeling analysis based on a No Project alternative and two scenarios which include various degrees of mitigation. The EIR should be revised to include an analysis of the project's impacts on the existing environment. 2
3. Page 4-74. The highway projects listed under the "Financially Constrained" and "Optimistically Financed" scenarios should be identified as either mitigation measures or as part of the project (Fort Ord Reuse Plan). The analysis of mitigation measures should identify agencies responsible for implementation and monitoring and conclude whether they would reduce impacts below significance levels. 3

4. Page 4-74. Impacts of the proposed highway projects (mitigation measures) on the environment should be discussed as required by CEQA. H
5. Page 4-74. The Financially Constrained Scenario assumes many off-site improvements such as the widening of State Highway 68, State Highway 218 and Reservation Road. These projects are not in the Financially Constrained Action Elements of the current Metropolitan Transportation Plan which reflects those projects funded through 2010. Therefore, they are neither financially constrained nor conform to the State Implementation Plan. A Financially Constrained Scenario which only includes constrained on- and off-site improvements should be run and used in the mitigation effectiveness analysis. U

Air Quality

1. Page 4-94. The following paragraph is incorrect and should be revised: 6

During closure, the Army obtained emission reduction credits as Ft. Ord's emission sources were shut down...Emission reduction credits are important to the reuse of former Fort Ord lands because credits may be used to offset emissions associated with future economic growth (COE 1993).

The Army has not shut down its emission sources at Fort Ord. Rather, it has chosen to transfer the permits to new owners or to maintain the equipment under active permits. Therefore, the Army has not obtained emission reduction credits. Additionally, emission reduction credits are only needed in the District's permitting process for major sources (over 137 lbs/day of reactive organic gases or oxides of nitrogen). In general, emissions from population and economic growth related to Fort Ord are accommodated in the planning process rather than through emission reduction credits. The 1994 AQMP accommodates projected growth at Fort Ord through the year 2005.

2. Page 4-94. The District's Rule 1000, Toxic Air Contaminants, should also be identified as part of the regulatory structure for toxic airborne pollutants. 7
3. Page 4-95. This paragraph should be updated to include the following information (attachment): the State ozone standard was exceeded eight days in 1995 and seven days in 1996 (through 7/9/96). The State PM₁₀ standard was exceeded one day in 1995. 8
4. Page 4-96. The following sentence should be clarified: 9

A consistency analysis of the proposed project with the adopted Air quality Management Plan would be required as part of the approval process.

A consistency determination is a requirement of the California Environmental Quality Act rather than air quality rules. Such a determination is used by the District to determine a project's cumulative impact on regional air quality. A consistency determination for the proposed project should be included in a revised EIR.

5. Page 4-96. The document states that the Transportation Conformity Rule does not apply to the proposed project. While highway projects do not require a Conformity Finding at this time, the feasibility of those regionally significant projects that are proposed as mitigation measures depends on finding them in conformity. 10
6. Page 4-98. The DEIR states that Air Quality Policies A-1 through A-3 apply to the Cities of Seaside and Marina. These same policies should be identified as mitigation measures in the EIR for the other jurisdictions involved in development at Fort Ord. 11
7. Page 4-99. Program A-2.1 states, "As a Responsible Agency, the MBUAPCD oversees issuance of air pollution permits for toxic air contaminants, and thus is responsible for U.S. EPA health standards as they relate to air emissions." This program should be restated as follows: "As a Responsible Agency, the MBUAPCD implements rules and regulations for many direct and area sources of criteria pollutants and toxic air contaminants." 12
8. Page 5-6. The carbon monoxide analysis should be revised based on a revised traffic analysis as described earlier in this letter. 13
9. Page 5-8. "Sensitive receptors" are not defined in the analysis. The District considers all public members who would be exposed to 8 hour concentrations of carbon monoxide above the standard as sensitive receptors. 14
10. As noted earlier, a consistency determination for the project should be prepared to address the project's cumulative impact on regional air quality. Since the 1994 AQMP only plans to the year 2005, a consistency determination can only be made up to that point. A mitigation measure should be included requesting the District to accommodate Fort Ord forecasts in future air quality plans. 15

Since major revisions are needed to address the District's concerns, we recommend that a revised Draft EIR be prepared and recirculated. District staff is available to work with you to expedite responses to comments on air quality. Please do not hesitate to call if you have any questions or require assistance.

Sincerely,



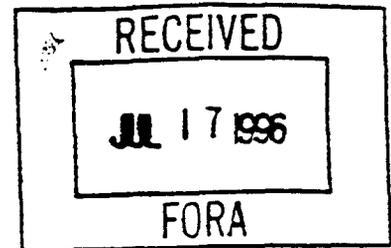
Janet Brennan
Supervising Air Quality Planner
Planning and Air Monitoring
Division

cc: Nicolas Papadakis, AMBAG

Attachment

NORTH CENTRAL COAST AIR BASIN OZONE EXCEEDANCE DAYS

MONTH	1993	1994	1995	1996
APRIL				4/30 HOLLISTER 10
MAY				5/11 PINNACLES NM 11 5/11 SCOTT'S VALLEY 10
JUNE	6/16 PINNACLES NM 10 6/23 PINNACLES NM 10 6/24 CARMEL VALLEY 11 6/24 WATSONVILLE 10 6/25 HOLLISTER 10	6/09 HOLLISTER 10 6/24 PINNACLES NM 10 6/28 PINNACLES NM 10	6/23 PINNACLES NM 10	6/03 HOLLISTER 10 6/03 PINNACLES NM 11 6/08 PINNACLES NM 11 6/29 SCOTT'S VALLEY 11 6/29 PINNACLES 11
5-9-95 7-14 JULY	7/31 SCOTT'S VALLEY 10 7/31 MONTEREY 11	7/07 PINNACLES NM 10	7/14 SCOTT'S VALLEY 10 7/15 HOLLISTER 10	7/01 HOLLISTER 10 7/05 PINNACLES NM 10 AS OF 7/09/96
AUGUST	8/01 SCOTT'S VALLEY 10 8/27 HOLLISTER 10	8/11 PINNACLES NM 10 8/12 PINNACLES NM 10	8/01 PINNACLES NM 14 8/02 PINNACLES NM 11 8/12 PINNACLES NM 10 8/21 PINNACLES NM 10	
SEPTEMBER	9/08 PINNACLES NM 10 9/08 SCOTT'S VALLEY 10 9/09 PINNACLES NM 10 9/26 SCOTT'S VALLEY 10 9/28 SCOTT'S VALLEY 10 9/28 PINNACLES NM 11		9/18 PINNACLES NM 10	
OCTOBER	10/30 PINNACLES NM 10			



July 15, 1996

Mr. Jack Barlich, Chairman
Fort Ord Reuse Authority
100 12th Street, Building 2880
Marina, CA 93933

Dear Chairman *Jack* Barlich:

The City Council of Monterey met on July 7, 1996 and approved submission of the attached preliminary comments and technical corrections on the Base Reuse Plan and Environmental Impact Report (EIR). The comments are preliminary because we intend to submit additional comments by the extended EIR comment deadline of August 30. The City Council has set August 28 to develop our final comments for submission to FORA.

Prior to the August 28 meeting, the City Council will host a community workshop on the Plan and EIR. The workshop would be open to any member of the community, not just Monterey residents. The purpose of the workshop is to have FORA present the proposed Plan and EIR. The workshop would be for information and for citizens to ask questions and discuss the plan. The workshop is not intended to obtain formal comments on the EIR.

Monterey staff will contact FORA staff on appropriate dates for the Workshop. We would request that FORA staff and the Base Reuse Plan consultants present the Plan and EIR and participate in the discussion. The City of Monterey will forego a later presentation by the consultants on the plan proposals for the City of Monterey annexation area of Fort Ord.

If you have any questions, please contact City Manager Fred Meurer or Bill Fell in the Community Development Department.

Sincerely,

Dan Albert
Mayor

7/17/96

Shawyer, Copies please to me & Anne.
57-1
Thig

Attachments: 1) Preliminary Comments on FORA Base Reuse Plan and Draft EIR
2) Technical Corrections

cc: City Council
Planning Commission
City Manager
Community Development Director
Planning Services Manager (Advance)
Les White, Executive Director, FORA

ATTACHMENT I

PRELIMINARY COMMENTS ON FORA BASE REUSE PLAN AND DRAFT ENVIRONMENTAL IMPACT REPORT

- 1) Fort Ord growth should be carefully managed relative to available water supply and transportation facilities. The costs of additional water supply and transportation facility improvements as well as capital and operating costs of sewer, schools, fire and police services should be carefully considered and the timing (financing and construction) should coincide with Fort Ord development. | 1
- 2) Base Reuse Plan text (Pg 3-144) should be changed to reflect that to date, Monterey has been unable to obtain Polygon 29c through a Public Benefit Conveyance for Corporation Yard use. | 2
- 3) The General Development Character and Design Objective section of the Plan (Pg 3-144) should be changed to state that City of Monterey development and design standards for Ryan Ranch at Monterey be followed in the York Road Planning Area to be consistent with the existing Ryan Ranch design standards. | 3
- 4) The Plan should state that a small section of 8 Mile Gate Road between York Road and South Boundary Road needs to be constructed in the York Road Planning Area. | 4
- 5) The Plan should state that 80 foot wide floating easements need to be provided connecting Ryan Ranch Road to South Boundary Road and Upper Ragsdale Road to South Boundary Road in the York Road Planning Area. | 5
- 6) The Plan (Pg 3-67) should be corrected to state that Del Monte Avenue will require widening to four and five lanes (not "...to six lanes from Monterey to Highway 1) from Camino El Estero to Highway 1 due to Fort Ord reuse traffic impacts. FORA's reimbursing the City of Monterey the \$2,200,000 FORA fair share cost of Del Monte Avenue should be changed to a transit in-lieu fee. | 6
- 7) The City of Monterey thanks the FORA Board for extending the EIR review period to August 30, setting an additional public hearing August 22 and a study session on the Plan and EIR July 29. | 7

ATTACHMENT 2

Technical Corrections to:
Public Draft Fort Ord Reuse Plan (5/96), Vol. I

TEXT

<u>Page</u>	<u>Comment</u>
n/a	Need to have a table giving the comprehensive list of all polygons, their land use designations, acreage, and in which planning area they are located. The Draft EIR, May 1996, has a good table (without acreage) on page 3-5 (Table 3.2-1, Revised Land Use Areas.) This table could be modified to address this request.
3-98	Table 3.3-1. Need to include the Public Facility/Institution (Monterey Corporation Yard) planned use under the York Road Planning Area listing.
3-130	Table 3.10-1. Need to include the Public Facility/Institution (Monterey Corporation Yard) planned use under the York Road Planning Area listing.
3-143	3.10.6 York Road Planning Area: Stipulate Polygons 29b and 29d as those areas within the Office Park/R&D District.
3-144	Community Park District: Stipulate Polygon 29e as the site reserved as a park. Remove the language "potentially temporary park" and replace with "community park."
3-144	Monterey City Corporation Yard District: Stipulate Polygon 29c as the site referenced here.

MAP

Page Map Comment

Note #1: Unless otherwise indicated, all maps listed below depict incorrect boundaries for Polygons 31a, 31b, 29c, and 29d of the South Gate and York Road Planning Areas. (The land use designations are correct.) For the correct version of the boundaries, ↓

refer to Figure 1.2.1, *Land Use Polygons for Base Reuse in the Fort Ord Reuse Infrastructure Study, Master Plan Report, November 1994.*

17
Cont'd

- 3-87 3.6-2 *Draft Habitat Management Framework - See Note #1.*
- 3-99 none *CSUMB -See Note #1.*
- 3-100 none *UCMBEST - See Note #1.*
- 3-103 none *CSUMB Planning Area, Marina Portion - See Note #1.*
- 3-105 3.8-1 *Draft Marina Planning Areas - See Note #1.*
- 3-107 none *Existing City of Marina Neighborhoods - See Note #1.*
- 3-108 none *Town Center Planning Area - See Note #1.*
- 3-114 none *Airport Planning Area - See Note #1.*
- 3-118 none *CSUMB Planning Area, Seaside Portion - See Note #1.*
- 3-118 none *University Planning Area - See Note #1.*
- 3-119 3.9-1 *Draft Seaside Planning Areas - See Note #1.*
- 3-125 none *Seaside Residential Planning Area - See Note #1.*
- 3-129 none *Fort Ord Dunes State Park - See Note #1.*
- 3-131 3.10-1 *Draft County Planning Areas - See Note #1.*
- 3-133 none *CSUMB/Recreational Planning Area - See Note #1.*
- 3-135 none *Reservation Road Planning Area - See Note #1.*
- 3-139 none *Eucalyptus Road Planning Area - See Note #1.*
- 3-141 none *South Gate Planning Area - See Note #1.*
- 3-143 none *York Road Planning Area - See Note #1.*
- 3-145 none *BLM Habitat Management/Recreation Areas - See Note #1.*

Technical Corrections to:
Public Draft Fort Ord Reuse Plan (5/96), Vol. II

TEXT

<u>Page</u>	<u>Comment</u>
4-127	Table 4.3-3, <i>Fort Ord - 2015 Park Program for all Jurisdictions</i> : Unless Polygon 29e is not going to be improved until after 2015, need to include Polygon 29e under Monterey County listing.
4-200	<i>Biological Resources Policy A-5</i> : All references to "NRMA" should be deleted from this section (starting on page 190.) According to the Draft EIR, May 1996, p. 3-7, the NRMA designation was redesignated to "Habitat Management" (Polygon 25.) In addition, need to include a map showing the boundaries of the "Habitat Management" area.

MAP

<u>Page</u>	<u>Map</u>	<u>Comment</u>
Note #1		Unless otherwise indicated, all maps listed below depict <u>incorrect boundaries</u> for Polygons 31a, 31b, 29c, and 29d of the South Gate and York Road Planning Areas. (The land use designations are correct.) For the correct version of these boundaries, refer to the <i>Public Draft Fort Ord Reuse Plan, Appendix A: 2/21/96, Draft HMP Implementing/Management Agreement, Exhibit B: HMP Planning Areas</i> .
4-17	4.1-4	<i>Draft Sphere of Influence and Annexation Requests</i> - See Note #1. Polygon 29b, c, d, and e annexation colors are correct. The City of Monterey proposes to include these polygons in its Sphere of Influence and Annexation. Figure 4.1 - 4 incorrectly shows Monterey's existing Sphere of Influence. It doesn't extend east of York Road on the south side of Highway 68. Area north of Fort Ord boundary is correct but needs to be relabeled "Area of Planning Concern" and legend needs to be re-keyed.
4-23	4.1-7	<i>County of Monterey Land Use Concept</i> - See Note #1.

4-187

4.4-1

Oak Woodland Areas - See Note #1

|

*Technical Corrections to:
Public Draft Fort Ord Reuse Plan, Draft EIR (5/96)*

TEXT

<u>Page</u>	<u>Comment</u>	
2-8	Table 2.4-1: The proposed project land use categories percentages should be corrected as they currently add up to 101%.	18
4-18	Item no. 10: Reference to "NRMA" area needs to be changed to "Habitat Management" area, with a polygon number for further clarification. "NRMA" is an old designation, according to Table 3.2-1, p. 3-7. The new land use designation is "Habitat Management". This correction needs to be made throughout the EIR. Note: none of the maps in the Draft Reuse Plan or the EIR indicate an "NRMA" designated area.	19
4-40	1st paragraph: Reference to Appendix A should be changed to read <i>Appendix B: Business and Operations Plan - Public Facilities Implementation Plan.</i>	20

MAP

<u>Page</u>	<u>Map</u>	<u>Comment</u>	
Note #1		Unless otherwise indicated, all maps listed below depict <u>incorrect boundaries</u> for Polygons 31a, 31b, 29c, and 29d of the South Gate and York Road Planning Areas. (The land use designations are correct.) For the correct version of these boundaries, refer to the <i>Public Draft Fort Ord Reuse Plan, Appendix A: 2/21/96, Draft HMP Implementing/Management Agreement, Exhibit B: HMP Planning Areas.</i>	21
3-4a	3.2-1	<i>Proposed Project Land Use Concept: See Note #1.</i>	
3-4b	3.2-2	<i>Revised Land Use Areas: See Note #1.</i>	
3-10a	3.6-1	<i>Sphere of Influence and Annexation Requests. See Note #1</i>	
6-15a	6.4-1	<i>No Project Alternative Land Conveyances: See Note #1</i>	

Technical Corrections to:
*Public Draft Fort Ord Reuse Plan, Appendix B, Business and
Operations Plan*

MAP - Comprehensive Business Plan, May 28, 1996

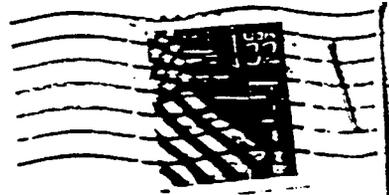
Page Map Comment

Note #1 Unless otherwise indicated, all maps listed below depict incorrect boundaries for Polygons 31a, 31b, 29c, and 29d of the South Gate and York Road Planning Areas. (The land use designations are correct.) For the correct version of these boundaries, refer to the *Public Draft Fort Ord Reuse Plan, Appendix A: 2/21/96, Draft HMP Implementing/Management Agreement, Exhibit B: HMP Planning Areas.*

22

IV-2 3.3-1 Draft Land Use Concept: Ultimate Development: See Note #1.

Mr. Richard Robinson
118 Hacienda Dr
Monterey, CA 95040-2518



July 21-96

Fort Ord Lease Authority;

Regarding ¹Fort Ord redevelopment

Why can't we become more
responsible to ourselves and
our future offspring!

Let's not be like drunken
people with our RESOURCES.

Los Angeles - San Jose,
(where I was born when population
was 45,000 in 1920)

Scotts Valley - Santa Cruz -

All busting at the seams,
with no regard for water &
other resources, like air and
traffic control.

Oh well - it may be too damn
late. ~~When~~ we meet the
enemy - and they are us!

Bring on the illegals, I. K. Robinson



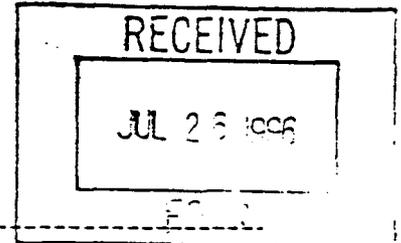
Fort Ord Reuse Authority

DRAFT FORT ORD REUSE PLAN/EIR COMMENTS FORM

If you use this form to submit your comments, it is important that you include your name, address, and phone number below. You can use this form to submit your comments, or you can mail or fax your written comments directly to FORA. Your comments must be received no later than 5:00pm on Monday, July 15, 1996 unless otherwise announced.

Comments should be directed to:

Fort Ord Reuse Authority
100 12th Street Building 2880
Marina, CA 93933
Phone: (408) 883-3672 Fax: (408) 883-3675



PLEASE PRINT THE FOLLOWING INFORMATION:

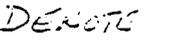
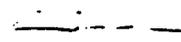
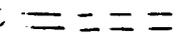
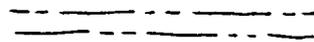
Name: JOHN W FISCHER *JWF*
Address: 230 GROVE ACRE #313
City: PACIFIC GROVE Zip: 93950 2342 Phone: 655-3607

COMMENTS: (please also use the back of this sheet or attach additional sheets if needed).

SUMMARY

I AM FOR A REASONABLE REUSE OF THE FORMER FORT ORD BASE AND FEEL THAT IT CAN BE ACCOMPLISHED THROUGH THE FOUR REQUIREMENTS, A THROUGH D, OF THE FORT ORD REUSE AUTHORITY ACT AS LISTED IN SECTION 2.0, SUMMARY, ON PAGE 2-1 OF THE DRAFT EIR. HOWEVER, I ALSO FEEL THAT THE EIR DOES NOT ADDRESS STRAITFORWARDLY, CLEARLY OR COMPLETELY ON THE ISSUES OF TRANSPORTATION, WATER, AIR AND POPULATION; NOT ONLY THE PROPOSED USES OF THE PROPERTY, BUT ON THE EFFECTS TO THE REGION AS A WHOLE. THEREFORE, I DON'T SEE THE DRAFT EIR AS DEFINING MITIGATIONS NEEDED TO MEET REQUIREMENTS OF C AND D.

GENERAL COMMENTS

1. THE DRAFT EIR SUMMARY IS HARDLY A SUMMARY IN THAT THE READER IS DIRECTED TO MOVE FROM SECTION TO SECTION TO COMPLETE THE DISCUSSION OF AN ITEM. THE SUMMARY IS NOT "USER FRIENDLY" AND I WONDER IF IT IS LEGAL. 3
2. AT LEAST TWO METHODS ARE USED ON MAPS TO DENOTE LINES OF JURISDICTION,  vs. , WHICH CAN MAKE COMPARATIVE INTERPRETATIONS DIFFICULT. 4
3. HOW MANY STUDENTS EQUAL 1 FTE? 5
4. SEVERAL MAPS SHOW  THROUGH A PORTION OF THE BLM PROPERTY BUT THE LEGEND NOTES NOTHING. IS THIS THE PROPOSED SR66 BY PASS FREEWAY? 6
5. SEVERAL MAPS SHOW  PARALLELING SR1. THE LEGEND SAYS NOTHING ABOUT IT. 7

SPECIFIC COMMENTS

TRANSPORTATION - HATTON CANYON FREEWAY 8

1. SECTION 2.3.1, PAGE 2-4, CUMULATIVE IMPACTS: TABLE 5.1.1 SAID TO LIST REASONABLY FORESEEABLE FUTURE PROJECTS IN MONTEREY COUNTY.
2. TABLE 5.1.1, PAGE 5-1, DOES NOT LIST SR1 HATTON CANYON PROJECT (COMPLETION OF HATTON CANYON IMPROVEMENTS IS AN ASSUMPTION OF THE REUSE PLAN ON PAGE 3-66, VOL. 1)

3. SECTION 5.1.7, PAGE 56, TRAFFIC AND CIRCULATION NOTES TRAFFIC ANALYSIS IS PRESENTED IN SECTION 4.7. 9
4. SECTION 4.7, PAGE 4-71: SR 1 IS DECLARED MOST SIGNIFICANT ONLY AS FAR AS JUST NORTH OF CARMEL.
5. SECTION 4.7, PAGE 4-74, TABLE 4.7.2: SR 1 HATTON CANYON IMPROVEMENT IS TO CONSTRUCT A NEW FREEWAY, WITH SCENARIO COMMENTS NOTED (SEE SECTION 4.7.4)
6. SECT 4.7.4, PAGE 4-77 ENVIRONMENTAL IMPACTS AND MITIGATION DOES NOT DEEM THE HATTON CANYON FREEWAY IMPORTANT ENOUGH TO INCLUDE IT IN THE CURRENTLY COMMITTED UNDER THE "FINANCIALLY CONSTRAINED" OR AS A KEY IMPROVEMENT UNDER "THE "OPTIMISTIC FINANCING" SCENARIOS. ALSO INTERESTING THE HATTON CANYON FREEWAY WAS INCLUDED AS A COMMITTED OFF-BASE PROJECT UNDER THE "POM USE ONLY" SCENARIO WHICH DOES NOT APPLY TO THE PROPOSED REUSE PLAN. THE SECTION ALSO NOTES THAT FORECAST VOLUMES AND SERVICE LEVELS FOR KEY OFF-SITE ROADWAY SEGMENTS ARE PROVIDED IN

TABLE 4.7.3.

7. SECTION 4.7.4, PAGE 4-79, TABLE 4.7-3: NO MENTION OF THE HATTON CANTON FREEWAY.

8. SECTION 4.7.4, PAGE 4-84, CIRCULATION ELEMENT: STREETS AND ROAD POLICY A-1 AND PROGRAMS A-1.1 AND A-1.2 APPEAR TO SAY THAT FORA AND THE JURISDICTIONS WOULD HAVE TO HELP FUND THE HATTON CANTON FREEWAY TO MITIGATE THE IMPACT ON THE REGIONAL ROADWAY SYSTEM IMPROVEMENTS.

THE DRAFT EIR, TO ME, IS TWO-FACED ABOUT THE IMPORTANCE OF THE HATTON CANTON FREEWAY TO THE REUSE PLAN. IF THE FREEWAY IS IMPORTANT, THE ASSUMPTION OF ITS COMPLETION BY 2015 IS A WONDERFUL DODGE, WITH NO NEED TO PRESENT PROBLEMS AND MITIGATIONS. IF THE FREEWAY IS NOT IMPORTANT, WHERE ARE THE MITIGATIONS FOR THE ESTIMATED TRAFFIC IN AND OUT OF FORT ORD FROM THE CARMEL AREA ON SR 1 IF THE FREEWAY IS NOT BUILT?

TRANSPORTATION - SR 68 BYPASS FREEWAY

1. TABLE 5.1.1, PAGE 5-1 DOES LIST SR 68 (COMPLETION OF SR 68 BY-PASS FREEWAY IS AN ASSUMPTION OF THE REUSE PLAN ON PAGE 3-66, VOL. 1).

2. SECTION 4.7, PAGE 4-71: SR 68 IS DECLARED "A MOST SIGNIFICANT" ROADWAY

3. SECTION 4.7, PAGE 4-74, TABLE 4.7-2: LISTS SR68 10

WITH CONSTRUCTION OF A 4-LANE BYPASS
FREEWAY AND SCENARIO COMMENT NOTED
(SEE SECTION 4.7.4)

4. SECTION 4.7.4, PAGE 4-75: SR68 BYPASS FREEWAY
IS A MAJOR NEW REGIONAL FACILITY UNDER
THE "OPTIMISTIC FINANCING" SCENARIO.

5. SECTION 4.7.4, PAGE 4-79, TABLE 4.7-3: SR68
FREEWAY BYPASS IS ESTIMATED TO HAVE A
DAILY VOLUME INCREASE OF 11,900 VEHICLES
OVER SR68 HIGHWAY.

6. APPENDIX B, PAGE B-2: STATE HIGHWAY 68:
AN IMPROVED SR68 WOULD PROVIDE AN
ATTRACTIVE ALTERNATIVE TO BLANCK AND DAVIS
ROADS FOR TRAVEL BETWEEN US101 AND THE MONTEREY
PENINSULA.

7. SECTION 2.3.4, PAGE 2-23, UNAVOIDABLE
SIGNIFICANT IMPACTS, TABLE 2.5-1:
ARTICLE 4.7, TRAFFIC CIRCULATION;
CUMULATIVE TRAFFIC AND CIRCULATION
IMPACTS ARE CALLED "UNAVOIDABLE
SIGNIFICANT" WHICH MEANS MITIGATION
IS NOT AVAILABLE TO REDUCE THE
IMPACT TO A LESS-THAN-SIGNIFICANT
LEVEL (SEE SECTION 2.3.4, PAGE 2.5,
UNAVOIDABLE SIGNIFICANT IMPACTS
AND SECTION 5.4, PAGE 5-14,

UNAVOIDABLE SIGNIFICANT IMPACTS). THE DRAFT EIR PLAINLY STATES THAT THE SR 63 BYPASS FREEWAY IS IMPORTANT, THEN STATES IT CAN'T BE MITIGATED TO A LESS-THAN-SIGNIFICANT LEVEL. FINALLY THE REUSE PLAN ASSUMES SR 63 BYPASS FREEWAY WILL BE BUILT BY YEAR 2015. SEEMS TO BE ANOTHER BEAUTIFUL DODGE. SHOULDN'T THE EIR SAY SOMETHING ABOUT WHAT THE EFFECTS ARE IF IT ISN'T BUILT SO THAT THE REUSE PLAN CAN BE PREPARED WITH THAT SCENARIO.

10

WATER

SECTION 4.5.1, PAGE 4-46, GROUND WATER QUALITY: IS THE MARINA WATER DISTRICT NOW TAKING OR PLANNING TO TAKE WATER FROM ANY AQUIFER WHERE IT IS KNOWN THERE WILL BE SEA WATER INTRUSION IF OVERDRAFTING OCCURS. IF SO, WHICH AQUIFER(S), AT WHAT LEVEL(S) AND WHAT WOULD BE THE EFFECT ON THE TOTAL WATER AVAILABLE TO THE DISTRICT?

11

AIR

TABLE 2.4-2, PAGE 2-13: ARTICLE 8, CLIMATE AND AIR QUALITY - NOTES THAT POTENTIAL VIOLATIONS OF AMBIENT AIR QUALITY WOULD BE REDUCED... WHILE THE REUSE PLAN SECTION 4.4.4, PAGE 4-23, REGIONAL AIR QUALITY PLANNING STATE THAT THE

12

"BASIN" IS NOW CLASSIFIED AS A NONATTAINMENT AREA FOR THE STATE AND FEDERAL OZONE STANDARDS AND THE STATE PM10 STANDARDS. (NONATTAINMENT MEANS DOES NOT MEET AMBIENT AIR QUALITY STANDARDS).

2. SECTION 4.7.4, PAGE 4-90, CIRCULATION ELEMENT:

WHAT POLICY OR PROGRAM IS INCLUDED TO REQUIRE PEOPLE TO WALK OR BICYCLE IN CERTAIN AREAS TO LIMIT THE USE OF VEHICLES IN THOSE SAME AREAS?

PROVIDING INCREASED OPPORTUNITIES FOR EFFECTIVE ALTERNATIVES TO AUTOMOBILE TRAVEL WILL ONLY WORK IF ALL KNEW THAT WALKING AND BIKING ARE THE PREFERRED MODES OF TRANSPORTATION AND THAT USE OF THE AUTOMOBILE WILL BE LIMITED. IF NOT DONE, AIR QUALITY WILL CONTINUE TO DEGRADE AND MITIGATION WILL BE REQUIRED.

POPULATION

1. AN UNDERSTANDING OF THE EXPECTED POPULATION GROWTH FOR SEASIDE, MARINA, THE FORT ORD SITE AND THE MONTEREY PENINSULA REQUIRES THE BEST DATA AVAILABLE AND THE SOUNDEST ASSUMPTIONS.

FOR FUTURE GROWTH.

2. SECTION 4.2.1, PAGE 4-21 NOTE THE 1991
BASELINE POPULATIONS.

SEASIDE	40,233
MARINA	26,830
FORT ORD	<u>31,270</u>
	98,333

3. TABLE 2.2-1, PAGE 2-11, VOL. 1, REUSE PLAN:
CALIFORNIA DEPARTMENT OF FINANCE
POPULATION DATA FOR 1995.

SEASIDE	30,102
MARINA	18,356
MONTEREY	104,853
PENINSULA (MP)	

4. TABLE 2.2-3, PAGE 2-15, VOL. 1, REUSE PLAN:
AMBAG PROJECTIONS FOR 1995.

SEASIDE	26,942
MARINA	16,595
MP	97,032

NOTE THAT THE AMBAG PROJECTIONS
FOR 1995 ARE LOWER THAN THE
DEPARTMENT OF FINANCE DATA
IN (3) ABOVE.

5. TABLE 4.2.1, PAGE 4-20. YEAR 2000
POPULATION ESTIMATES.



SEASIDE 28,650

MARINA 18,950

13

6. PAGE 5-12: FORT ORD SITE POPULATION IS ESTIMATED TO BE 38,859 IN THE YEAR 2015, INCLUDING 10,000 FTE STUDENTS AND, APPARENTLY, 4,872 MILITARY AND FAMILIES ASSOCIATED WITH THE PRESIDIO OF MONTEREY ANNEX. THE 38,859 IS AN INCREASE OF 7,557 OVER THE 1991 BASELINE POPULATION.

7. THE FOREGOING SETS THE STAGE FOR CONSIDERING POPULATION PROJECTIONS FOR THE YEAR 2015 (TABLE 1, PAGE 11). THESE ESTIMATES CONSIDER GROWTH IN SEASIDE, MARINA, FORT ORD SITE, THE REST OF THE MONTEREY PENINSULA (RMP) AND THE MONTEREY PENINSULA (MP). MARINA AND FORT ORD SITE ARE CONSIDERED PART OF THE MONTEREY PENINSULA IN BOTH THE DRAFT EIR AND REUSE PLAN DISCUSSIONS. MY CONCERN IS THAT THE MOST CONSERVATIVE PROJECTION ESTIMATES GROWTH OF ALMOST 9,000 FOR THE PENINSULA. THE WORST CASE SCENARIO ESTIMATES

AN INCREASE OF ALMOST 16,000 RESIDENTS. ECONOMIC RECOVERY IS VERY IMPORTANT BUT A MAJOR EXPANSION OF POPULATION IN THE REGION WITHOUT MITIGATIONS TO RELIEVE IMPACTS ON THE QUALITY OF LIFE AND THE ENVIRONMENTAL RESOURCES IS QUITE ANOTHER. WHERE IS A DISCUSSION OF THE IMPACTS AND PROPOSED MITIGATIONS?

13

ADDITIONAL

15

1. I FEEL THIS DRAFT EIR SHOULD HAVE BEEN PREPARED IN A PHASED-IN MANNER SO THAT THE REUSE PLAN COULD HAVE BEEN PREPARED IN THE SAME MANNER. THE DRAFT EIR AND THE REUSE PLAN INCLUDE MITIGATIONS AND ASSUMPTIONS THAT WILL NOT BE ACCOMPLISHED, IF AT ALL, AND POPULATION GROWTH SHOULD BE LIMITED UNTIL THE ENABLING MITIGATIONS ARE COMPLETED.

2. SECTION 5.4, PAGE 5-15, UNAVOIDABLE SIGNIFICANT IMPACTS: FEIS SHOULD PROCEED VERY CAREFULLY IF IT

15
DECIDES TO CONSIDER A VOTE TO
ADOPT A "STATEMENT OF OVERRIDING
CONSIDERATIONS" TO APPROVE A
REUSE PLAN THAT WILL FOREVER
DEGRADE THE REGIONAL QUALITY
OF LIFE OF THE MONTEREY
COMMUNITY AND DESTROY THE
UNIQUE ENVIRONMENTAL RESOURCES
OF THE AREA² (1 AND 2 ARE FROM
SECTION 1.0, PAGE 1-1, INTRODUCTION,
UNDER THE FORT ORD REUSE
AUTHORITY ACT REQUIREMENTS
OF FORA.

CC: MAYOR AND CITY COUNCIL OF
CITY OF PACIFIC GROVE

TABLE 1

POPULATION AND PROJECTIONS

1991 ³ BASELINE	1995 ³ ACTUAL	2015 ⁴ AMBAG	2015 ⁴ RECOVERY	2015 ⁵ FISCHER
SEASIDE 40,288	SEASIDE 30,102	SEASIDE 47,132	SEASIDE 40,288	SEASIDE 33,231
MARINA 26,830	MARINA 18,356	MARINA 43,655	MARINA 26,830	MARINA 27,122
FORT ORD 31,210	FORT ORD UNK	FORT ORD NA	FORT ORD 38,859	FORT ORD 30,859
RMP ¹ 54,014	RMP ¹ 56,491	RMP ¹ 62,221	RMP ¹ 64,227	RMP ¹ 62,227
STUDENTS NA	STUDENTS UNK	STUDENTS 10,047	STUDENTS NA	STUDENTS NA
MP ² 152,482	MP ² 104,955	MP ² 163,047	MP ² 168,204	MP ² 161,439

59-12

LEGEND

1. RMP: REST OF MONTEREY PENINSULA
2. MP: MONTEREY PENINSULA
3. DEPT. OF FINANCE
4. SEASIDE AND MARINA POPULATIONS ARE 1991 BASELINE
5. 1995 POPULATIONS FOR SEASIDE AND MARINA PROJECTED FROM 2000-2015 AT AVERAGE ANNUAL GROWTH RATE FOR 1980-1990 FROM TABLE 4.2-1, PAGE 4-20.

C. ANN



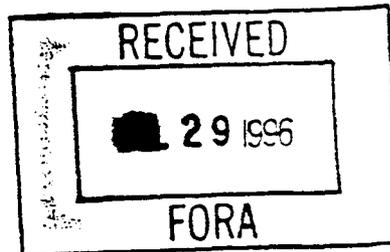
CITY OF DEL REY OAKS

650 CANYON DEL REY ROAD • DEL REY OAKS, CALIFORNIA 93940

OFFICE OF
Mayor

TELEPHONE (408) 394-8511

July 25, 1996



Mr. Les White, Executive Director
FORA
Twelfth Street
Marina CA 93933

Re: FORT ORD REUSE PLAN / DRAFT EIR

Dear Mr. White:

Thank you for the opportunity to review the four volume Fort Ord Reuse Plan and Draft Environmental Impact Report. This massive undertaking appears to be sound and factual overall, however a review by the City of Del Rey Oaks requires that the following comments and suggested changes be submitted as part of the overall record.

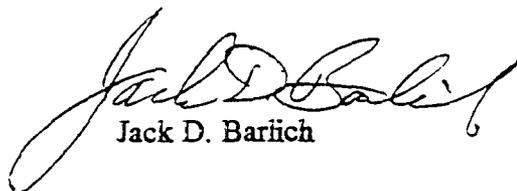
Of prime concern is the failure of the documents to acknowledge the role of proposed city annexations. This represents a major problem for the City of Del Rey Oaks as we have indicated to you and your staff in previous correspondence and at various stages in the review process. This situation applies not only to the City of Del Rey Oaks but to the City of Monterey, and potentially to the cities of Seaside and Marina. The text and maps in the Reuse Plan and DEIR must be consistent with the FORA Board approved Reuse Plan, reflect current FORA policy, and state the facts clearly and consistently.

There are other technical problems, inconsistencies and mistakes in the document that need immediate attention. These include new page IV-18 (distributed at the admin committee meeting of 6/6/96) that has a dramatic impact on the role and financial future of FORA. These new numbers must be corrected and cross referenced in numerous places in the text and must be made consistent throughout all of the sections to convey the true nature of the overall financial picture.

I appreciate the time and effort you and your staff have invested in these documents. We have organized our comments to correspond with the four volumes and their page numbers to the maximum extent possible.

We are continuing to analyze the documents and may submit additional comments before the August deadline. Thank you for your courtesies and prompt attention to these important issues. | 2

Sincerely,



Jack D. Barlich

cc: Steve Endsley, City Manager
Joe Cavanaugh, Community Development Consultant
Joe Russell, Vice Mayor

JAC:ap

~~delivered~~

ATTACHMENTS: COMMENTS

CITY OF DEL REY OAKS
MEMORANDUM

TO: LES WHITE, FORA Executive Director
FROM: J. CAVANAUGH, Community Development Consultant
DATE: June 28, 1996
SUBJECT: Comments On Reuse Plan and Draft EIR

VOLUME 1: CONTEXT AND FRAMEWORK

3

PAGE 1-1 TEXT, LINE 4

This sentence indicates that the elements described are for only three land use /political jurisdictions . In fact the Reuse Plan contains five land use jurisdictions based upon the proposed annexations by the Cities of Del Rey Oaks and Monterey. This error should be corrected throughout the entire four volumes.

PAGE 1-2 SECTION 4

A sentence should be added at the end of the paragraph to include the cities of Del Rey Oaks and Monterey as proposed land use jurisdictions.

4

PAGE 1-7 PBC, EDC PROCESS LINE 7

A sentence should be added clarifying the fact that the cities of Del Rey Oaks and Monterey have proposed annexations approved as part of the Plan.

5

PAGE 1-15 LINE 2

The cities of Del Rey Oaks and Monterey should be added as Planning areas within Fort Ord consistent with the approved Reuse Plan.

6

PAGE 1-18 LINE 9

The cities of Del Rey Oaks and Monterey should be added as proposed Land Use Jurisdictions at Fort Ord.

7

PAGE 2-3 PARAGRAPHS 3-4

Lt. General James Moore (ret) should be referenced as the coordinator of the Fort Ord Task Force. Joseph Cavanaugh should be included as FORG coordinator.

8

PAGE 2-5 LINES 20 + 21

The cities of Del Rey Oaks and Monterey should be included as local land use agencies.

9

PAGE 3-1 LINE 16

The cities of Del Rey Oaks and Monterey should be included as proposed Planning Areas and Districts.

10

PAGE 3-2 LINE 14

Fort Ord was included in the 1991 round of base closures.

11

PAGE 3-41 LINE 12

This sentence and the Table (3.3-1) should be corrected to include the proposed annexation areas for the cities of Del Rey Oaks and Monterey.

12

PAGE 3-45

This map (3.3-1) is not correct in depicting the approved land uses in the southwest area. Specifically, polygons 31a and 31b have not been properly labeled or identified.

13

PAGE 3-49 LINE 26

The Table referenced (3.42) should also include the proposed annexation areas of the cities of Del Rey Oaks and Monterey.

14

PAGE 3-53

This Table should add the cities of Del Rey Oaks and Monterey in the summary by Jurisdiction as proposed annexation areas.

15

PAGE 3-56 LINE 16

This sentence should be corrected to read "South Boundary Road" and the words "where visitor serving uses will also be considered" added at the end of the sentence.

16

PAGE 3-62 DEL REY OAKS SECTION SECOND SENTENCE

This sentence should read as follows: The current Caltrans proposal to realign State Highway 68 will not impact the commercial properties within the City of Del Rey Oaks at the intersection of Canyon Del Rey Road. The next three sentences should be deleted.

17

PAGE 3-65 FIGURE 3.5-1

The proposed 2015 Transportation Network Map should include the South Boundary Road connection to York Road and the configuration of North South Road (2 or 4 lanes) between Highway 218 and South Boundary Road should be clarified.

18

PAGE 3- 80 LINE 9

The word west is not correct. This area is east of the Main Garrison area.

19

PAGE 3-89 LINE 36

The sentence should be changed to add the phrase "planned for annexation to the City of Del Rey Oaks" after the word adjacent.

20

PAGE 3-129 LINE 3

#4 should be revised to read South Gate Planning Area in conjunction with the city of Del Rey Oaks and #5 should be revised to read York Road Planning Area in conjunction with the City of Monterey.

21

PAGE 3-130 TABLE 3.10.1

This Table should be revised to include the City of Del Rey Oaks as the proposed land use jurisdiction for the South Gate Area and the City of Monterey as the proposed land use jurisdiction for the York Road Area.

22

PAGE 3-131 FIGURE 3.10-1

This Figure should be revised to include Del Rey Oaks in the South Gate Planning Area and Monterey in the York Road Planning Area.

23

PAGE 3-141 SECTION 3.10.5

This section should reference the City of Del Rey Oaks as the proposed land use jurisdiction. The last sentence should add the following at the end, "and has been designated an 'Opportunity Zone' for development".

24

PAGE 3-143 PROJECTED LAND USES

The open space land uses should be projected as 15 acres not 22 acres.

25

END OF COMMENTS ON VOLUME ONE

(2) - 5

VOLUME TWO REUSE PLAN ELEMENTS

26

PAGE 4-15 CITY OF DEL REY OAKS

The following sentence should be added at the end of the paragraph: "The city of Del Rey Oaks sent a letter to LAFCO formally requesting annexation of this area of Fort Ord in January of 1993".

PAGE 4-16 LINES 17 & 27

Both should reference the cities of Del Rey Oaks and Monterey as proposed land use jurisdictions.

27

PAGE 4-17 FIGURE 4.1-4 DRAFT SPHERE OF INFLUENCE AND ANNEXATION REQUESTS

The plan should reflect the current status of city requests for annexations at Fort Ord which are not in conflict in the South Gate planning area.

28

PAGE 4-24 FIGURE 4.1-7 COUNTY OF MONTEREY LAND USE CONCEPT

This figure is not correct in that the South West Area polygons 31a and 31b have not been labeled or depicted accurately. The cities of Del Rey Oaks and Monterey should be included as proposed land use agencies.

29

PAGE 4-39 COUNTY OF MONTEREY

This section should explain at the outset that the cities of Del Rey Oaks and Monterey are proposed land use agencies for the South Gate and York Road Planning Areas.

30

PAGE 4-46 LIGHT INDUSTRIAL/ BUSINESS PARK, OFFICE/R&D

The cities of Del Rey Oaks and Monterey should be included as proposed land use agencies in both of these sections.

31

PAGE 4-46 RETAIL AND SERVICE CENTERS

A fourth bullet should be added to this section to include the South Gate Area's neighborhood retail uses.

32

PAGE 4-56 BUSINESS PARK/ LIGHT INDUSTRIAL, OFFICE/R&D

Both of these areas should include the South Gate Planning Area.

33

PAGE 4-57 CONVENIENCE/ SPECIALITY RETAIL

The South Gate area should be included in this section.

34

PAGE 4-57 VISITOR-SERVING HOTEL\GOLF COURSE DISTRICT

This section should include the City of Del Rey Oaks as the proposed land use jurisdiction.

35

PAGE 4-58 PROGRAM D-1.2

This section appears to be in the wrong place.

36

PAGE 4-61 LINE 2

The word club house should be plural

37

PAGE 4-94 NORTH SOUTH ROAD

The Broadway gate is currently opened to traffic.

38

PAGE 4-98 FIGURE 4.2-2 PROPOSED 2015 TRANSPORTATION NETWORK

The connection of South Boundary to York road should be included.

39

PAGE 4-115 FIGURE 4.2-6 PROPOSED BICYCLE NETWORK

A bike trail should be shown on South Boundary road from North South to York road.

40

PAGE 4-157 SOIL CONSERVATION POLICIES

It appears that the City of Seaside has been left out of this section.

41

PAGE 4-160 LINES 7&8

The safe yield for the Seaside basin has not been determined.

42

PAGE 4-201 PROGRAM A-8.1

There are a number of different methods available to protect the ephemeral drainage into the Frog Pond. Best management practices will be employed to preserve the quality of the habitat in the Frog Pond Natural Area.

43

PAGE 4-206 BIOLOGICAL RESOURCES POLICIES

The city of Seaside appears to have been left out of this section.

44

PAGE 4-221 CULTURAL RESOURCE POLICY A-2

This policy is mislabeled city of Marina. It should be Monterey County.

45

END OF COMMENTS ON VOLUME 2

COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT

46

FOLLOWING PAGE 3-4 FIGURE 3.2-1

Polygons 31a and 31b have been incorrectly drawn . The NAE area appears to be too large and the polygon border and label are inaccurate.

PAGE 3-9 LINE 26

The cities of Del Rey Oaks and Monterey should be added as proposed land use jurisdictions.

47

PAGE 3-10 SECTION 3.6.3 CITY OF DEL REY OAKS

A sentence should be added indicating that the city made a formal request to LAFCO to annex these properties in January of 1993.

48

FOLLOWING PAGE 3-10 FIGURE 3.6-1

This figure should be corrected to reflect the current status of requests to LAFCO which will show no jurisdictional conflicts with the cities of Monterey and Seaside.

49

PAGE 3-11 SECTION 3.7.3

The cities of Del Rey Oaks and Monterey should be included as proposed land use agencies.

50

PAGE 4-9 LINE 4

Polygon 31a should be approximately 15 acres not 22 as written. It should also be noted that this polygon is proposed to be under the land use jurisdiction of the city of Del Rey Oaks that will not allow noise, visible activity, or air pollution to adversely affect recreational activities in the NAE.

51

PAGE 4-38 WATER SUPPLY LINE 8

The Seaside groundwater basin supplies other uses in addition to the Fort Ord Golf Courses. These include the City of Seaside's municipal system and CalAm wells, including the Peralta well.

52

PAGE 4-49 LAND USE AND CONSERVATION ELEMENT

It should be noted that the city of Del Rey Oaks will be the responsible agency for implementation of these policies and programs to protect the Frog Pond. Program A-8.1 shall be implemented by the city utilizing best management practices to protect the ephemeral drainage that feeds into the Frog Pond.

53

FOLLOWING PAGE 4-78 FIGURE 4.7-2

The proposed 2015 Transportation Network should include the South Boundary Road connecting to York Road.

54

PAGE 4-134 BIOLOGICAL RESOURCES POLICY A-8

It should be noted that the City of Del Rey Oaks is the proposed land use jurisdiction and will have responsibility to insure that proposed development maintains the quality of the habitat in the Frog Pond Natural Area.

55

PAGE 4-135 LINE 2

Polygon 31a is designed to be an extension of the existing Frog Pond Area. as such it should not be designed to have barriers which will preclude public use.

56

PAGE 4-141 PROGRAM B-3.1

It should be noted that the City of Del Rey Oaks as the proposed land use jurisdiction for the Frog Pond Natural Area Expansion will be responsible to insure that proposed development will not adversely affect the flow to or water quality discharge into the Frog Pond.

57

PAGE A-28 FIGURE 3.3-1 DRAFT LAND USE CONCEPT

This map is indecipherable in black and white. A properly colored map must be included to enable intelligent analysis.

58

END OF COMMENTS ON DRAFT ENVIRONMENTAL IMPACT REPORT

VOLUME 4: SECTION 1 COMPREHENSIVE BUSINESS PLAN

59

GENERAL COMMENTS:

The Business Plan has not been thoroughly integrated into the overall Reuse Plan and DEIR. There are questions that remain concerning financing of infrastructure costs, phasing of development, cost recovery from land sales, the role of FORA, and proposed annexations of Fort Ord lands by adjacent cities including Del Rey Oaks, Monterey, Seaside, and Marina. The maps, ↓

charts, figures, exhibits and tables must be revised to reflect the existing FORA policies as they pertain to development in areas proposed for annexation.

59

PAGE 1-6 EXHIBIT 1 & 1a

The cities of Del Rey Oaks and Monterey should be included as proposed local governments which will have responsibility for municipal and public service functions.

60

PAGE 11-4 LINE 10

RKG Associates is the correct name.

61

PAGE 11-6 EXHIBIT 3

This Exhibit which deals with absorption potential should include a golf course in the 1996-2000 planning horizon. This is particularly important to be consistent with other parts of the report which include the need to link new hotel development to golf courses which have preferred access tee time allocations for guests (see page 11-12 line 18).

62

PAGE 11-18 EXHIBIT 4

The costs in this Exhibit need to include the phasing of Capital Improvements more closely linked to proposed development scenarios.

63

PAGE 11-19 EXHIBIT 5

The total burden of development costs outlined in this Exhibit could make future development at Fort Ord financially questionable. What is the financial role and responsibility of the major educational institutions located at Fort Ord? What happens to these costs if their proposed contributions are not included?

64

PAGE 111-2 COMMUNITY BUILDING STRATEGY

A new number 9 should be added as follows: integrate new visitor serving uses at Fort Ord into the overall tourism strategy for the Monterey Peninsula.

65

PAGE 111-6 C. EARLY SITES MARKETING ACTION PLAN

This section should reference the "opportunity zone" concept in the South Gate planning area which has early action potential because of its ability to "plug into" existing infrastructure, provide a streamlined "small city" planning environment, and offer other developer incentives based on its location, access, and the City of Del Rey Oaks' responsive approach.

66

PAGE 11-7 EXHIBIT 6 SUMMARY OF EARLY SITES MARKETING PLAN

A new number 15 should be added including the Del Rey Oaks Conference Center, Hotel and Golf Course within the next 3-4 years.

67

PAGE 11-16 6. HOTEL SITE

The Del Rey Oaks proposed site should be included in this section.

68

PAGE 11-17 7. GOLF COURSE SITES

The Del Rey Oaks proposed project should be included in this section.

69

PAGE 1V-2 FIGURE 3.3-1 DRAFT LAND USE CONCEPT

This figure is inaccurate in its depiction and labeling of polygons 31a and 31b.

70

PAGE 1V-4 EXHIBIT 8 SUMMARY OF LAND USE CONCEPT

This exhibit should include the cities of Del Rey Oaks and Monterey as proposed land use agencies.

71

PAGE 1V-18 SUMMARY OF FINANCIAL RESULTS -- FORA OPERATIONS

This section and Exhibit 10 which it describes are not consistent. The replacement copy distributed by FORA reconciles the text and exhibit, however the basic assumption that FORA will realize \$46,000,000 from land sales and over \$10,000,000 in federal and state grants in the 20 year period should be reexamined, and alternatives presented.

72

PAGE 1V -18 MUNICIPAL SERVICE COSTS

If FORA does not receive the revenues mentioned in the previous section, the operating deficits for the municipalities and the county could become a financial issue without a solution. The business plan must review and suggest alternative solutions to this potentially critical problem.

73

PAGE 1V-23 5. MAJOR ASSUMPTIONS

Demolition costs of \$120,000,000 seem to be unrealistically high. Alternatives should be explored for lower costs and more environmentally sound solutions.

74

PAGE 1V-26 7. FINANCIAL PROJECTIONS LINE 6

The net positive cash flow of \$69 million is not consistent with new page 1V-18. Line 19 contains the same not corrected numbers.

75

PAGE IV-27 EXHIBIT 13

The land sales figure of \$260,700,000 may not be realistic if other assumptions including provision of infrastructure and entitlements do not materialize.

76

PAGE V-1 LINE 12

The \$49 million positive cash flow is not consistent with previous numbers quoted in preceding tables.

77

PAGE V-3 KEY BUSINESS STRATEGIES #1

A program for sharing revenues and costs among affected local governments has not been approved. The strategy referenced has not been formulated or discussed by the FORA board.

78

PAGE V-4 LINE 14

The cities of Del Rey Oaks and Monterey should be included as proposed land recipients.

79

PAGE V-4 LINE 19

There are "five" not "three" proposed principal local jurisdictions when the cities of Del Rey Oaks and Monterey are added.

80

END OF COMMENTS ON THE COMPREHENSIVE BUSINESS PLAN

COMMENTS ON THE PUBLIC FACILITIES IMPLEMENTATION PLAN (PFIP)

81

GENERAL COMMENTS

The PFIP is one component of the Operations Plan which also includes the Public Services Plan. These two documents should be integrated at the Executive Summary level to insure the consistency of financial approaches and the resultant implications for FORA and local governments that will assume land use jurisdiction at the completion of the EDC by the Army.

PFIP 1-3 LINE 3

It should be clarified that the "southwest" service area is referred to in other volumes as the "Southgate Planning Area".

82

PFIP 1-5 LINE 21

The "key informants" should be identified, at least by agency name and position.

83

PFIP 1-130 & 1-132 NORTH SOUTH ROAD IMPROVEMENTS

North South Road improvement descriptions refer to 2 and 4 lane segment up grades in each table. The phasing and financing of these proposed upgrades must be clarified.

84

PFIP 1-50 PHASED TRANSPORTATION SYSTEM TO THE YEAR 2015

The figure identifies North South Road as 4 lanes to South Boundary Road and 2 lanes to the Broadway Gate. Is this consistent with the language in PFIP 1-130 & 1-132 cited above.

85

PFIP 2-4 SET ONE LAND USE DISTRIBUTION

The proposed annexation areas for the cities of Del Rey Oaks and Monterey should be identified and enumerated.

86

PFIP 2-8 SET 2 WASTEWATER

This table may be in need of adjustment if the City of Del Rey Oaks utilizes reclaimed water on site, rather than utilizing the capacity of the MRWPCA plant in Marina.

87

PFIP 2-20 SET 3 WASTEWATER SCREEN

This table should be adjusted based on PFIP 2-8 above.

88

PFIP 2-23 SET 3 SUMMARY COST SCREEN FOR ALL CAPITAL IMPROVEMENTS

The total costs for infrastructure improvements is in the range of \$200,000 per developable acre. This will present financial challenges for developers as this per acre cost is significantly higher than current land values can support.

89

PFIP 3-59 TABLE PFIP 3-12

This table has correctly identified the correct acerages for polygon 31a NAE (15 acres) and 31b OP (17.7 acres).

90

PFIP 4-6 TABLE PFIP 4-1 SUMMARY OF THE BURDEN OF FINANCING PUBLIC IMPROVEMENTS

The total costs of public improvements in this table are not consistent with the costs identified in PFIP 2-23 above.

91

PFIP 5-1 PUBLIC FACILITIES FINANCING PLAN LINE 11

The total of \$187,118,000 does not agree with TABLE PFIP 3-7 that shows a total of \$189,328,000.

92

THIS CONCLUDES COMMENTS ON THE PFIP

VOLUME 4 SECTION 3 : PUBLIC SERVICES PLAN
GENERAL COMMENTS

93

This whole section needs to be rewritten to include information about the proposed annexations by the cities of Del Rey Oaks and Monterey and to more accurately reflect actual costs with a realistic methodology explaining how costs and revenues will be allocated and paid.

This is particularly important in the treatment of how local governments will pay for services required as the former base is converted to community uses. The costs of infrastructure must realistically be included in the total cost with financing mechanisms discussed and analyzed for local decision makers. Reliance on projected revenues from the sale of land must be more closely studied before local governments could determine that local government costs will be totally satisfied from this revenue source.

94

PSP-1 LINE 8 INTRODUCTION

The analysis should include the proposed annexations by the cities of Del Rey Oaks and Monterey. The provision of public services in these areas by the cities rather than Monterey County will have an important impact on all of the affected local jurisdictions.

95

PSP-1 SUMMARY OF CONCLUSIONS

The cities of Del Rey Oaks and Monterey must be included in the determination of the costs and revenues that are represented in the PSP.

96

PSP-1 CONCLUSIONS

The net fiscal impact on the cities of Del Rey Oaks and Monterey must be included.

97

PSP-3 TABLE 1-1 SUMMARY OF FISCAL IMPACTS

The cities of Del Rey Oaks and Monterey should be included in this table. There should be a breakdown of the sources of revenue per year.

98

PSP-4 FIGURE 1-1 SUMMARY OF FISCAL IMPACTS

The cities of Del Rey Oaks and Monterey should be included in this figure.

99

PSP-5 LINE 26 ORGANIZATIONAL ASSUMPTIONS

The following sentence should be added at the end of the paragraph: Annexations of land in the unincorporated area of Monterey County within the former Fort Ord by the cities of Del Rey Oaks, Monterey, Seaside and Marina will influence these plans and financial projections.

100

PSP-6&7 TABLE 2-1 SUMMARY OF ORGANIZATIONAL ASSUMPTIONS
The cities of Del Rey Oaks and Monterey must be included in this table for proposed annexation areas at Fort Ord.

101

PSP-8 JURISDICTIONAL ASSUMPTIONS
Assuming the status quo about municipal boundaries is not consistent with the intent of the FORA Reuse Plan. The cities of Del Rey Oaks and Monterey have proposed annexation areas acknowledged in the Plan.

102

PSP-9 LINE 6 MUNICIPAL SERVICES
The cities of Del Rey Oaks and Monterey will provide services within their proposed annexation areas.

103

PSP-9 FIRE PROTECTION
The cities of Del Rey Oaks and Monterey will provide fire protection services for their proposed annexation areas.

104

PSP-9 HABITAT MANAGEMENT
If a joint powers agreement is formed it should include the cities of Del Rey Oaks and Monterey.

105

PSP-10 CAPITAL IMPROVEMENTS PLANNING
This section should include the cities of Del Rey Oaks and Monterey.

106

PSP-14 DETAILED STAFFING PLANS
This section should include the cities of Del Rey Oaks and Monterey.

107

PSP-25 TABLE 3-6 COUNTY OF MONTEREY REVENUE FORECAST
This table should include the cities of Del Rey Oaks and Monterey. In addition , the table is illegible in places.

108

PSP-27 TABLE 3-8 MARKET VALUE AND TURNOVER RATE ASSUMPTIONS
The assumptions in this table, including the inflation rate of 4% should be reviewed and alternative scenarios included.

109

PSP-30 PROPERTY TAX APPORTIONMENT FACTORS
The assumption that Salinas Rural Fire District will supply service to all of the unincorporated

110

areas at Fort Ord is not correct for the proposed annexation areas of Del Rey Oaks and the City of Monterey.

110

PSP-35 TRANSIENT OCCUPANCY TAX

111

The assumptions in this section are not accurate for the City of Del Rey Oaks which has a TOT of 10% and potential for inclusion of some form of TOT for timeshare occupancy.

PSP-53 TABLE 4-8 SUMMARY OF AV BY PLANNING AREA

112

The assumptions for the proposed Del Rey Oaks project are not correct and need to be revised and clarified.

END OF COMMENTS ON VOLUME 4.

ccs:
Mayor
City Manager

**MINUTES
OF
SPECIAL PACIFIC GROVE CITY COUNCIL MEETING
STUDY SESSION REGARDING FORT ORD REUSE PLAN
AND
DRAFT ENVIRONMENTAL IMPACT REPORT**

Wednesday, July 31, 1996

7:00 p.m.

Pacific Grove Community Center
515 Junipero Avenue

1. **CALL TO ORDER:** All members of the Pacific Grove City Council were present with the exception of Council Member Honegger.

Staff present: City Attorney Thacher; Community Development Director Lobay; Chief Planner MacClelland; City Manager Huse

FORA staff present: Executive Officer Les White; Ann Hebenstreit; consultant Candace Ingram

2. **PUBLIC COMMENT:** None

3. **OVERVIEW OF PROPOSED FORT ORD REUSE PLAN:** City Manager Huse made introductory remarks regarding the purpose of the workshop and the CEQA process. He emphasized that the meeting was designed to induce questions about the Fort Ord Reuse Plan and Draft Environmental Impact Report (DEIR). Those in attendance who had questions were encouraged to transmit them in writing to FORA for response and inclusion in the final EIR document.

FORA staff member Ann Hebenstreit gave a presentation regarding the history of FORA and the Reuse Plan. She stated that a tentative date of August 22, 1996, has been set for a public hearing and that the date might be extended to August 29, 1996. She emphasized that FORA will pay its share of regional improvement costs.

Executive Officer Les White summarized the presentation by listing a number of benefits and opportunities provided by the Reuse Plan. He commented that the Reuse Plan proposes a redevelopment of the former Fort Ord rather than outlining new growth and development. He touched on the fact that there is 6,600 acre feet of water on Fort Ord available for the Reuse Plan and that funding sources for transportation

Go to next page

improvements have not been identified. He also stated that the lack of adequate transportation would limit growth.

The City Council asked a series of questions of Mr. White and other FORA personnel.

61 Council Member Yadon stated that public transit is very important to the future success of any reuse plan and asked how this necessary service was being addressed. Mr. White, in response, commented on the multi-modal facility and the fact that the FORA Board of Directors and FORA staff support MST and their efforts. Ms. Ebenstreit explained the land transfer process and the Public Benefit Conveyance procedure.

62 Council Member Zito expressed concern about the Plan's assumptions, especially the one that says the Army will not be paid for the land. What has been the experience in other base closure/reuse efforts. Mr. White explained there would be a deferred payment plan for the land and cited the example of Norton Air Force Base where there was a "balloon" payment required after a period of time.

Mr. Zito also questioned the "redevelopment" statement made by Mr. White. There is an intensification of development when compared to what was the case prior to closure of the base. The Plan seems to go far beyond replacement of Fort Ord impact. Mr. White acknowledged that densities were higher and that the ramifications of that fact are subject to question and comment through the Plan/DEIR review process. He stated that the City of Seaside's perspective on the Plan would be different from that of Pacific Grove.

63 Council Member Huitt asked whether the prospective transportation budget of \$137 million was for on base improvements. Mr. White responded that the estimate included off base improvements as well. He also stated of a hope that there will be a regional mechanism to fund improvements. Lacking that, the individual land use jurisdictions could finance the improvements.

Mr. Huitt asked if the impacts of Proposition 218, which appears on the November, 1996 ballot, have been weighed. Executive Officer White acknowledged that was a good question and stated that no review had been done, yet.

Mr. Huitt also asked that if the outcome of public comment resulted in a different plan, would that produce an unbalanced budget. Mr. White stated that question was difficult to answer and that it depended on the number and types of changes.

64 Mayor Pro Tem Davis asked if costs contained in the Plan were firmer than the income/revenue estimates. Mr. White responded by saying the that the consultant's calculations are "fairly solid." The most tenuous figure relating to cost is the one for demolition. While, the most tentative on the revenue side is related to transportation.

64

Mr. Davis asked if the Plan would be killed if the Army required payment for the land. Mr. White responded, "Not necessarily."

2

Mr. Davis asked what agency is responsible for assuring that water will be available to service the Reuse Plan. Executive Officer White stated that the Water Resources Agency (Monterey County) is the responsible authority. Mr. White also commented that there is not enough water to go past the year 2015 in terms of serving redevelopment activities.

3

Mr. Davis posed the following question to Mr. White. "If the development (Reuse Plan) was yours, would you invest?" Mr. White answered that the residential uses would be good investment, while the industrial uses will need some help.

There being no further questions from Council, Mayor Koffman called for public questions.

65

Eleanor Rogge: Who is going to manage the Plan to make sure things are "balancing?"

11

Les White: Good question. That has yet to be determined; FORA could be the vehicle or individual agencies could be responsible. Development in the County area of Fort Ord is 5-10 years from real activity.

66

Bud Nunn: Where are funds coming from to enable FORA to pay for its fair share of regional transportation costs?

11

Les White: Development impact fees.

Bud Nunn: Is financial information available for public to review?

12

Les White: Yes, it is available.

Bud Nunn: Who is responsible for Mello-Roos financing plan?

13

Les White: Developers would be responsible for retiring debt incurred under a Mello-Roos financing plan.

Bud Nunn: How realistic is Plan adoption schedule (adoption date in October, 1996)?

14

Les White: It would take an "ideal" situation in order to meet October adoption schedule. Additional public hearings could be held and there could be further review.

64, 65, 66

67 David Dilworth: Where is the impact that was suffered when Fort Ord closed? 1

Les White: The economic impact was not as great as predicted.

David Dilworth: Where is public sentiment factored? 2

Les White: The sentiment is measured at meetings such as this one and is taken from comments such as yours. The original plan was developed by a Peninsula-wide committee.

David Dilworth: What are the alternatives to the Plan? 3

Les White: There is no project alternative or "fraction of a project" option.

David Dilworth: Are economic analysis assumptions in DEIR or Reuse Plan? 4

Les White: They are in the Business Plan.

David Dilworth: What would it take to reduce the scope of the Plan by one-half or two-thirds? 5

Les White: It would take a vote of the FORA Board of Directors.

David Dilworth: What has happened at Hamilton Air Force Base? 6

Les White: Not sure.

68 Debra Nicholson: Open space area includes unexploded ordinance and couldn't be used for any public purpose, is that correct? 1

Les White: The majority of property (open space) will be accessible.

Debra Nicholson: The design standards for development will be developed at some time, will there be height restrictions? 2

Les White: That is a valid issue which will be addressed by the FORA Board.

Debra Nicholson: There is no project alternative to a plan that creates a city of 35,000 and uses 9,000 acre feet of water. There is 6,600 acre feet of water on site and full pumping could cause salt water intrusion, how much water is being used? 3

Les White: I have figure from Army.

69 Karen Morgan: Questioned emphasis of presentation. If there are no solutions to long range plan, why go forward? | 1

Les White: I represent a variety of interests and those interests have determined that this the plan which shall be subject to public review and comment, at this time.

70 Connie Perry: Where is UCSC? What about the cemetery proposal? Why did Army give land at no cost and spend \$500 million to clean it up? | 1, 2, 3

Les White: The UCSC property is titled mixed use on the land use map. In regard to the cemetery proposal, it would compete with the national cemetery located at Santa Nella. With respect to the Army cleaning up the property, it is their responsibility as they caused it.

71 David Dilworth: Where will the proceeds from the sale of land go? | 1

Les White: The revenue will fund public infrastructure improvements.

This completed the public comment/question portion of the meeting.

4. CONSIDER REVIEW SCHEDULE OF FORT ORD REUSE PLAN AND DRAFT ENVIRONMENTAL IMPACT REPORT

City Manager Huse reported that future consideration of the Reuse Plan and DEIR will be contingent upon action by the FORA Board of Directors. If an extension of the review period is approved by the Board, then the final comment scoping meeting of the Pacific Grove Council will be October 2, 1996.

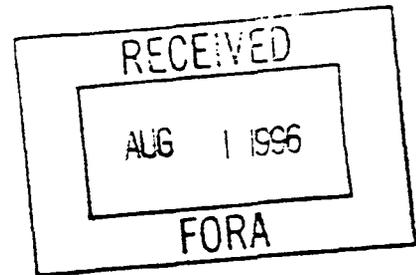
5. ADJOURNMENT

There being no further business the meeting was adjourned at 9:00 p.m. by Mayor Koffman.

Respectfully submitted,


Michael W. Huse
City Manager

July 31, 1996



Fort Ord Reuse Authority
100 12th Street, Bldg. 2880
Marina, CA 93933

Dear FORA:

I am concerned about preserving the quality of life in Monterey County that is disappearing so quickly.

The over-development of the area so far has already had huge negative impacts. Traffic congestion and dangerous driving conditions, over-demand on our water supply, pollution, loss of open land and wildlife are just a few of the obvious.

A plan for Fort Ord that would allow 71,000 people is way out of line for this area. I appreciate the need to consider our economy as a result of the military's leaving; but, surely, a plan that allows for a more reasonable number of people (say, the same as the military population) would do the job and lessen the damage to our environment.

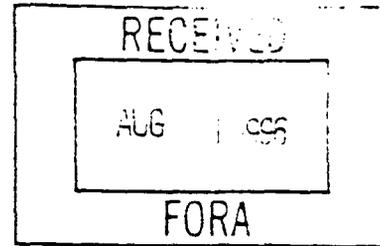
Please think of the total picture and of the future of our environment and residents.

Sincerely,

Janet Rawitzer

Janet Rawitzer
17724 Riverbend Road
Salinas, CA 93908

July 31, 1996



Fort Ord Reuse Authority
100 12th Street, Bldg. 2880
Marina, CA 93933

Dear FORA:

Your plans for Fort Ord go too far--making the area like another San Jose.

How can you increase the area's population so dramatically? Your growth plans at Fort Ord would allow far too many people. Current plans for 71,000 population would destroy the quality of life for the rest of us in the county. 30,000 is more reasonable.

Traffic is another concern. We already live with gridlock during rush hours on Highway 68. New developments such as Monterra Ranch and Bishop Ranch and Las Palmas already cause significant impacts to Highway 68. The Fort Ord plans for massive development will additionally destroy traffic flow along 68 and over-burden Highway 1, Reservation Road, etc. Emptying any of the former base's traffic onto Highway 68 through York Road, for instance, would be disastrous to those who live along the Highway 68 corridor and others who commute the route.

Water is another over-riding concern we have. The Toro Area has been water poor forever. A major city next door can have nothing but negative impacts on our area. Part of our water passes into the Seaside aquifer.

Do you intend that residents now living in the area should suffer to allow massive new development for a new population?

Pollution due to increased traffic and industry has already begun to negatively impact our area. Massive development of Fort Ord will dramatically increase pollutants in the area.

Your plan calls for too many visitor-serving facilities at the expense of local needs and without the development of adequate infrastructure. Too many hotel rooms, golf courses and other tourist facilities are in your plan. Tourists take long showers, clog our road ways, leave their pollutants, and leave town.

6

Your plan does not take into consideration the needs of Monterey County residents, like ourselves, who see your Fort Ord Reuse Plan as part of the continuing degradation of the area.

7

You're so small a group, and yet so powerful. Your plan is heavily slanted toward development. What of the rest of us?

Sincerely,

Gordon A. Mayfield

Gordon A. Mayfield
Highway 68 Coalition
Toro Area Water/Traffic Committee
398 Corral de Tierra Road
Salinas, CA 93908

copies to: Simon Salinas
Judy Pennycook
Tom Perkins
Edith Johnsen
Sam Karas
Cal-Trans
Transportation Agency for Monterey County

DRAFT 10273

**CITY COUNCIL
CITY OF CARMEL-BY-THE-SEA
MINUTES OF MEETING**

**Special Meeting
Recorded Nos. 3001
and 3002**

**Thursday
August 1, 1996
3:00 P.M.**

I. Call To Order

The Special Meeting of the City Council of the City of Carmel-by-the-Sea, California, was held on the above date at the stated hour of 3:00 p.m. The Mayor called the meeting to order.

II. Roll Call

PRESENT:	COUNCIL MEMBERS:	Hazdovac Hydorn Livingston White
ABSENT:	COUNCIL MEMBERS:	Fischer
STAFF PRESENT:	City Administrator City Clerk Director of Community Planning and Building	Kersnar Brehmer Roseth

II. Pledge of Allegiance

The Pledge of Allegiance was led by Council Member Hydorn.

III. Orders of Council

A. RECEIVE REPORTS, TAKE PUBLIC COMMENTS, AND PROVIDE COUNCIL COMMENTS ON THE FORT ORD REUSE PLAN/EIR

Mayor White introduced Les White, Executive Director of FORA, who then introduced Ann Hebenstreit, member of the FORA planning staff, who gave a brief overview of the Fort Ord Reuse Plan.

During her presentation, she noted that the goals of FORA were twofold: 1) to create a Reuse Plan; and 2) to facilitate the transfer of the Fort Ord property to civilian use. The Plan, she explained, is a refinement of the Plan that was drafted by the Task Forces formed by then-Congressman Leon

Go to next page

City Council
Special Meeting
August 1, 1996

10276

In addressing build-out, he explained that most growth that is going to happen on the Peninsula is going to happen on Fort Ord, and that would be a modest growth rate of 1 percent per year. In conclusion, he said: 1) redevelopment/development presents an enormous opportunity for the region; 2) the proposal presents an opportunity to develop a world-class university town; 3) the kind of development and the emphasis in the Plan are a complement to the Peninsula; 4) the Plan will be opposed; and 5) the Plan should be developed, made the best it can be, and adopted.

Prior to opening the discussion to members of the audience, Mayor White asked if the desire of the Council was to have a verbatim transcript of the meeting. BY CONSENSUS, THE COUNCIL DID NOT WISH TO HAVE A VERBATIM TRANSCRIPT OF THE MEETING.

Mayor White opened the discussion to members of the audience.

74 Melanie Moran appeared to invite the members of the Council and audience to the Hopkins Marine Station in October to view the coastline fronting Fort Ord -- noting the difference between a Monterey Bay hotel and the Embassy Suites. She also supported Council Member Hydorn's comments regarding design guidelines. | 1

75 Mary Condry, representing the Carmel Residents Association, appeared to address concerns regarding the adequacy of the EIR and to urge the Council to request that the deadline for certification of the DEIR be extended until the end of the year. She also addressed concerns regarding water consumption, waste water treatment capacity, and the impact on the highways. She said the Association believed the DEIR should address mitigating measures as well as a project alternative in which development would be restricted to that which can be accommodated by the water available on the Fort Ord site. | 1
2

76 Laurence Dickey appeared to state that the Plan should be down-sized. He said the issues of water availability and economic viability are reasons to "cut back the latest proposal," and made the following comments for the record: "The present allocation of 6600 acre-feet of water is being drawn from the Seaside aquifer which is already critically low, and there is no assurance that additional supplies will be manufactured, recovered, reprocessed or transported within ten years. There is no money on hand or budgeted for the required improvements to project sites before entrepreneurs will buy them and pay user fees. It is apparent that the draft Environmental Impact Report and Reuse Plan, which have taken so much time and money, require huge reductions to be in keeping with the needs and capabilities of this out-of-the-way agricultural and recreational peninsula." In closing he asked the Council to instruct the FORA representative to seek a five-month extension of time for a ✓ | 1
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74, 75, 76

City Council
Special Meeting
August 1, 1996

10277

76 study of the report and Plan by FORA, affected agencies, and the general public to produce a "realistic and common-sense plan which can surely be supported by a revised draft Environmental Impact Report." 2

Shirley Humann appeared to state that the Fort Ord DEIR does not disclose the full impact of the project and should be based on safe-yield of site-water. She asked that staff and the Council be informed on the major impacts of the DEIR and recommend an extension of time to review the DEIR. see # 80

77 Linda Anderson appeared to express the importance of the document and to note that "since the DEIR is so long, complicated and expensive, and the public at this point is virtually unaware of the enormity of the proposed plan... to rush through to an August 30 deadline for comments is not the fair or right thing to do." She then urged the Council to ask for an extension of the comment period to December 13. Continuing, she said the Plan will: 1) increase the population on the Peninsula by 57 percent; 2) add 1800 new motel rooms and five golf courses; 3) require as much new water as the whole Peninsula now uses; 4) severely tax our infrastructure; 5) develop twice the amount of acreage used by Army; 6) require the widening of roads and a Hatton Canyon Freeway; and 7) use all of the waste water capacity. The DEIR, she explained, does not give specific solutions or mitigations to the impacts. She closed by saying that "Once these elements are built into an adopted plan, it will be far harder, if not impossible, to modify them." 1 2

Mark Christensen appeared to say that the Plan was a long way from being a good one. He concurred with the previous speakers that the Plan will have an enormous impact on the Peninsula for generations to come and urged the Council to ask that the review process be extended. He also noted for the record: 1) there needs to be an analysis of off-site impacts and of the financing; and 2) the availability of water. see # 81

78 Clayton Anderson appeared to echo comments of previous speakers requesting an extension of the public comment period on the DEIR. 1

79 Peggy Jorgensen appeared to suggest that one of the reasons behind the time frame to respond to the EIR is a financial one. 1

Debra Mickelson appeared to read into the record the following letter: "The Draft Environmental Impact Report (DEIR) for the Fort Ord Reuse Plan contains numerous flaws. One is so serious that a Revised Draft EIR is legally required in order to comply with the California Environmental Quality Act. The DEIR fails to provide a project 'alternative 3' designed to reduce the significant impacts of increased water use, traffic, and wastewater. In February, the City of Salinas, a FORA member, requested a project alternative constrained by safe use of on-site water resources. Even though the request was reasonable and CEQA requires the selection and discussion of alternatives that foster informed decision-making, curiously, this sensible alternative is not before FORA today. Certification of the EIR happens only when we get a Final EIR ... and the adoption of the 'current preferred

76, 77, 78, 79

City Council
Special Meeting
August 1, 1996

10278

project triggers land transfers to the cities and county. The land can then be sold to private parties. This creates the developer's constitutional right to develop the land to its highest and best use. It becomes a 'land trap' destined to become the 72,000-person city. This DEIR doesn't adequately describe the enormous environmental consequences of building huge new water systems, and new 4 and 6 land roadways. It doesn't even provide an on-site location for a wastewater treatment plant. Neither does it tell us who pays for all this. The solution is to prepare a project alternative that allows land to be used and sold so that the on-site, safe-yield water is not exceeded by the long-term water reuse of the base. This would lessen other adverse impacts as well." *see #82*

Louis Ungaretti appeared to say that he had been out of the country and that he will be submitting a letter to the City expressing his concerns with the DEIR.

Bernard Finley appeared to announce that he was asked to coordinate the car pool to the County Office of Education on August 7, 1997, for those persons wishing to attend the Special FORA meeting. He left a sign-up sheet for Council and the audience.

With no further appearances to come before the City Council, Mayor White closed the public discussion.

The City Administrator addressed questions of the audience and reviewed the time frame for adoption of the Plan/DEIR.

Following discussion, BY CONSENSUS, THE COUNCIL APPROVED THE SENDING OF A LETTER TO THE FORA BOARD ASKING THAT THE PERIOD FOR PUBLIC COMMENTS BE EXTENDED TO DECEMBER 15, 1996, AND DIRECTING THAT A COPY OF THE LETTER BE SENT TO CONGRESSMAN FARR AND STATE SENATORS.

Council Member Livingston stated that she was concerned that a program EIR was selected rather than a "staged" EIR. She explained that the program EIR was selected because it focuses on cumulative projects in the area. However, she pointed out that the EIR does not meet this criteria and, as such, may prove to be a significant legal defect. She asked that the Council take a position that the Plan should be based on available on-site, safe-yield water.

Council Member Hydorn asked if the letter should address a request for an Executive Summary of the DEIR and a suitable alternative in the Plan, noting that "unless the people have an easy-to-understand Executive Summary," the public will not be prepared to comment on the EIR.

Les White explained that there is an Executive Summary in the EIR and there would be an additional cost to prepare another Executive Summary.

go to next page

City Council of Carmel

August 1, 1996

Dear Mayor and Council,

This Fort Ord DEIR does not disclose the full impact of this large project and should be based on safe yield of site water.

I ask that our Staff and City Council inform themselves on the major impact of the DEIR and go forward with a recommendation for an extension of time to review until the end of the year.

I am attaching a brief draft of an overview of the Fort Ord DEIR for you to review. I feel you should take the time to do so since it shows that 2/3 of the 18,000 acre foot water need does not exist on-site.

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Sincerely,

Shirley Humann
Shirley Humann

FORT ORD DEIR OVERVIEW

as of 7/31/96

prepared by Debra Mickelson P.O. Box 7591 Carmel, CA 93921 624-8755

THE BASICS TO THE REUSE PLAN	(Exist on Peninsula Now)
72,000 people (includes CSU)	(127,000 people)
22,000+ DU (development units)	(44,000+ DU)[w/o Marina]
12 mil sq. ft. office park	?
2 mil sq. ft. retail	?
1,800 hotel rooms	(9,300 hotel rooms)
[total of 4,760 new rooms are in planning now throughout the area]	
5 new golf courses	(18 golf courses)

[total of 10 new golf courses are in planning now throughout the area]

needs 10,000+ acres for buildings
[Army used 5,000 acres]

BASIC TO CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA):

Good faith effort of full disclosure of impacts of the project.

BASIC PROCESS AT HAND:

FORA needs to certify an adequate final EIR. Then adopt a reuse plan.

This will then trigger the transfer/sale of land to the cities and county.

The land can then be sold to private parties.

THE PROBLEM:

The current FORA plan seems to "need" too much land and allow too much development. In other words, the DEIR's "preferred project" allows and encourages land sale to private developers for which:

*2/3 of the 18,000 acre foot water need does not exist on-site

no details or analysis about the new "water importation" and/or "desal plant are provided

*wastewater treatment capacity currently available at the Regional plant is exceeded by 3,000 AFY by this project; even with the planned expansion for the MRWPCA plant, the Ord plan would take over 90% of the capacity-this does not account for or allow for future needs of the 12 Regional users

*the off-site traffic improvements have no funding: e.g., 6-lane Hwy 1; 4-lane Hwy 218 (Canyon del Rey); Hwy 156 widened; new alignment for a 4-lane Hwy 68 [total on off-sites cost \$300 mil]

mention is made of "improving" Hwy 1 near Carmel

impacts and needed improvements for Hwy 101 are not identified

(Cal Trans wants, but has not received, an easement that could allow for the 4-laning of Hwy 68 in its current alignment)

(2)

FURTHER PROBLEM:

DEIR author uses "program EIR" format and states that this allows detailed study of the above problems and development of mitigation measures to be deferred until some time in the future (meanwhile the land is sold to private developers, which creates the "constitutional right to develop the land to its best and highest use")

DEIR author uses "policies and programs" to "solve" problems created by the project. PPs may not be legally enforceable. DEIR keeps legally enforceable mitigations measures to a minimum and seems to offer mitigation measures that are required anyway by State laws or local ordinances

DEIR authors reveal the true "project objectives" on page 2-6:

- *develop economic/employment recovery to compensate for base closure
- *and, "accommodate regional growth"

NEEDED: FORA members should provide 1989 and 1995 data for:

- general budgets
- sales tax
- # employed
- unemployment rate

it's suggested that data for one other town, e.g., Watsonville, should be included

Taken on its face, the FORA "creates" 45,000 jobs while approx 20,000 jobs were "lost" [military jobs cannot be equated with civilian jobs]

NEEDED: A definition of "regional" growth

- DEIR projects up to 2.61%/year growth
- AMBAG currently projects 0.9%/year
- our historic growth rate has been 0.5% per year

EMPHASIZE: The Panetta Task Force and/or SB 899 did not state "accommodating regional growth" as a reuse plan goal

The city of Salinas requested in February 1996 that the DEIR should include a project alternative that would restrict overall reuse of the base to on-site, safe-yield water. This was not done.

THIS PROJECT ALTERNATIVE MUST BE ANALYZED IN A REVISED DRAFT EIR.

basic796

August 1, 1996

To: Carmel City Council

From: Mark Christensen

Mark Christensen

2427 Franciscan Way

Carmel 93923

Re: FORA draft EIR

"preferred project"

1. This DEIR proposes an enormous development that will/would have huge impacts on the environment, economy, and politics of Monterey Peninsula for the next 100 years. Are you aware of the scope of those plans and impacts? The entire Peninsula will be vitally affected. The accelerated review period ends August 30. At the very least you must insist that the review period be extended for sufficient time for affected parties to become informed -- that is, at least 3 months, to November 30.
2. Should you be worried? What happens if FORA approves this DEIR?
 - a) next it adopts the reuse Plan --
 - b) adoption of the Plan triggers transfer/sale of land to cities and counties.
 - c) land is then sold to private parties who will then have "constitutional right to develop the land..." - i.e. property rights. This DEIR proposes 22,000+ development units, which will then have "rights" to water, roads, air, beaches, etc.
 - d) Revenues from land sales are used for development on FO. No funding for off-site improvements.

Christensen

2

3. The DEIR does not analyze impacts (it only describes a Plan)
- a. Water - 22,000' 04" = lots of record, claimants for water
 MPW District includes a large part of the area to be developed.
 How many new 'lots of record' will lie in MPW? What obligations?
 On-site water supply is estimated at 6000 af/y.
 Water demand is estimated at 18,000 af/y.
 Where will that new water come from?
 Who will pay for the development? What environmental impacts?
 DEIR provides no analysis -- problems arise for the future.
 The new lots will exist before that issue is settled if
 This DEIR is approved and the 'proposed project' is adopted
- b. Traffic - about 800 million dollars of off-site highway construction is proposed.
- huge, negative impacts on existing property owners are not analyzed
 -- funding is not discussed. If those funds are not provided by i) the State and/or ii) the County, then all existing parties will pay the collective price in congestion, decline of quality of life, probable decline in tourism - compare that to a much smaller scale
4. a) The review period for this DEIR must be extended to provide time for adequate review -- until November 30
- b) The Plan should be down-sized to the limit imposed by existing, reliable, on-site water resources. If water construction are done with realistic, all other problems become more tractable.

August 1, 1996

Verbal Presentation
3:00 pm Special Mtg.

Mayor Ken White and City Council
Carmel-by-the-Sea

Re: Fort Ord Reuse Plan DEIR

To Mayor White and City Council:

The attached letter, printed in the Monterey County Herald today, best summarizes my current concerns about the draft EIR for Fort Ord.

As a result of attending the FORA presentation to the Pacific Grove City Council last evening, and a meeting of concerned local residents this morning, I would like to suggest the following: actions need to be taken now to assure a continuation of the public comment period for the DEIR beyond the 30 August deadline.

We need to ask ourselves three important questions:

1) Have the decision makers, staff members, the 13 FORA Board members and the public had adequate time to understand the basic components of the reuse plan and have they been able to put this plan in perspective given our existing setting?

2) Does the draft EIR give adequate information about the impacts of the preferred project and provide realistic mitigations (or solutions) for the impacts?

3) Does the DEIR provide a reasonable range of project alternatives including one project designed to reduce significant impacts?

Until we can answer yes to each of the questions, it is premature to push the process beyond the draft EIR review stage.

Thank you for your consideration.

Sincerely,

Debra J. Mickelson

Debra J. Mickelson
P.O. Box 7591
Carmel, CA 93921
624-8755

encl.

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82-1

Monterey County Herald
LETTER BOX

July 26, 1996

FAX: 372-8401

The Draft Environmental Impact Report (DEIR) for the Fort Ord Reuse Plan contains numerous flaws. One is so serious that a Revised Draft EIR is legally required in order to comply with the California Environmental Quality Act. The DEIR fails to provide a project alternative designed to reduce the significant impacts of increased water, traffic, and wastewater.

5

In February, the City of Salinas, a FORA member, requested a project alternative constrained by safe use of on-site water resources. Even though the request was reasonable and CEQA requires the selection and discussion of alternatives that foster informed decision making, curiously, this sensible alternative is not included.

6

Certification of the EIR and the adoption of the current "preferred project" trigger land transfers to the cities and county. The land can then be sold to the private parties. This creates the developer's "constitutional right to develop the land to its highest and best use". It becomes a "land trap" destined to become the 72,000 person city.

7

This DEIR doesn't adequately describe the enormous environmental consequences of building huge new water systems, and new 4 and 6 lane roadways. It doesn't even provide an on-site location for a wastewater treatment plant. Neither does it tell us who pays for all this.

8

The solution is to prepare a project alternative that allows land to be used and sold so that the on-site, safe-yield water is not exceeded by the long-term reuse of the base. This would lessen other adverse impacts as well.

9

Local and county water agencies have been urged to request a revised draft EIR that would be recirculated for public review. Other agencies and concerned individuals are asked to do the same. Your voice will be heard. Write to FORA, 100-12th St., Bldg. 2880, Marina, CA 93933, by August 30th.

10

Debra J. Mickelson PO Box 7521
Debra J. Mickelson Address: Carmel 93921 Tel: 624-8755 am725

CITY HALL
BOX CC
CARMEL-BY-THE-SEA, CALIFORNIA 93921

2 August 1996

The Honorable Jack Barlich
Chairman
Fort Ord Reuse Authority
Building 2880
100 12th Street
Marina CA 93933

Dear Chairman Barlich:

As a voting member of the Fort Ord Reuse Authority Board of Directors, the City of Carmel-by-the-Sea requests that the Board's agenda for its meeting of Friday, 9 August 1996, be amended to include the addition of an item addressing the extension of the comment period on the Draft Environmental Impact Report for the proposed Reuse Plan until Friday, 13 December 1996, at 5 p.m.

The City Council of the City of Carmel-by-the-Sea has held two public hearings on this subject and received presentations from FORA's staff at both. Much public comment has been received, but there is much more to be made and the time remaining in which to make it is short.

We are all aware that the uses proposed in the transfer of the former Fort Ord represent the most significant development in Monterey County, indeed of the entire Central Coast, for decades. A project of this magnitude demands the most careful attention we can give. The product of judgments made today will be with us for generations; let us not invite our grandchildren and their descendents to condemn us for acting in haste. By working together in careful deliberation now, we have within our grasp the potential to create one of the finest documents of its kind ever produced, a document that can be a steady guide as we move forward toward our mutual goal of creating a land use of which we can all be genuinely proud.

Public comment received in Carmel-by-the-Sea to date has included considerable uncertainty as to the details of the DEIR, its impact on the community, and mitigation measures. Another theme heard repeatedly is that of frustration about the lack of ready accessibility to the very limited number of the Environmental Review documents in circulation.

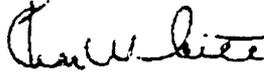
It has been the experience of our City that when adequate time is allowed to fully discuss a draft Environmental Impact Report, when an understanding and appreciation for its complexities can be had, ✓

Honorable Jack Barlich
Fort Ord Reuse Authority
2 August 1996

Page 2.

consensus on the project itself can more readily be attained. The citizens who addressed our City Council during the public hearing process brought this request for an extension of the review period forward. By bringing it to FORA's Board, we do not seek to defeat the project; rather we seek fully informed decisions.

Very truly yours,



Ken White
Mayor

KW:sam

- c: Voting Members, FORA Board
- Ex Officio Members, FORA Board
- Members of the City Council
- City Administrator
- FORA Executive Officer
- Director of Planning and Building

RECEIVED

MAYOR & CITY COUNCIL

AUG 2 1996

CITY OF
CARMEL-BY-THE-SEA

Please Forward to F.O.R.A.

8/1/96

I attended a special meeting held by the city of Carmel on the East End Redevelopment. I think it is too massive a development for this area. Many questions on density, planning, water, alternative choices of transportation were not answered by F.O.R.A.

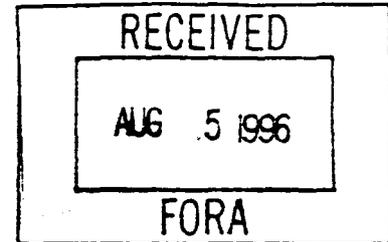
The DEIA report doesn't address the problem of additional water for this huge development. Monterey County has had a major water problem for many years & can not afford to give any water to this project.

I would like F.O.R.A. to extend the deadline to December 15, 96 so that the citizens of Carmel by the Sea and all others who are affected by this project can be informed on the impact this development will have on all of us.

Thank You.
Louis D'Agostini

August 1, 1996

Ann Hebenstreit
Fort Ord Reuse Authority
100-12th Street, Building 2880
Marina, CA 93933



RE: Draft Environmental Impact Report for the Fort Ord Reuse Plan

Dear Ms. Hebenstreit:

The Santa Cruz County Regional Transportation Commission staff has reviewed the Draft Environmental Impact Report for the Fort Ord Reuse Plan and has the following comments. As stated in previous letters, the Commission continues to be enthusiastic about the prospects and potential benefits this redevelopment will have on the Monterey Bay region.

As mentioned in our previous comments, our greatest concern is the potential effects this significant change in land use will have on intercounty and regional travel patterns. The new land uses proposed include University of California research facilities, a San Jose State University extension campus, and the new California State University at Monterey Bay educational institution. These prominent educational facilities will draw both students and employees from not only the Monterey County area, but also from Santa Cruz and Santa Clara counties. Table 4.7-3 on page 4-79 shows that traffic volumes traveling north to Santa Cruz will at least double by the year 2015, with greater increases expected with buildout, lowering the Level of Service for this segment to LOS F. The Traffic section does not adequately discuss these effects or potential mitigation in any detail. Table 4.7-2 on page 4-74 includes a possible widening of Highway 1 from the Santa Cruz County line to Castroville under the optimistically financed heading. This does not adequately address the infrastructure needed to mitigate these impacts to the regional transportation network.

In regards to transportation demand management strategies, no mitigation listed recommends coordination with the Santa Cruz Metropolitan Transit District for transit service between Santa Cruz and Monterey Counties to provide increased intercounty transit service. Coordination is also needed between Santa Cruz and Monterey Counties rideshare agencies in order to promote the use of carpools, vanpools, transit services, and other alternative modes between counties.

In addition, both our Commission and the Transportation Agency for Monterey County are conducting rail studies to analyze the feasibility of developing passenger rail systems in each

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county and possibly between Santa Cruz and Monterey Counties. These studies should be referenced and discussed in the FEIR in terms of how such rail transit might alleviate future traffic impacts associated with the reuse of Fort Ord.

3

The Association of Monterey Bay Area Governments produces its Metropolitan Transportation Plan (MTP) which compiles regional transportation policies and programs for the Santa Cruz, San Benito, Monterey County region. This FEIR should be reviewed for consistency with this plan in regards to impacts to the regional transportation network.

4

Thank you for the opportunity to review this document at this time. If you have any questions regarding these comments, please contact Teresa Buika of my staff at (408) 454-3073.

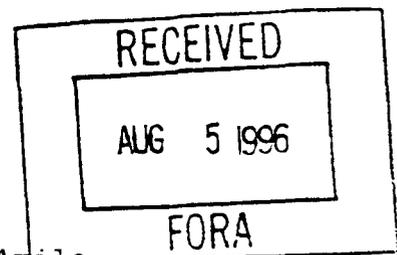
Sincerely,



Linda Wilshusen
Executive Director

cc: TAMC
AMBAG

tb2:foreuse



Eleanor Avila
6405 Brookdale Dr.
Carmel, Ca. 93923
Aug. 3, 1996

FORA
100 - 12th St. Bldg. 2880
Marina, Ca. 93933

Dear Sirs:

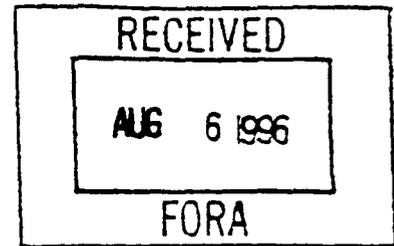
The enclosed letter to the editor of the Herald is startling, to say the least. I am not an activist in any sense of the word, but dread the 72,000-person city scenario. I've lived in the valley for 30 years, and seen the traffic and water problems compound over the years. So I'm concerned.

PLEASE revise the EIR, give the public plenty of time for review--one that includes a project alternative addressing water, traffic, and financing.

Yours truly,

A handwritten signature in cursive script that reads "Eleanor Avila".

Clayton Anderson
Post Office Box 5067
Carmel, CA 93921
(408) 624-3208 Telephone
(408) 626-6201 Fax



3 August 1996

FORA
100 12th Street
Building 2880
Marina, CA 93933

Dear Members of the FORA Board:

There are many questions about the Ft. Ord Reuse Plan and the related Draft Environmental Impact Report that are unanswered. Much more time is needed for the public to understand and react to this enormous plan.

When your Executive Director Les White appeared on August 1 before a special meeting of the Carmel City Council, he was asked many questions about water, waster water treatment, the proposed expansion of local highways, design guidelines, and the funding involved. Here are some of his answers:

"I don't know."

"I don't have the details."

"Many questions are yet to be resolved."

"I'll have to get the answer."

"I need further direction from the FORA board."

"There are no magical answers."

Listing eight important elements that remain unresolved, the Carmel City Administrator said, "This is a very complex issue."

In other words, this entire process needs more time and more work so that the public will be far more informed of the impacts of this unprecedented development. We hope that you will agree with the City of Carmel's request to have the deadline for comments on the Draft Environmental Impact Report extended from August 30 to December 13.

Thank you.

Sincerely,

A handwritten signature in cursive script, appearing to read "Clayton Anderson".

Clayton Anderson

MEMORANDUM

Aug 7, 1996

To: Fort Ord Reuse Authority
From: Harvey Kuffner
24710 Dolores Street
Carmel, CA 93923



Subj: Comments regarding Ft. Ord Reuse Plan and EIR.

It is my understanding that the Ft. Ord Reuse Plan upon which the EIR is based is to replace the economic loss resulting from the military deactivation of Ft. Ord. To me this planning premise is invalid considering the actual impact to the neighboring communities.

At first there was an immediate vacuum felt by the departure of the military. School population declined, rental housing became vacated, and retail stores lost customers. Since then, however, the local economy has rebounded, school population has increased, and with the advent of CSUMB, the retail customer base has started to return.

It must be remembered that most of the soldiers and their families who were housed on the base shopped at the Army's PX, bought their auto supplies on base, used base recreation facilities, and were treated by military doctors and dentists. Ft. Ord personnel lived basically in an insular environment with limited interaction outside the base.

To conclude that the military population should be replaced by a civilian counterpart in order to replace the economic loss is erroneous logic. To plan for a community of more than 70,000 people with 13,000 new homes and 1,800 new hotel rooms is folly. Understandably, such plans would greatly benefit the cities who look forward to receiving the Army land as a way of increasing their tax bases.

Specifically regarding the EIR, the report is fallacious and should be rejected as inadequate unless it:

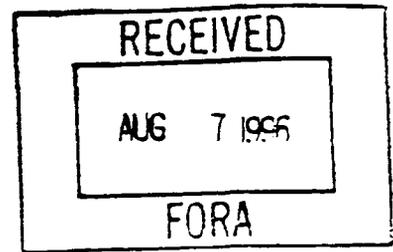
1. Details precisely how to resolve the significant requirement for water, effluent treatment, and trash disposal for all the proposed construction projects and population influx expressed in the 50 year plan,
2. Plots the traffic impact and resulting road construction,
3. Identifies who is responsible for all the infrastructure required including the building of additional schools and recreational parks,
4. Addresses in detail the funding requirements for 1-3 above and how the funds are to be obtained,

5. Consider, in concert with the Ft. Ord Reuse Plan, the additional impact on resources resulting from pending and planned peninsular construction projects such as: Armstrong Ranch north of Marina; Vacation Club off Reservation Road in Marina; Bishop Ranch with golf course in the Laguna Seca area ; Monterra Ranch with golf course west of Monterey ; Pebble Beach lot expansion program with golf course; Rancho San Carlos with golf course in Carmel Valley; and September Ranch in Carmel Valley.

Let's not be persuaded by the casual remark that since this is such a long range plan, all the particulars cannot be examined in detail. Others may try to convince that this planning document is subject to modification as circumstances change. There premises are smoke screens to disguise inadequate preparation. Furthermore, we shouldn't accept such statements or claims because we can rest assured that if it's in the plan, it will undoubtedly happen as shown.

I suggest that your planning staffs or an outside authority should analyze the EIR for their professional judgment before you make a decision on such a impactful matter.

Linda C. Anderson
Post Office Box 5067
Carmel, CA 93921
Telephone (408) 624-3208
Fax (408) 626-6201



4 August 1996

FORA
100 12th St. Bldg. 2880
Marina, CA 93933

Dear Members of FORA and FORA Staff:

I am writing to express great concern about the draft EIR on the re-use of Ft. Ord. There will never be a more important or far-reaching document before any public body on this Peninsula. | 1

Because the DEIR is so long, so complicated and so expensive, the public at this point is virtually unaware of the enormity of the proposed plan. Because you, the FORA board and staff have invested so much time and energy in this process, I am sure you would also want the most intelligent public input possible. This cannot happen without more time. To rush this through to an August 30 deadline for comments is not the fair or right thing to do. *I urge you to extend the comment period until December 13 as requested by the city of Carmel.*

In the two FORA presentations I have heard, emphasis has been placed on a 2015 Scenario with comment being made that it is difficult to project beyond that date. This appears to be an attempt to keep the public from focusing on the overwhelming impacts of full build out. Even if full build out does not occur during my lifetime, I do not wish to leave a destroyed Monterey Peninsula to my children or grandchildren. | 2

The DEIR does not offer adequate solutions, mitigations or environmental analysis for the immense impacts of this plan. The program EIR, allowing study of these issues to be deferred into the future, is in effect saying "Don't worry about it; trust us. We'll work this all out later." All of the hard decisions have been avoided, presumably because everyone, including the FORA staff, knows they are controversial.

- Where will the 18,000 acre feet of water come from? | 3
- How will the waste water treatment capacity be expanded? Where? | 4
- Do we want our local highways widened to four and six lanes? How would this extensive work be funded? | 5
- Why does this plan develop twice as much land as the army developed at Ft. Ord? | 6
- Is this plan assuming a new Hatton Canyon Freeway? | 7
- How can the Highway One corridor keep from being visually impacted without | 8

Linda C. Anderson
4 August 1996
Page 2

- design guidelines?
- Why is there no height limit on new buildings? 9
 - Can this Peninsula absorb a 57% increase in population? 10
 - Can this Peninsula absorb the influx of 1800 more hotel rooms full of tourists who do not worry about water conservation? 11
 - Has the plan factored in the new hotel rooms and development which is already under way? 12
 - What are the impacts of this plan when taking into consideration projected growth of the entire region? 13

Once these elements are built into an adopted plan, it will be far harder, if not impossible, to modify them. The *Carmel Pine Cone*, on July 18th, warned: "If you put it in the plan, it will happen." 14

The City of Salinas requested that the DEIR analyze a project alternative which would use only safe-yield, on-site water. This would be a project roughly the size of Monterey. I request that you recommend a revised draft which would include this option. 15

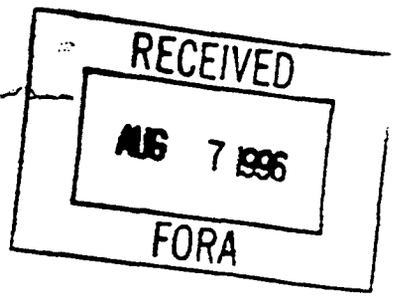
Thank you.

Sincerely,



Linda C. Anderson

CC: Mayor Ken White and members of the Carmel City Council
Chairman Cari Livingston and members of the Carmel Planning Commission



Carmel Residents Association • P.O. Box 13 • Carmel-by-the-Sea • California 93921

August 5, 1996

Fort Ord Reuse Authority
100 12th Street, Bldg 2880
Marina, CA 93933

RE: Public Comments on Draft EIR

Dear FORA Members:

The Carmel Residents Association (CRA) has serious concerns about the adequacy of the Fort Ord DEIR. This is the largest, most all-encompassing project that will ever come before you. As it now stands, the plan proposed by FORA will have major detrimental impacts on all Monterey Peninsula residents and businesses.

We have an extremely complicated issue with little time built in to allow citizens to become aware of and respond to the major changes built into this plan. We would therefore ask that you use your influence to extend the deadline for certification of the DEIR to well beyond August 30, hopefully until the end of the year. This would allow much more public involvement and give candidates for the November elections a chance to let their constituents know how they feel about this plan.

The DEIR preferred project requires the use of too much water (as much as the whole peninsula now uses); it would use 90% of the peninsula's wastewater treatment capacity; and, it would severely impact peninsula highways. We feel that the DEIR should specifically explain how these severe infrastructure impacts would be solved. Letting agencies "Solve these problems later" is not a good answer.

FORA letter
page 2

We also hope the DEIR will be revised to include a project alternative suggested by the City of Salinas in which development would be restricted to that which can be accommodated by the water that now exists on the Fort Ord site. | 5

Thank you.

Sincerely,



Mary P Condry
President

MCOE PUBLIC COMMENTS/QUESTIONS

Key: PI = phone in A=audience

PI 1 - ref in air to holding ponds, reservoirs

See # 107

Paul responded - the primary initial reservoir to be constructed is logically one that will allow the use of reclaimed water for irrigation purposes on the base. this would extend potable water supply from the wells and that reservoir is currently contemplated within the armstrong ranch rather than in the boundary of Fort Ord. Whether it be on Fort Ord or armstrong ranch, the terrain is sandy and therefore the reservoir will have to be lined. In this instance, the first definitive aspect of reservoir siting is for this particular purpose and that site is in armstrong ranch property.

91 A1 - Joe Cavanaugh - Member of original task force in 1991 - 700 page task force strategy report - basis for subsequent planning. The first plan in Dec 1991 called for 180-185,000 jobs at Fort Ord. One of the original who talked about a 50 year horizon contrary to normal planning regiments but this was important for establishing open space and habitat management plan. The plan looks out realistically 20 years in terms of water.

92 A2 - Lawrence Dickey, Carmel - DEIR dated May 31st concerned citizens asked for time to study the 3 volume report and for workshops to work out perceived problem areas with the FORA Board, now only 3 weeks to the last scheduled public hearing, residents have been given part of 2 hours to tell the voting members of FORA Board our concerns of unwarranted impact of the proposed project. FORA Board members are not here and this is not what we wanted as a mutual workshop. Why aren't all members here tonight. Will staff members tell them what has been said here and what to think. Are the mayors, councilmembers and supervisors unable to listen and decide for themselves as members of FORA. Why aren't all members here tonight.

Les commented/Doug commented

PI 2 - Mayor Vocelka - FORA Board members definitely watching this forum.

PI 3 - Eric Ramos - housing See # 108

93 A3 - Gillian Taylor - Carmel Valley - concerned about impacts on Monterey area inspite of what has been said about previous plans and how extreme they were. three points - water usage - deir says project needs 18,000afy, the document is inadequate because it fails to provide any data as to the existing situation in the monterey area and fails to put the 18,000afy into perspective so we know what we are dealing with, as a comparison to this projects water requirement to

91, 92, 93

93 18,000afy, the entire Monterey Bay area will use about 20,000afy this year, that 15,000afy from Cal am, 3,000 from private carmel valley wells and about 2000 from MCWD. It has taken about 200 years to create this need for 20,000afy and yet this proposal is calling for nearly doubling our current water useage in 50 years. Regarding growth, the proposal is growth inducing as defined as CEQA and should be identified as such in a revised deir, regarding water quantity and source - MCWRA is going to advise FORA that there is only a total of 6600afy maximum for use that can be taken from the Salinas valley basin for this project - where will all the additional water come from. In 1995, voters turned down the dam, in 1992 supervisors and CWRA eliminated sprinkle pipeline from list of potential water delivery systems. This plans relies on the importation of water to solve its water shortage problems and yet the eir does not define or clarify the phrase importation of water, it fails to state who will be required to give up water for this massive scale of development, it fails to notify those who would contribute their water to allow this plan to be realized and it fails to use good faith in fully disclosing the method of importing the water, the source of imported water, the environmental impacts of the system and the impacts of the water taking. We need to know these facts before the plan is irrevocably set in motion.

Les - development isn't going to procede beyond 2012,13,14 if there isn't an alternative source developed and from staff perspective, there are not alot of people counting on importation, there has been a number counting on desalination as a possibility and reclamation potentially capturing through reservoirs on the base more water there and it could be any combination of those that would be assessed for the potential for serving the base beyond the 6600ft.

Groves comments on EIR perspective that from a project perspective that water can be mitigated to a less than significant level from a cumulative perspective, when you will be pulling water from the basin and have a water shortage already in areas as discussed, perception out there that there hasn't been historical use here, there has been 6600afy of historical use, that has been put into a contract between MCWD and Army. The Army has a guarantee for this. The plan itself has been geared for a 20yr timeframe to look at that 6600afy. We looked at the water restraint and asked whay would be allowed over the next period of time. Essentially you've got water for approx 15-18 years... Groves then talkš about desal plan with state parks....

Paul said that beyond the 6600afy in order for the plan to be built out additional sources of water will be required. That is clearly stated in the EIR. At this stage, the approach that is included in the EIR is to assume if we took at a look at the most expensive alternative we would use that as the basis for planning and we would have fulfilled a requirement of not understating what that cost would be and therefore what the future development would have there. So for the purposes of the Business Plan carried forward into the EIR, a desal plan has

been costed, and the basis of that costing has been the Santa Barbara plant which has been constructed and is a here and now comparison. So the concept that is in place here is to utilize the 6600afy fortunately it happens to match the market projections for the 2015 horizon, beyond that we've used the cost of the desal facilities as the most expensive both for capital and operation cost to project what the funding requirement would have to be to fulfill that future water source requirement whether it is desal, whether it is imported water, if there is another source that is brought forth by the water agency, whether it is additional reuse of stormwater - all of that is possible and we do think the prudent approach here is to suggest the highest cost is the one we used for the analysis.

PI - Patty Bradshaw, Marina - Armstrong Ranch *see #109*

94 A - Annette Cochran, Pacific Grove - The desal plant is not described in the deir - there is no location provided other than somewhere west of hwy one, located in the future state park the reader cannot know how big the building is, whether large power lines are needed, will there be noise and outside lighting requirements making it incompatible with the state park that plans campgrounds and perhaps a 40 room lodge. special attention should also be given to the cursory data provided on seismic and liquafaction for the sand dune area west of hwy one, data provided would leave the reader to believe that a desal plan should not be sited in such a high potential hazard zone, there fore, a site east of hwy one, that would preclude urban development should have been included in the deir. No estimate of the volume of water needed from the desal project is provided, no information is provided about the feasibility of outfall and in-tank pipelines extending into the Monterey Bay National Marine Sanctuary. No data is provided as to the feasibility of rainey collectors and re injection pipelines or whether there is sufficient wicth of beach to support the required distances between a certain number of pipe systems. No environmental impact data is provided. the deir is inadequate.

Michael comments/Doug responds

PI - Mr. Groves - Carmel Valley - who is paying for the land *see #110*

95 A - Karen Morgan - Pacific Grove - To develop an economic employment to compensate for base closure , this leads the reader to believe that there is substantive information in the deir or other accompaning documents to prove that there is, in fact, something to recover from. the public concern is that the need to recover will be used to justify a 72,000 person city. "As the means to recover economically - that is it will be used as an overriding consideration to justify the significant negative impacts. Where is the data provided regarding the base closure and its direct measurable economic impacts on any surrounding communities. News clippings can be provided that appear to refute the need for economic recovery. Headlines include Peninsula Housing Sales

94,95

95 Rise - Sept. 93, Car sales up despite gloomy predictions not hurt by Ord closure - Jan 94, County jobless rate defies forecast, improves since Ord closure - Feb 94, Monterey County real estate sales in sharp rise during April - May 96, County awash in jobs - State jobless rates dips to 1991 level - July 96. If no data exists in the deir to provide substantial evidence that there is a need for economic recovery this language should be deleted from consideration. A revised deir should be prepared that retains the intent of senate bill 899. Any attempt to use economic recovery as an over-riding consideration will be challenged.

Michael comments/les comments

~~Pl - Bernard Finley - Downward adjustments in deir~~

96 A - Bernard Finley - Carmel - the deir provides no information as to what type of water is to be recharged, how it is to be recharged and for what purpose. The phrase, "on site storage facilities" does not describe what type of water is to be stored and in what matter and what purpose. There is a reference in volume 2, page 4 - 158, that future selection of reservoir and water impoundment areas could preclude urban development" - If plans for the total number of future homes and office parks need to be reduced in order to provide more critical infrastructure, those downward adjustments must be reflected in the deir, therefore, the conclusion is that the deir is inadequate and needs to be revised.

Paul comments he was not aware that there is a reservoir location in the manner you have given us here that is scheduled within the housing areas. There are reservoir sites that will be constructed and in this case when we talk about reservoirs please a reservoir can be a concrete tank such as we have on Fort Ord now and that sort of a construction that will be additional reservoirs required as concrete tanks. they don't disrupt the urban pattern. The other major surface reservoir for the reclaimed water, not potable, is the one described earlier that is now being considered on the Armstrong ranch. There is a water reservoir now on Fort Ord that irrigates the current golf courses and it is within an area that is scheduled for housing in the future, but that reservoir site is protected currently in the planning. I don't see a major housing reduction coming about as a result as this.

(Pg 2-9 Table 2.4-2)

97 A - Peggy Jorgensen - Carmel - concern on groundwater. the deir states that alternatives 6r, 7 & 8 are inconsistent with the policies regarding groundwater - we would like to know what are the policies on groundwater.

Paul comments the assumption Mr. White announced earlier starts out the basis for an answer - the agreement that exists between the Army and MCWD that occurred when the Army purchased its way into the Zone 2a of the Salinas valley aquifer and as a result 6600afy as a diversion from the groundwater is

95, 96, 97

4

identified. The EIR does rely on the continuation of that agreement and Mr. Holland can give you views from the legal perspective. But the implication from the groundwater and the agreement in existence says that the potable water use on Fort Ord within the Fort Ord boundary that the 6600afy diversion from the Salinas basin can occur until such time as the water resources agency will bring in water from another source. That time, if and when it occurs, then it is mandated that the 6600afy be replaced by whatever amount is brought in by them. Those are the guidelines and current parameters in respect of the groundwater legality.

PI - Mr. Clayman - Seaside - marina resort plan *see # 111*

Michael comments

98

A - David Dilworth - The 3 E's are excess, exaggerated and extreme. Ann earlier described using existing infrastructure but she was silent when it came to traffic, when it comes to traffic - the answer at the PG workshop that there will be not \$8mil of improvements, not \$80mil, it will be \$800mil for infrastructure improvements for traffic. To compare that to other projects the Hatton Canyon Freeway much in dispute is only \$40mil, the prunedale bypass is \$225mil yet with this project and using existing infrastructure is going to cost 3 times what the prunedale bypass would and expecting someone to pay for it. He heard M.Groves say we do not have to do an eir - are you saying when you get the expected legal challenge to this document, when you get sued - are you going to say well we did not have to do it anyway - Do you intend to wait to build until the Fort Ord cleanup in complete, all the toxics and the unexploded weapons out there. Les described that the water would only last until the year 2015, what percentage of the project is that? Is there an alternative that is one half to one third the size of the project that you are proposing. Please reiterate that. Couple final points - page 2-8, no project alternative - no project to me means something along the lines of 0 and no project alternative does not have 0 people, it has 14,000. I think you missed. Cost will hopefully be shared amongst jurisdictions was described for the demolition - is Carmel going to be sharing in the cost of demolition, how about PG and Monterey. When the cities of Marina and Seaside are going to be benefitting from this it seem optimistic to expect the others to help along with that. Take this back to the FORA Board and suggest an alternative at least one-half or alot smaller, perhaps a quarter, to be something that is recommended.

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Paul, Les, Michael, Kathy Clack, Gail Youngblood

Paul comments hopes he will put the context of the \$800mil in a much more regional context than just Fort Ord. The fact of the matter is that planning that has come up with that figure is the continuing on-going planning by another public agency - TAMC - and the basis for arriving at what you see a large and monstrous figure - it reflects the deficiencies that are here in the county overall.

98

5

The Fort Ord plan, out of definite intention depends upon TAMC to do the projections and to set the amount of improvements necessary regionally. That figure you have sited is the regional figure, not Fort Ord figure. Within that context Fort Ord fair share of the whole \$800 is about \$136mil - but it is the figure that has been used in the preparation of the operating plan, reflected in the eir, as the necessary amount of investment that the future reuse must carry in order to do its fair share overall. It is not Fort Ord that creates the demand for the \$800mil.

PI - Marilyn Davis - Seaside - How much water allocated while 7th here ^{see} #112

Paul - the maximum amount of water was 5400afy, that represented the maximum diversion from the groundwater. That water hasn't been given away, it is part of the 6600afy.

99

A - ^{Lou}~~Lew~~ Ungaretti - Carmel - at the scoping stage for this eir, requests were made for up to date data regarding the status of seawater intrusion underlying the base in both the 180ft and 400ft aquifer. No up to date data is provided. As far as the public knows the last data was made available in Dec. 90. For the seawater intrusion program, reflecting data recorded in 1985, the document went on the state that assuming a rate of seawater intrusion as the base of 500ft per year a new well field would be adversely affected in 15 years and an unsubstantiated opinion is stated on page 4-45 - intrusion has slowed and not stabilized - it is understood that Army may have many wells for toxic monitoring purposes throughout the base. Chloride data needs to be collected from these appropriate wells and must be included in the revised eir report. The seawater intrusion in the Salinas valley basin has been repeatedly characterized as a crisis over the last few years, now we are asked to build a 72,000 person city over an area known to have this water quality and quantity crisis.

Paul comments - the absence of current chloride is accurate. The basis upon the conclusions about anticipated well life have been based are previous figures - as part of the EIR none of that data was collected other than to depend upon previous figures - in respect of the Fort Ord infrastructure study. a projection was made as to how long the existing wells were expected to last - the well life was in the 25-30year range - that is reflected not in the eir, but in supporting document. The document was published in Jan'94 and reflected some of the information you stated, I believe the most recent is 91-92 info.

PI - eir inadequate, water pumped from the wells

100

A - ^{Sean}~~Shaun~~ Flavin - Monterey - First question on consistency - When we go to the enabling law which provides the mandate for FORA we find a somewhat different expression of the goals - 1 - to facilitate the transfer and reuse of Fort Ord with

99, 100

100 all practical speed 2 - to minimize the disruption caused by the bases closure on the civilian economy and people of Monterey Bay area 3 - to provide for a reuse and development of base area in ways that enhance the economy and quality of life of the Monterey Bay community and 4 - to maintain and protect unique environmental resources of the area - that is the scope of 899
At page 2-6 of deir - read project objective statement - This is a whole new concept, that the purpose of this project is to accommodate regional growth and we see that running through the deir everywhere that Fort Ord is going to become a magnet and it will absorb regional growth for this entire area. That is not the mandate of FORA. FORA was to repair the damage. 80% of the projected development will be accommodated during the 20 years to 2015. That will be accommodated in turn with 6,600afy, the remaining 20% of the projected development to follow 2015 will require additional 11,400afy bringing total to 18,000afy. There is some lack of proportionality there.

Michael - you cannot achieve economic recovery, attract employers to Fort Ord unless you have affordable housing or moderately priced housing.....

101 A - Bud Nunn - volunteer Fort Ord task force - In PG Letter????
Before the month is out the public is suppose to be able to comment intelligently and constructively on a plan that will dominate developments on the peninsula beyond the foreseeable future. We are now told it is tiered off the EIS, so we need to review that and its 16 alternatives. The most important request is that FORA extend the deadline for public comment on the reuse plan and its deir as long as absolutely possible, next year would be too soon. In case some of the Board members actually look at this tape look at those waiting to comment.

Les comment

102 A - Shirley Humann - Carmel - the deir should follow the rule of CEQA in that a full disclosure is a basic component, each FORA member must provide economic information for each fiscal year ending 1989 and 1995. For prospective data must be provided for the city of Watsonville. The following data must be provided along with the source of the information for verification purposes. City and County general budget, sales tax, number of employed and unemployed and school enrollment, this data should be provided to the public at the FORA meeting in Sept. and should be included in a revised deir.

103 A - Debra Mickelson - about the question on the deir provides no data on current water use at the base. We need to know how much water was pumped from the only water supply source from the base, how many people are living out there, how many wells are metered and we need substantial evidence of water waste and line loss. We are done studying and thinking, we need reality applied. Provision of this data in a revised deir is critical because the current document leads the reader, audience to believe there is 6600afy of water waiting for

103 developers. It is simply not the case. There is obviously already water in use, there may also be water waste and line loss occurring. These truths must be built into an adequate eir.

PI - Mr. Robertson, Carmel - off-site road improvements and affect hwy68 & reservation road

see # 113

Paul - the planning for the 68 improvement is not a function that the Fort Ord reuse plan deals with and this eir does not begin to focus specifically on which route of hwy 68 the improvement would follow. His points on residents along hwy 68 and reservation road - one of the alternatives is to bring the new route of 68 through the southern area of Fort Ord and an easement has been set aside for that possibility. It is up to the state of CA, Caltrans to do the planning for that circumstance if the route thru Fort Ord is selected, then the impact upon the current residents would be minimized. It is a decision beyond the Fort Ord process.

104 PI - ^{Eric} Mr. Ramos - Marina - when BLM take over Fort Ord ?

105 Elliott Whittied from Seaside - We have alot of discussion about water and environmental impact and some mention of economic development- the whole problem here for Seaside is we are not talking about water, economic development so much, we are talking about people. Seaside has people in it and these people need jobs, these people need to realize a portion of the hospitality pie that is divided up here on the peninsula. These people need to live in self respect, these young people need jobs. We can always desalinate water. We put our navy and army on ships and they drink water and they are healthy and they fight for us but when it comes time for us to drink it - there seems to be some kind of a problem. We can get water, that is not the problem, the problem is getting the land out of the hands of the army and into the hands of FORA and to the hands of someone who can develop it properly and with equity for everybody.

PI - ^{bne} ~~Miss~~ Haines -housing

see # 114

106 A - Linda Anderson - seawater intrusion is caused, experts say, by overpumping the groundwater aquifer - the armys deis states that armys water use averaged 5,100afy during 86-89 and 3,325 in 94. the deir "recent pumping in former Fort Ord exceeded safe yield in the 180 and 400' acquirer as indicated by seawater intrusion" Requests were made during the eir scoping period for information regarding the safe yield of the base. The army deis in part states "this indicates that safe yield available to Fort Ord and other seaside basin users maybe less than the total pumpage of 4700afy. The deir contains no information about safe yield and is inadequate. The city of Salinas, in feb96 scoping comments - requested that the deir include a project alternative designed to reuse the base

103, 104, 105, 106

2)

106 using only safe yield, on site water. CEQA mandates a reasonable range of alternatives and requires that an alternative be designed to reduce the significant impacts of the project. The deir fails to provide the basic function of CEQA and is inadequate. A revised eir must be prepared with this reasonable project alternative requested by the city of Salinas. it must be fully defined and analysed as directed by SB899. This requires an analysis of safe yield in the first part of my question - would you please comment on the lack of safe yield statistics, the absence of analysis of the alternative requested by Salinas and also the discrepancy between your use of 6600afy as opposed to the one that is in the deis using 4700 as possible number available.

Paul - the difference between the 4700 and 5400 is an interpretation that rests with the MCWRA. Given that definition - the 6600afy has a condition that at the point of time the 5400afy (assumed as the safe yield by the MCWRA) is exceeded, that the well must go into the 900'acqifer to supply the additional water supply.

Michael - we have put into the project description iteself the water contrait alternative, this includes both the buiidout of the reuse as well as the restrain alternative which we interpret to be the 6600afy.

FORA Reuse Plan/EIR Study Session - Questions

107

Name Grace Silba-Sentella Phone 883-1861

Address 3230 Susan Ave City Marina Zip _____

Question: Reference in EIR to holding area | 1
(reservoirs) - are there maps
showing location of reservoirs -
where can they be obtained

• Have there been geologic studies | 2
done for placing reservoirs and
whether land is suitable?

FORA Reuse Plan/EIR Study Session - Questions

108

Name Eric Ramos Phone 883-8158

Address _____ City Marina Zip _____

Question: (CSUMB student)

Will more housing be allotted | 1
to the University?
(85% is occupied, according
to statement)

Ann

Fort Ord Reuse Authority

August 7, 1996

FORA Reuse Plan/EIR Study Session - Questions

109

Name Patty Bradshaw Phone _____

Address 3107 Flower Circle City Marina Zip _____

Question:

Will Armstrong Ranch be allocated water in exchange for making land available for residential?

1

~~★~~ Please send her FORA Reuse Plan map. Michael Paul

Fort Ord Reuse Authority

August 7, 1996

FORA Reuse Plan/EIR Study Session - Questions

110

Name George Grover Phone _____

Address 20 Lakeside City C.V. Zip 93101

Question:

Who's paying for the land? As a taxpayer I feel no jurisdiction should get the land and charge. The Army should get a fair price!

1

FORA Reuse Plan/EIR Study Session - Questions

111

Name Adam Clayman Phone _____

Address 5200 Roe Ave City Seaside Zip _____

Question: How does the recent decision by the City of Marina to go ahead with their resort plans after ignoring Sierra Club's request to move project due to environmental impact affect plans for coastal area within Fort Ord?

3-96 WED 03:39 PM FORA

FAX NO. 408 883 3675

P. 06/17

Fort Ord Reuse Authority

August 7, 1996

FORA Reuse Plan/EIR Study Session - Questions

112

Name MARILYN DAVIES Phone 899-4481

Address 1581 LATHROP City SS Zip _____

Question: How much water was allocated while the TIT was at FTOR? and after they left what happened to that allocation. i.e., how has the water been absorbed since?

111, 112

113

CV

FORA Reuse Plan/EIR Study Session - Questions

Name ~~George~~ Robertson Phone 624-4927

Address P.O. Box 5 City Canal Zip _____

Question: How are off-site road improvements/expansions that will be needed & necessary going to affect the residents along Hwy 68 and Redoubt Road?

~~How much will they cost and how will they be funded?~~ over?

• What specifically will the off-site traffic impact be in the surrounding communities with the addition of 72,000 people to the Peninsula?

Fort Ord Reuse Authority PHONE August 7, 1996

Fort Ord

FORA Reuse Plan/EIR Study Session - Questions

114

Name Joan Hauner AMV Phone 375-5913

Address 850 Maple City PG Zip _____

Question: The 1992 ^{state} County housing plan # 1 the plan indicated that 1200

houses at the Fort were set aside for use and moderate to meet the county's housing goals.

Is this consistent w/ the FORA Reuse plan we're reviewing tonight??

113, 114

Fort Ord Reuse Authority

August 7, 1996

FORA Reuse Plan/EIR Study Session - Questions

115

Name EDWARD BOTSFORD Phone 626-6342

Address P.O. BOX 4293 City CARMEL zip 93021

Question: The DEIR provides no data on 2 1

current water use on base. The EIR is in-

adequate. How much water was pumped from

the E. Garrison wells in 1995? What was 2

the residential population at the point of supply

& what other users existed on the base.

PLS. clarify whether all users are now 3

metered. PLS. provide substantial evidence 4

about water waste & line loss at the base

Fort Ord Reuse Authority

August 7, 1996

FORA Reuse Plan/EIR Study Session - Questions

116

Name Clark Beck Phone 655-8586

Address 23765 Spectacular Bid City Monterey zip 93940

Question: Quantity of water required for 1

the project is 18,000 A.F. annually.

Quantity available is 6,300 AF. DEIR

still says either less than

significant impact or no significant impact

from this issue.

This statement only. No back up data.

Why?

115, 116

Fort Ord Reuse Authority

August 7, 1996

FORA Reuse Plan/EIR Study Session - Questions

117 Name Mary Ann Matthews Phone 659-2528
Address Box 381 City Carmel Valley Zip 9392

Question:

1 How can FORA preferred alternatives have fewer impacts on sensitive habitat than Army alt. GR when it doubles the density?
2 Why does Army GR fail to meet economic recovery when it provides 27,000 jobs to replace 20,000 lost?
+ more

Fort Ord Reuse Authority

August 7, 1996

FORA Reuse Plan/EIR Study Session - Questions

118 Name CLAYTON ANDERSON Phone 624-3208
Address BOX 5067 City CARMEL Zip 93921

Question: FORA STAFF THREATENING THE PUBLIC,

IMPLYING THAT UNLESS THIS DEIR IS CERTIFIED
& THIS PLAN APPROVED, THE ARMY WILL SELL THE LAND
① WILL YOU PROVIDE A COPY OF LTR FROM ARMY
PROVIDE THEY WOULD TAKE THIS STEP
② LIKE YOU CITE SECTION OF DATE Realignment + Closure
LAW WHICH STATES WHEN + HOW SUCH A SITUATION
COULD LEGALLY COME ABOUT?

FORA Reuse Plan/EIR Study Session - Questions

119

Name Pete Leonard Phone _____

Address 44 Madonna Ln City Salina Zip 9390

Question: Topic: national cemetery

FORA Reuse Plan/EIR Study Session - Questions

120

Name HARVEY KUFFNER Phone 626-1951

Address 24710 DOLORES ST City CARMEL Zip 93922

Question: _____
WHO DETERMINED THE PLANNING
PREMISES FOR FT ORD REUSE PLAN?

Fort Ord Reuse Authority

August 7, 1996

FORA Reuse Plan/EIR Study Session - Questions

121

Name Constance Wright Phone 624-2572
 Address Box 2331 City Carmel Zip 93921
 Question: In Monterey Co. residents are told that there is a seawater intrusion crisis, water distribution problems, farming operations must curtail, and existing residents that there's a critical water shortage. The DEIR states that the "regional water supply shortage would not be solved by the proposed project"
Please Comment

Fort Ord Reuse Authority

August 7, 1996

FORA Reuse Plan/EIR Study Session - Questions

122

Name FRANKIE LANEY Phone 624-3130
 Address Box 1582 City Carmel Zip 93921
 Question: The public concern is that the supposed need to "recreate" 20,000 lost jobs will be used as an overriding consideration to justify the significant negative impacts of this project. Any attempt to use "employment recreation" as an overriding consideration will be challenged. Please comment.

121, 122

Fort Ord Reuse Authority

Comment only

August 7, 1996

Phone

FORA Reuse Plan/EIR Study Session - Questions

123 Name Yoko Whitaker Phone 626-4559

Address P.O. Box 724 City Latmel Zip 92321

Question: I would ^{like} to speak to the issue of
project alternatives. The key issue is
the selection and discussion of
project alternatives is to foster
informed decision-making.
The Draft EIR fails to provide
reasonable alternatives to the
preferred project. The Draft EIR

fails to provide alternatives
that comply with the required
reuse plan elements contained in ^{Senate} Bill
~~899~~ 899. The Fort Ord Reuse
Authority is being asked to
overstep their boundaries. Therefore,
the Draft EIR fails to provide
feasible alternatives and the
document is inadequate. Please
comment on this.

Fort Ord Reuse Authority
Const

Home Call August 7, 1996

FORA Reuse Plan/EIR Study Session - Questions

124

Name ARTHUR MITCHELL Phone 373-3694

Address 942 Central Dr. City P.O. Zip _____

Question: LAST FEB MAYOR STYLES COMMENTED ON
THE NOP THAT THERE SHOULD BE AN ALTERNATIVE
EVALUATED IN THE EIR, WHICH W/BE BASED UPON
AN ON-SITE SAFE YIELD OF WATER. (E. THERE
SHOULD BE NO SALTWATER INTRUSION AND NO OVERDRAFT
JUST HOW MANY FEET OF ALLOCATED
WATER WOULD THAT BE?

Gentlemen.

8/7/96

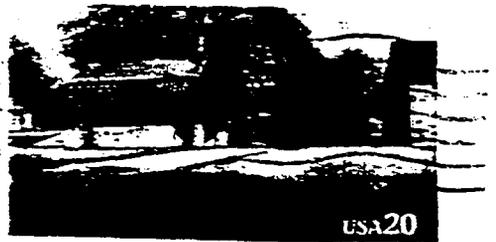
I am totally against the Fort Ord
Reuse Plan as it stands now. This will be
another city & where will the water come
from?

The traffic on the Monterey Peninsula is over-
suffic now & we will be prisoners in our
communities if the planned developments
take place. Cancel this disaster.

Yours Truly,

Dolores McGlochlin

 Dolores McGlochlin
E. Garzas Rd.
Carmel Valley, CA 93924



FORA

100 12th St. Bldg. 2880

Marina, Ca.

93933

RECEIVED
AUG 8 1996
FORA

CITY COUNCIL
 SANDRA L. (SANDY) KOFFMAN
 MAYOR
 ERT E. (BOB) OAV'S
 N YADON
 FERRENCE S. ZITO
 STEVE HONEGGER
 ROBERT HUITT
 JAMES W. (JIM) COSTELLO



CITY OF PACIFIC GROVE

300 FOREST AVENUE
 PACIFIC GROVE, CALIFORNIA 93950
 TELEPHONE (408) 648-3100
 FAX (408) 375-9863

MICHAEL W. HUSE
 CITY MANAGER
 PETER WOODRUFF
 ADMIN. SERVICES DIRECTOR
 CITY CLERK AND TREASURER
 GEORGE C. THACHER
 CITY ATTORNEY

August 8, 1996

VIA FAX - ORIGINAL TO FOLLOW VIA U.S. MAIL

Jack Barlich, Chairman
 Fort Ord Reuse Authority
 Building 2880
 100 12th Street
 Marina, California 93933

Dear Chairman Barlich:

At a regular meeting held last night the Pacific Grove City Council voted unanimously to request that the comment period on the Draft Environmental Impact Report for the proposed Reuse Plan be extended to Friday, December 13, 1996, at 5:00 p.m.

The council is in agreement with the position on this subject previously forwarded by the City of Carmel-by-the-Sea in its August 2, 1996, letter to you. In addition, the council is disturbed by some of the highly speculative "assumptions" underlying the Reuse Plan, as described during a meeting in Pacific Grove on July 31st.

Our mayor, Sandy Koffman, will, of course, be in attendance during your discussion of this request at your meeting this Friday. She will explain in more detail Pacific Grove's position and will urge FORA to extend the comment period.

Please request your staff to distribute copies of this letter to board members, ex officio board members, the FORA executive officer and involved staff. Thank you for your help.

Sincerely,

George C. Thacher
 City Attorney

cc: Mayor and Council Members
 City Manager

To: FORA

August 8, 1996

The draft EIR on the reuse of
Fort Ord is enormous, as is the project.
Please extend the deadline for
comments to Dec. 13.

Junda Smith
Sandra Smith
6 Abinante Way
Monterey, CA 93940



Established 1908

Monterey Peninsula Chamber of Commerce

Including • *Big Sur* • *Carmel-by-the-Sea* • *Carmel Valley* • *Del Rey Oaks*
• *Marina* • *Monterey* • *Pacific Grove* • *Pebble Beach* • *Sand City* • *Seaside*

To: Fort Ord Reuse Authority Board Members

From: Monterey Peninsula Chamber of Commerce

Date: August 9, 1996

Re: Extension of Public Comment Period on the Draft Reuse Plan/EIR

The Monterey Peninsula Chamber of Commerce is hereby requesting that the period for public comment on the Fort Ord Draft Reuse Plan and Draft EIR be extended beyond the current August 30th deadline. The scope and complexity of these documents demands a thorough review, which the Chamber is currently undertaking. An extension of the public comment period of one to three months by the FORA Board is a decision the Monterey Peninsula Chamber of Commerce would both support and appreciate.

P.O. Box 1770
80 Alvarado Street
Monterey, CA 93942-1770

Information: (408) 649-1770
Membership: (408) 648-5359
Administration: (408) 648-5360
FAX: (408) 649-3502



Anne Bourne
-25974 Mission St.
Carmel, California 93923

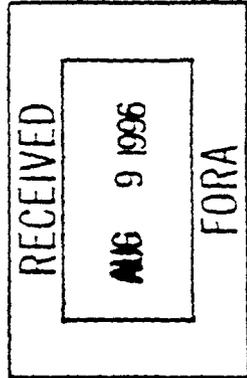
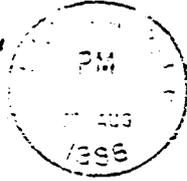
Aug. 9

Dear FORA: -

This is to ask you to please
advance the comments deadline
to Dec. 13. It's beyond com-
prehension to me why anyone in
their right mind would even
think of wanting to clutter up
that precious shoreline, much
less bring in all those hotels,
people, folk houses & water demands.
This isn't just a local issue, it
affects the entire peninsula. We
don't have the water & we should
preserve our open space even if we
did have water. We've got to stop
trying to turn land into "develop-
ment" money.

Anne Bourne

Jack Arnold
32 Live Oak Lane
Carmel Valley, Calif. 93924



FORA
100 12th ST Bldg 2880
Marina, CA. 93923

I would like to add my request
to the many other requests
that you extend the deadline
for comments and development
ideas from Aug 30 to Dec 30th.
I also would like Fort Ord
developed as a National Cemetery
for veterans, indigents and the homeless
Jack Arnold

L. BRUCE MEYER, M.D.
P. O. BOX 3782
CARMEL, CA 93921

FORA
100 12 ST, Bld 3880
Marina, CA, 93953

8/8/96

Carl Hansen:

Re: THEIR Forward

I support the extension of the date
for comments on the above to
December 1996. The impact of
the over development of Fort Ord
is critical to the Mt. Tam.

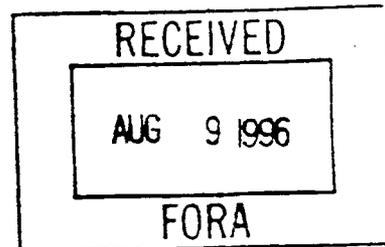
Carl Meyer

RECEIVED

AUG 9 1996

FORA

FORA
100 12th St.
Bldg. 2880
Marina, CA 93933



Dear FORA staff:

8 August, 1996

This note is to support the request of the city of Carmel to extend the deadline for comments on the DEIR until December 13.

I make this request with extensive knowledge of the difficulty and scope of your work. I was one of the first five members of the Fort Ord Base Closure Office where I worked from 1991 until my retirement in 1994.

It is precisely because of the complexity and importance of your work, that it must be thoroughly understood by area leadership. From my conversations with many of them, the scope and meaning of the DEIR is NOT understood. Wading through a DEIR is too difficult for most people. I would suggest, if you can find the money, that you cover the key controversial points of the DEIR in a 5-10 minute local TV spot. You will certainly reach far more people ... and show a great deal of good will.

Whatever you do I predict that the locals are going to cry like stuck pigs when they finally realize the monumental impact of the Plan on traffic, water, the environment, etc., etc. You would be wise to try and defuse some of that reaction now.

Sincerely,

A handwritten signature in cursive script that reads "Mel Spehn".

Dr. Mel R. Spehn
P.O. Box 2437
Carmel Valley, CA 93924

MINUTES
Fort Ord Reuse Authority (FORA)
August 9, 1996
4:00 PM
12th Street Gate
Marina, CA

The meeting of the Fort Ord Reuse Authority was called to order by Chair Barlich on Friday, August 9, 1996 at 4:00 PM in the FORA Conference Room, at the 12th Street Gate, Marina, CA.

1. ATTENDANCE

Voting Members in attendance were: Mayor Vocelka, Councilmember Perrine, MARINA; 2nd Vice Chair Mayor Jordan, Councilmember Rucker, SEASIDE; Mayor Albert, MONTEREY; Mayor Styles, SALINAS; Mayor Pro Tem Lewis, SAND CITY; Mayor White, CARMEL; Mayor Koffman, PACIFIC GROVE; Councilmember Russell, DEL REY OAKS

Ex-Officio Members in attendance were: Donna Blitzer, 17th CONGRESSIONAL DISTRICT; Charles Van Meter, MONTEREY PENINSULA UNIFIED SCHOOL DISTRICT; Lora Martin, UNIVERSITY OF CALIFORNIA; Hank Hendrickson, CALIFORNIA STATE UNIVERSITY; COL Mettee-McCutchon, US ARMY; Dr. Ed Gould, MONTEREY PENINSULA COLLEGE; Doran Barnes, MONTEREY SALINAS TRANSIT

2. APPROVAL OF CONSENT AGENDAS

Boardmember Perrine moved approval of the consent agenda, Mayor Vocelka seconded, it passed unanimously.

3. PUBLIC COMMENT PERIOD

Winston Elstob from Pacific Grove read a statement which was printed in the Herald.

Gerald Townsend from Santa Cruz requested a national cemetery at Fort Ord.

Shirley Humann from Carmel would like to see some hard numbers to justify the economic development at Fort Ord. Each member agency should provide economic information for the fiscal year preceding the closure. *see # 138*

Pete Leonarich from Salinas also gave his support for a national cemetery at Fort Ord.

133 Linda Anderson mentioned a scoping report from the City of Salinas asking that the EIR include a project alternative for use of on-site safe yield water.

Bill Woodworth reminded the Board there is still not a water conservation plan.

134 Laurence Dickey commented the DEIR is incomplete and inadequate for a variety of reasons.

135 Harvey Kuffner supports the previous speakers.

Debra Mickelson asked for additional time for review of the DEIR and read a letter. (attached) Valerio Biondo continued to read the letter from Debra Mickelson.

see #139

136 Mark Christensen from Carmel commented on the size of the Fort Ord project and the funding aspect on the sale of the land. He asked for an extension of the DEIR.

137 Sue Hawthorne from Seaside agreed with Mr. Christensen.

ANNOUNCEMENTS:

Les White acknowledged Kathy Poncy from FORA staff who will be leaving FORA at the end of August to live in Dallas.

NEW BUSINESS

ITEM 4A - PROPOSED FEDERAL LISTING OF THE BLACK LEGLESS LIZARD

Les White introduced this report. Michael Zander gave background information on this issue. Three main points he covered were: (1) it is clear that the species exists more widely in its range than previously thought. (2) Fort Ord sets aside some large acreage for habitat for this animal; and (3) there are studies underway to determine the number of lizards on the base. For those reasons we need to request Fish/Wildlife (F/W) consider the above points before listing this species.

Boardmember Perrine asked if the time limit for this study is twelve months. Mr. Zander was not sure the actual time for the count as the cover boards for counting the lizard were just put out and they should sit over the winter and early spring.

Mayor Vocelka asked if it would be better to put a minimum of 12 months to conduct the study. Mr. Zander agreed.

133, 134, 135, 136, 137
2

August 9, 1996

TO: FORA Board

If the Fort Ord Reuse Authority (FORA) is going to use "economic recovery" as an excuse to implement their proposed huge plan, the public deserves to see some hard numbers. After all, full disclosure is a basic component of CEQA.

The FORA consultants should ask each member (8 cities plus the county) to provide economic information for the fiscal year preceding the closure of Fort Ord and for the most recent fiscal year in order to prove/disprove the stated need for "economic recovery". This data, with verifiable sources for the information, should include: City/County general budget; sales tax; number of employed/unemployed; school enrollment. For perspective, the City of Watsonville (a city of 30,000 people) should be used as the control group.

The above information should be made available at the September FORA meeting and should be included in a revised draft EIR. Without this information any attempt to use "economic recovery" as an overriding consideration could seriously subject the document to a challenge.


Shirley Humann

Carmel, Calif.

August 9, 1996

Verbal Presentation
Regular FORA Board Mtg. - 4 pm

Fort Ord Reuse Authority
100-12th Street, Bldg. 2880
Marina, CA 93922

Re: 5/31/96 Fort Ord Reuse Plan Draft Environmental Impact Report
Need for Extension of Public Comment Period Beyond 30 August
Need for a Revised Draft Environmental Impact Report

To the FORA Board:

The purpose of this letter is to emphasize the need for additional time to review the Fort Ord Reuse Plan Draft Environmental Impact Report and to request that the FORA board begin to consider the need for the preparation of a revised draft EIR. The public, FORA board members, and other interested parties have had insufficient time to digest the complex issues presented by, and partially analyzed in, the current draft EIR.

The California Environmental Quality Act mandates full disclosure of the impacts of a proposed project. The project is defined as the whole of an action. CEQA requires selection and discussion of a reasonable range of feasible alternatives. The current draft EIR is inadequate and the fatal flaws are severe. The inadequacies cannot be remedied in a final EIR because the draft fails to present substantive information regarding the environmental impacts of, e.g., the water systems and needed road improvements that are required by this project. In addition, the draft EIR fails to provide a reasonable range of feasible alternatives because the alternatives cannot meet the requirements set forth in SB 899.

How soon will FORA board members determine the legal need for a revised draft environmental impact report?

Somewhat detailed questions were asked about the water issue at the August 7th meeting held by FORA staff and consultants. Similar questions, with similar detail, illustrating similar DEIR inadequacies can be asked at future hearings, with the FORA board members present, about the following CEQA issues.

Please keep in mind the absolute requirement under CEQA to provide adequate analysis of the whole project with all its component parts. The public needs more information about:

- "Accommodating regional growth" as a project objective
- "Aggregate totals", "not to exceed envelopes"
- Asbestos and lead - timing and responsibility of remediation
- CEQA - inadequacy of the 5/31/96 DEIR
- CSUMB - when is their master plan complete? Include in revised DEIR
- Cal Trans - needs an alternate Hwy 68 easement
- Coastal Commission Consistency
- Demolition costs - no accurate estimates
- Density limits - lack of reasonable limits
- "Economic/job recovery" as a project objective
- FORA's "urban design guidelines" - needed in a revised draft EIR
- Growth inducing - the 5/31/96 DEIR project
- Growth projections - DEIR's 2.61%/year vs. AMBAG's 0.9% vs. 0.5% historic
- Height limits - lack of
- Hotel rooms in planning stages in Monterey Bay area - accurate data omitted

139-1

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information needed continued:

- Inadequate baseline data 19
- Inclusionary housing - DEIR's use of "zones" for "group homes" 20
- Internal inconsistencies 21
- Land sales - no constraints 22
- Land use - DEIR project uses 10,000 acres; Army built on 5,000 acres 23
- Landfill - toxic site/proposed for golf course/water retention area 24
- Mitigation measures - should not be confused with the project 25
- Newly excessed parcels 26
- "No project alternative" - in DEIR - 34,400 person city needs 9,400 AF water 27
- POM - Presidio of Monterey Annex - moving it/at what expense 28
- Phasing - lack of 29
- "Planned Development Mixed Use District" - the pink polygons 30
- "Policies and Programs" - not legally enforceable 31
- Program EIR - the misuse of 32
- Project Alternatives - lack of feasible/reasonable 33
- Reasonably Foreseeable Future Projects in the project area - omitted data 34
- Recycled wastewater - use of 35
- SB 899 - importance of 36
- School siting (K-12) 37
- Seismic - e.g., Reservation Road corridor/polygon #24/sand dune desal plant 38
- Shared revenue stream 39
- Spheres of influence - peculiarities and conflicts 40
- Stable, finite project description - lacking 41
- Stormwater runoff - lack of characterization/dune outfalls pipelines 42
- The Threat: Army will sell land to anyone without a local reuse plan in place 43
- Toxics 44
- Traffic - lack of environmental assessment of project impacts 45
- UC - indistinguishable on reuse map/when is master plan ready/include in DEIR 46
- UXO 47
- Undevelopable acres 48
- Wastewater treatment capacity - lack of/no environmental assessment 49
- Water - no DEIR environmental analysis of, e.g., "importation of water" and "desalinization" 50

It's critically important for FORA to make informed decisions on the public's behalf. Please grant the additional time extension and begin to consider the need for a revised draft EIR for the Fort Ord Reuse Plan as required by SB 899.

Sincerely,

Debra J Mickelson

Debra Mickelson
P.O. Box 7591
Carmel, CA 93921
408-624-8755

cc: CAWS
Grower-Shipper Vegetable Assoc.
Rancho Buena Vista Coalition
Restoration Advisory Board
Sierra Club Ventana Chapter

August 9, 1996

FORA Board

The City of Salinas, a FORA member, in its February 1996 scoping comments, requested that the Draft Environmental Impact Report (DEIR) for Fort Ord include a project alternative designed to use only on-site, safe-yield water. Nothing wrong with that. It's not only a reasonable request, it is mandated by the California Environmental Quality Act (CEQA) which calls for projects to have a reasonable range of alternatives. CEQA further requires that an alternative be designed which would reduce the significant impacts of the project.

The DEIR fails to provide this basic function of CEQA and, therefore, is inadequate. A revised draft EIR must be prepared as per the project alternative requested by the City of Salinas. And this project alternative must be fully defined and analyzed as directed by Senate Bill 899.



Jean B. Mitchell

P. O. BOX 5777, CARMEL-BY-THE-SEA, CA 93921

FORA

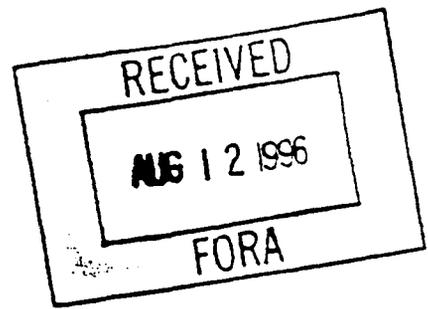
August 10, 1996

Please extend the public comment period
re: FORA to the end of the year.

We must study such an enormously important
project from every aspect. It could increase
our water and waste water concerns, and
surely would affect the quality of life on
the Monterey Peninsula and in Carmel.

Yours truly,

Mr & Mrs. William F Mitchell
Carmel



TO: FORA Board Members and Consultants
FROM: Melanie Billig, Carmel, Ca. *MS*
RE: DEIR on the Proposed Fort Ord Reuse Plan

The following are my comments on the adequacy of the Draft EIR:

1. The Economic Analysis is based on the assumption that the Peninsula has suffered a severe economic dislocation as a result of the base closure.

- The DEIR does not prove this.
- The DEIR does not take into account the severe statewide recession/depression that occurred at the time of base closure and has continued until recently.
- The Fort Ord Reuse Plan Administrative Draft Vol. I, p. 222-9 to p. 2-7 in fact contradicts this as do numerous studies and articles referenced in the Monterey Herald newspaper over the last 4 years.
- The DEIR is not objective in this matter since it seems to promote this inaccurate notion in order to support the need for this plan and the tremendous economic development being proposed.
- The Panetta Task Force and SB899 only addressed job loss and prevention of possible economic dislocation, not the promotion of intense long term regional growth. "Economic advance at the expense of the environment will not be tolerated." This is what the the DEIR is proposing?
- The scale of growth and development being proposed flies in the face of what the Task Force and State legislation envisioned.

2. A "program" DEIR approach is too general and lacks sufficient detail to allow for intelligent and informed decision-making, particularly in the following areas of significant impacts and mitigation measures:

- water supply both usage on and off base, especially for the future
- waste water treatment capacity and disposal on and off the base
- public safety on and off the base
- traffic and circulation on and off the base
- air quality
- water quality
- marine sanctuary and dunes

The "program EIR" allows these major issues to be deferred to a later date. How is FORA and the public to understand and respond to impacts? The document is so general that it can be stretched to cover whatever future projects other agencies choose and thereby leave the public out of the review and decision making process. For this reason this document must be more detailed and specific in the aforementioned areas.

3. Need a "Viable" and realistic alternative project that is consistent with demonstrated available natural resources, infrastructure and economic resources.

7

- The DEIR is seriously flawed in its discussion of water supply (both current and future sources)
- The details of how these above 3 issues are to be dealt with are inadequate for informed decision-making.
- An alternative project added as an addendum to this Draft is inappropriate and not legal because it does not allow for public review and comment as required by CEQA.
- Note the letter from the City of Salinas regarding these matters.

4. Areas of "Known Controversy" need to be more thoroughly acknowledged and discussed, i.e.:

8

- Water supply-current and future sources
- aesthetics & viewsheds
- level of impact of development on the east side of 101, on the west side of 101
- traffic and circulation mitigations
- growth
- degree or level of economic development

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5. "Cumulative Impacts" of the proposal are not adequately discussed as required by CEQA.

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6. This DEIR and the rush for its approval is being driven by the desire of agencies to obtain land in order to sell it to private developers. The implications and impacts of the creation of many legal lots of record is not adequately addressed.

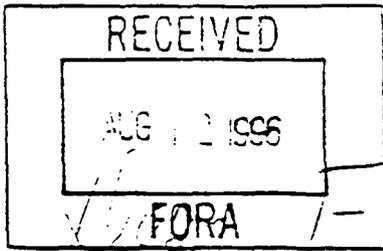
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7. The lack of a detailed "Executive Summary" to provide the public with an accurate and complete review of the proposed project is a serious flaw in the CEQA process. The information being distributed is not adequate and not even widely available.

16

The DEIR itself is of such a size that review and understanding is difficult because of the lack of copies and lack of easy availability. This also would seem to violate the intent of CEQA.

17



8-9-96

Donald & Mary Sweeney
618 Forest Avenue Apt. B
Pacific Grove CA 93950
(408)646-0948

My Concerns:

Where can we find
another 18000 acre feet of
water?

Can the peninsula
stand a 57% increase
in population?

I support the effort to
extend the deadline for
comments on these issues
until at least December 1996

Donald Sweeney

FORA
100 12th St. Bldg 2880
Marina, CA 93933

Dear People:

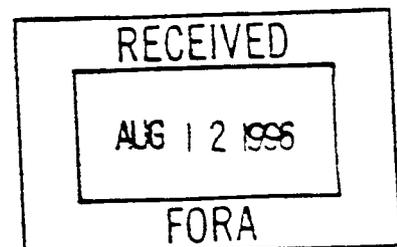
You are moving too fast with your proposal for reuse of Ft. Ord. The DEIR describes projects, land uses, developments, etc. that deserve much more intensive public scrutiny, as well as answers to questions posed but not yet answered. Putting aside citizen scepticism about the gargantuan size of the plan, how can any of it proceed until the water for it is available? Answer that question first and than ask for its acceptance.

Specifically, please extend the deadline for comments and public respose to the DEIR until December.

A Long-time Monterey Resident Asking,



WAYNE ROSENOFF
101 SHADY LN.
MONTEREY, CA 93940



rec'd Aug 12?

MISSY READ 4060 Ronda Rd. Pebble Beach, CA 93953

It is imperative that the public have time to study and comment on the Draft EIR. Please extend the deadline to Dec. 13.

Missy Read

Aug 9 '96

FORA

Marina, CA

Gentlemen:

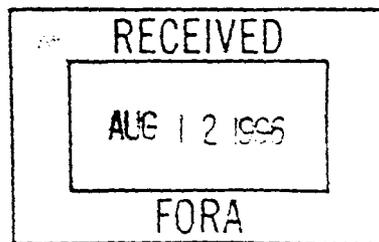
I would very much appreciate it if you would extend the deadline for Draft EIR comments to Dec. 13, '96.

Like many of my friends, I need more time to fully inform myself on the matter.

Thank you for extending this courtesy to the public.

Evelyn Larson

501 Casanova Ave
Monterey, CA 93940

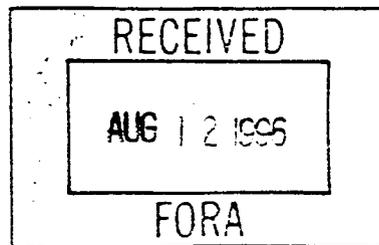


Mrs. William L. Wright
3405 Trevis Way
Carmel, California 93923

-CRA-

Please extend deadline
for comments to Dec.

Money Wright



MINUTES
SPECIAL JOINT MEETING, MARINA CITY COUNCIL
AND MARINA PLANNING COMMISSION
Marina City Council Chambers
Monday, August 12, 1996

1. CALL TO ORDER AT 7:00 P.M. BY MAYOR JAMES VOCELKA & PLANNING COMMISSION CHAIRMAN DAN BELLEM.
2. ROLL CALL & ESTABLISHMENT OF QUORUM
CITY COUNCIL PRESENT: Council Members Howard Gustafson, Jim Perrine, John Wilmot, Mayor Pro Tem Loyde Yates and Mayor James Vocelka.

PLANNING COMMISSIONS PRESENT: Commissioners Harry Allen (arrived 7:04 p.m.), Robert Graham, Grace Silva-Santella, Paul Vierling, Vice Chairman Tim Quick, and Chairman Dan Bellem.

PLANNING COMMISSIONERS ABSENT: Robert McCaffrey (excused)

3. PLEDGE OF ALLEGIANCE
4. COMMUNICATIONS FROM THE FLOOR - NONE RECEIVED
Anyone wishing to address the Council on city business not on the Agenda may do so at this time. Please limit your comments to three minutes.
5. OTHER AGENDA ITEMS
 - (a) COMMUNITY MEETING regarding Fort Ord Reuse Authority proposed Fort Ord Reuse Plan and Draft Environmental Impact Report.

History and issues of Fort Ord Reuse by City Manager John Longley: (1) Service provision and cost implications; (2) implication over 20 years; and (3) Marina's development priorities.

Summary by Planning Director Jeff Dack; input from Public Works Manager Lee Yarborough; input from FORA Executive Officer Les White..

Mayor opened floor for public comment:

- 148 (1) Alyce Rider, 612 St. George Drive, Salinas 93905, regarding housing at Cypress Knolls and other housing development, focusing on support for vocational services.
- 149 (2) Phil Nash, MPC Dean of Instruction, regarding MPC at Marina to excel in occupational training.
- 150 (3) Patti Bradshaw, Flower Circle, supports keeping same large lots at Fort Ord as in Marina.

148, 149, 150

Joint City Council & Planning Commission Meeting MINUTES

August 12, 1996

Page 2

- 151 (4) Tom Moore, President, Marina Coast Water District, willing to respond to any water issues; and as a citizen, expressed concern about 20-year plan - infrastructure will be needed that will be expensive and may need to scale down.

Discussion and comments by members of Council and Planning Commission regarding environmental issues, trees, water & utilities, traffic/transportation, habitat management, infrastructure, public safety (police & fire) needs, housing density and flexibility, capital improvement project priorities, park facilities,

Commissioner Silva-Santella requested "for the record" that "with MPWMD has to vote on desalination and I think it has not been voted on for two reasons - a lot of people are connecting it with development and a lot of people just don't want to pay the cost of that water. We need to understand that why the Marina Coast Water District should have to take over this water/utility, it would not have be voted in. It could just be something that would just happen as long as the cost is approved."

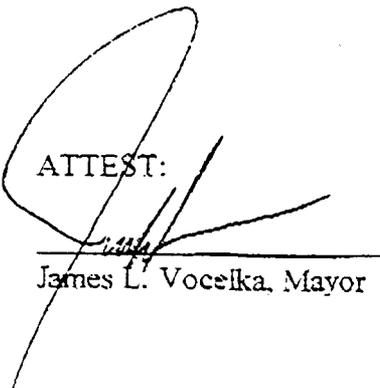
Additional public comment received:

- (1) Elizabeth Hood, new resident of one week, expressed concern over Public Safety needs and inquired as to how Public Safety will be funded with Fort Ord in the future.

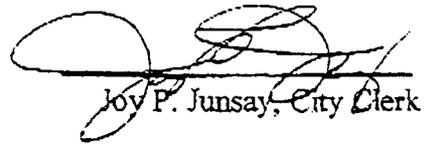
Planning Director will compile comments and specify in a letter to be submitted prior to the end of the month to FORA.

6. ADJOURNMENT AT 9:35 P.M.

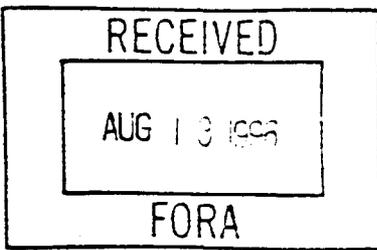
ATTEST:



James L. Voceelka, Mayor



Joy P. Junsay, City Clerk



ROBERT GREENWOOD
Mineral Resources Geologist

3240 El Camino Estrada
Carmel, California 93923
(408) 625-5316

Calif Reg Geologist No 1100

August 10, 1996

Fort Ord Reuse Authority
100 12th St., Bldg 2880,
Marina, CA 93933

Dear Sirs:

These are my comments and suggestions regarding the Draft EIR for the Reuse Plan, with particular emphasis on water supplies.

1. "6,600 AF of water is currently available" (Overview, p.4).
Is this quantity derived entirely from wells on-site?
On what basis is it judged to be a reliable "safe yield"?
2. How much water will be required for the properties which have "already been directly conveyed" (Overview, p.2) ?
3. Table 2.4.2 of the DEIR proposes 18,262 AF of "new local water supplies". This figure is totally unrealistic to anyone who understands the long-term and continuing water problems which confront this region. The Monterey Peninsula continues to suffer unacceptable environmental damage at our present level of water usage, and the lower Salinas Valley is threatened by salt-water intrusion.
The financing proposals for new water supplies (Overview, p.9-10) are dubious and untested.

I strongly recommend (as I believe the City of Salinas has already done) that an additional Project Alternative be prepared, with development relying entirely on the safe yield of presently known water supplies on-site at Fort Ord. When such development is completed and functioning, we shall have a better opportunity to evaluate the water situation of the entire region, and to reconsider the desirability of additional development.

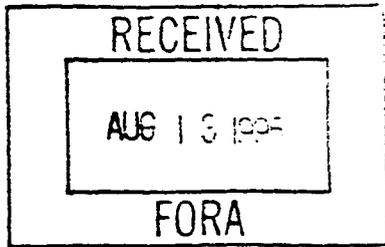
4. According to p.2-1 of the DEIR, FORA is required to "minimize the disruption caused by the base's closure on the civilian economy...". It is my understanding that the economic losses have been much less than anticipated. The DEIR needs to include an updated comparison between employment levels, tax revenues etc., before the base closed and those prevailing today. Without such information, we cannot calculate how much "disruption" needs to be compensated.

Sincerely,

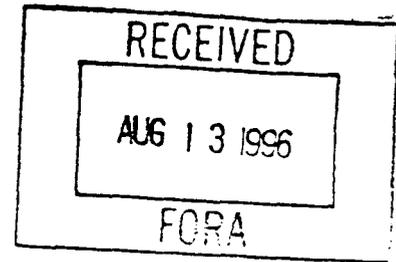
I am responding to the article written by Linda Anderson and published in the West. Herald Letter Box 8/8/96. Ms Anderson listed 10 areas of concern in her article and I strongly concur on all 10 items.

Consider this support for Council's request for an extension of the deadline for comments on the DEIR on reuse of Fort Ord from August 30, 1996 to Dec 31, 1996

Thank you,



Joan Noice Elms
8323 Solon Place
Castroville, Ca
95012
408-633-2400



August 12, 1996

Les White, Executive Officer
Fort Ord Reuse Authority
100 Twelfth Street
Marina, CA 93933

Re: Draft Fort Ord Reuse Plan

Dear Mr. White:

Thank you for the opportunity to review the Draft of the Fort Ord Reuse Plan. We appreciate the opportunity to review and comment on this important document. We have identified three major issues related to the Reuse Plan: incorrect identification of transit facilities, lack of financial planning for on-base transit services and lack of any planning for regional transit services. In addition, we have some general comments about the Draft Plan. Each of these issues is discussed below.

Transit Facilities. In May of 1996, I wrote to you and indicated that the specific locations of the various transit facilities which MST anticipates developing at Fort Ord are not correctly identified in either the text or maps of the Administrative Draft of the Reuse Plan. I requested that that this information be corrected.

The current draft of the Reuse Plan continues to have inaccurate information related to MST's transit facilities. We understand that there was not enough time to make the appropriate corrections before the public draft of the Reuse Plan was released. However, it is critical that subsequent versions of the Reuse Plan correctly identify these facilities.

Financial Planning for On-Base Transit Services. We are delighted that the Reuse Plan² embraces transit-oriented and pedestrian-oriented design concepts. By carefully applying these planning concepts, a new community at Fort Ord can be created which provides a wide variety of transportation options and is not dominated by the single-occupant automobile. Successful transit-oriented development can decrease traffic, reduce the space needed for parking, increase pedestrian traffic, provide greater mobility for citizens, and reduce air pollution.

However, in order for transit-oriented development to work most effectively, adequate levels of transit service must be provided. Unfortunately, the planning process fails to address this critical issue. As I have indicated in prior correspondence, MST believes that the issue of funding transit services must be fully addressed in the Public Services Plan. If adequate levels of transit

154-1

service can not be provided due to a lack of available funding, the transit-oriented and pedestrian-oriented concepts identified in the Plan will not be achieved. 2

During the next three to five years, MST could incur additional cuts in federal funding. Our federal funding was cut by 25 percent in fiscal year 1996 and similar cuts are expected to continue for the next several fiscal years. We expect that growth in the local transportation fund, MST's primary funding source, will off-set the cuts in federal funds. However, we will not be able to expand services during the next three to five years as Fort Ord reuse occurs.

Without additional funding, MST will be faced with the following choices, neither of which is particularly attractive.

- ◆ Not serving major portions of Fort Ord as reuse occurs
- OR-
- ◆ Reducing or eliminating existing MST services and reallocating resources to serve Fort Ord.

We have prepared preliminary projections of the level of transit service that should be provided within Fort Ord as reuse occurs. We provided this information to Ann Hebenstreit of your staff on February 8, 1996. A copy of this letter is attached. We believe that these assumptions are still valid and request that they be incorporated into the Public Services Plan.

Regional Transit Planning. The Public Facilities Implementation Plan (PFIP) identifies numerous transportation improvements which are required within the boundaries of former Fort Ord. We are very pleased that the PFIP includes MST's Intermodal Transportation Center, two Park & Ride Facilities and the acquisition of buses to provide on-base transit service. The PFIP also identifies a number of regional road improvements and assigns a portion of the cost of these improvements to the reuse of Fort Ord. However, the PFIP fails to address transit service needs in a similar manner. 3

MST has identified a number of deficiencies in our service area. These deficiencies are documented in our Short Range Transit Plan. Many of these are related to providing service to and from Fort Ord, and are summarized in the table attached to this letter. Similar to the treatment of roads, these deficiencies should be identified in the PFIP and a portion of these deficiencies should be assigned to Fort Ord. Furthermore, a portion of the operating cost for these deficiencies should be included in the Public Services Plan, as shown in the attached table.

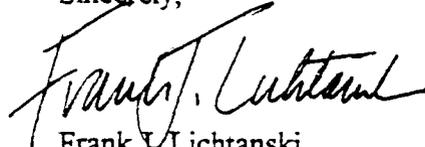
Please note the life of a transit coach is twelve years. Accordingly, replacement coaches must be programmed into the capital improvement plan as appropriate.

Other Comments on the draft Fort Ord Reuse Plan. We have reviewed the Reuse Plan in detail. We have identified a number of issues related to the plan. These comments are attached for your consideration. ↓

Les White
August 12, 1996
Page 3

Thank you for the opportunity to review and comment on the draft Fort Ord Reuse Plan. We would be pleased to work with you to address the issues we have presented in this letter. If you have any questions about our comments or if we can be of any assistance in addressing these outstanding issues, please call me at 899-2558 or Doran Barnes, MST's Planning Manager at 393-8129.

Sincerely,



Frank J. Lichtanski
General Manager

DJB:sb

cc: J. Barlich, FORA
G. Gromko, TAMC
N. Papadakis, AMBAG
J. Longley, City of Marina
T. Brown, City of Seaside
V. Ferguson, County of Monterey
J. Kersnar, City of Carmel-by-the Sea
S. Endsley, City of Del Rey Oaks
F. Meurer, City of Monterey
M. Huse, City of Pacific Grove
D. Mora, City of Salinas
K. Morgan, City of Sand City
D. Salazar, CSUMB
L. Martin, UCSC
MST Board of Directors

**Monterey-Salinas Transit's
Specific Comments on the
Fort Ord Reuse Plan**

- *Transit Service and Facilities* (page 3-74) The current discussion of transit service and facilities provides little information about the future transit system serving Fort Ord reuse might include. In the discussion of streets and roads, specific improvements and their purposes are described in substantial detail. A similar level of detail is not provided in the transit discussion. 4

We recommend that the plan discuss current transit routes and provide some general concepts of how future routes might be implemented. This should be based on linking the various "villages" that are described in the plan.

- *Park & Ride Lots* (page 3-75) The discussion of Park & Ride Lots should specifically identify the two locations where MST plans to develop Park & Ride Lots. These include a Park & Ride Facility at the Southeast corner of Imjin Road and Twelfth Street; and a Park & Ride Facility at the Northeast corner of Gigling Road and Eighth Ave. Additional Park & Rides Lots should be developed throughout Fort Ord where appropriate. 5

- *Parking Management* (page 3-76). The plan discusses parking management, but fails to fully endorse the concept. We recommend that you strengthen the language to indicate that parking management *will be implemented* as part of the reuse of Fort Ord. 6

- *Existing City of Marina Neighborhood Areas* (page 3-103). One of the design objectives for this area should be to: "Promote the use of the Park & Ride Facility which is planned for development at the corner of Imjin Road and 12th Street." 7

- *City of Marina Town Center* (page 3-108) One of the design objectives for this area should be to: "Create uses which encourage the use of and compliment the Fort Ord Transportation Center at First Ave. and Fifth Street." 8

- *CSUMB Planning Area* (page 3-118). An additional design objective for this area should be to: "Encourage the use of alternate transportation by providing convenient and direct transit access to campus activity centers." 9

- *University Village District* (page 3-123) One of the design objectives for this area should be to: "Promote the use of the Park & Ride Facility which is planned for development at the corner of Gigling Road and Eighth Ave." 10

- Phasing Scenarios* (page 3-149) One of the phasing factors identified on page 3-149 is circulation. The text indicates that "roadway improvements" are reviewed in phasing scenarios. We strongly believe that circulation involves more than just an analysis of roadway improvements. In some cases transit improvements and/or transportation demand management strategies may provide increased circulation at a lower cost than roadway improvements. Accordingly, we request that you change the discussion on this page to reflect a balanced review of all circulation components. More importantly, we encourage you to reflect this more balanced approach to evaluating circulation in the phasing scenarios which have or will be prepared. 11

- Circulation Strategy* (page 3-150). Following on our prior comment, the discussion of circulation on page 3-150 is really a discussion of roads. We encourage you to expand this discussion to include a more comprehensive discussion of all circulation issues. 12

- City of Marina Residential Land Use* (page 4-31). We recommend that you add the following program under policy E: Program E-1.4 The City of Marina shall encourage the development of an integrated street pattern for new developments which provides linkages to the existing street network and discourages cul-de-sac's or dead-end streets. 13

- City of Seaside Residential Land Use* (page 4-36). We suggest that you add the following program under policy E: Program E-1.3 The City of Seaside shall encourage the development of an integrated street pattern for new developments which provides linkages to the existing street network and discourages cul-de-sac's or dead-end streets. 14

- County of Monterey Residential Land Use* (page 4-41). We recommend that you add the following program under policy E: Program E-1.3 The County of Monterey shall encourage the development of an integrated street pattern for new developments which provides linkages to the existing street network and discourages cul-de-sac's or dead-end streets. 15

- City of Marina Commercial Land Use* (page 4-52) We suggest that you add the following program under policy E: Program E-1.2 The City of Marina shall allow increased densities of up to ten percent for projects which promote the use of alternate transportation as evidenced by the inclusion of some or all of the following: provision of bus turn-outs; provision of bus shelters; provision of bicycle lockers, secure bicycle racks, and showers/changing areas; development and implementation of employee trip reduction programs. 16

- City of Seaside Commercial Land Use* (page 4-55) We suggest that you add the following program under policy E: Program E-1.2 The City of Seaside shall allow increased densities of up to ten percent for projects which promote the use of alternate transportation as evidenced by the inclusion of some or all of the following: provision of bus turn-outs; provision of bus shelters; provision of bicycle lockers, secure bicycle racks, ✓ 17

and showers/changing areas; development and implementation of employee trip reduction programs.

County of Monterey Commercial Land Use (page 4-59) We suggest that you add the following program under policy E: Program E-1.2 The City of Marina shall allow increased densities of up to ten percent for projects which promote the use of alternate transportation as evidenced by the inclusion of some or all of the following: provision of bus turn-outs; provision of bus shelters; provision of bicycle lockers, secure bicycle racks, and showers/changing areas; development and implementation of employee trip reduction programs. 18

Existing Transit Conditions (page 4-103) Please note that the RIDES Paratransit program currently provides service from 7:00 a.m. until 11:00 p.m.; not from 10:00 a.m. until 2:00 p.m. as stated in the plan. 19

Transit Activity Centers and Corridors (page 4-110). Like many of the maps in the reuse plan, Figure 4.2-5 incorrectly shows the Intermodal Transit Center at First Ave and Eighth Street. The actual location of this facility is at First Ave. and Fifth Street. Furthermore, the Park & Ride Facility at Imjin Road and Twelfth Street and the Park & Ride Facility at Eighth Ave. and Gigling Road are not identified in the map. These facilities should be correctly identified in this figure and all other maps in the Plan. 20

Figure 4.2-5 also shows only two activity centers at Fort Ord: MBEST and CSUMB. While these most likely will be the largest activity centers, there are many other activity centers which transit can and should serve, including: the Marina Town Center, the POM Annex, the Seaside Entertainment Center, and the Del Rey Oaks office/hotel development. These activity centers also should be noted in Figure 4.2-5. Furthermore, the residential areas should receive appropriate levels of the transit service. These areas should be identified in this figure. 21

In addition to the key transit corridors shown in Figure 4.2-5, the following roads should be shown as a key transit corridors: First Ave.; Gigling Road between North-South Road and Eighth Ave.; Monterey Road, Reservation Road between Del Monte Blvd. and Blanco Road; and Intergarrison Road between the main CSUMB Campus and the CSUMB housing area. 22

Transit Support (page 4-111). Under the discussion of Transit Policies and Programs, Program A-1.1 indicates that each jurisdiction will "support MST to provide service responsive to local needs." Similar language related to paratransit services is shown for Program A-1.3. Please clarify if this is financial support or moral support. If this policy is limited to moral support and funding for transit operations and capital is not provided, MST will be unable to serve the activity centers, corridors and bus stop facilities identified in the programs which support this policy. 23



August 12, 1996

Les White, Executive Officer
Fort Ord Reuse Authority
100 Twelfth Street
Marina, CA 93933

Re: Draft Fort Ord Reuse Plan
Environmental Impact Report

Dear Mr. White:

Thank you for the opportunity to review the Draft Environmental Impact Report (EIR) for the Fort Ord Reuse Plan. We appreciate the opportunity to review and comment on this important document. We are concerned that the Draft EIR assumes that transit will provide mitigations, but provides no funding to pay for necessary transit services. We believe that this is a major deficiency in the Draft Fort Ord Reuse Plan and in the Draft EIR. Our specific comments on the Draft EIR are provided below:

Transit Mitigation Measures. We are most disappointed that the increase in travel demand on the Regional Transportation System is listed as an unavoidable significant impact. We strongly believe that transit can and should have a mitigating impact in reducing congestion on the regional transportation system as the reuse of Fort Ord occurs. We request that the detailed analysis of transportation impacts and the Summary Table of Proposed Project Impacts (Table 2.5-1) clarify the role that transit and alternative transportation will play in mitigating the impacts on the regional transportation system. The detailed analysis would identify the transportation corridors which will be served by transit, the service frequency on these corridors should be stated, and the funding source to provide transit these services should be identified. Furthermore, all of these transit mitigations should be included in the mitigation monitoring program. 24

Regional Mode Split Assumptions. The discussion of impacts to the regional transportation system (page 4-83) indicates that the current mode choice was used to project vehicle trips. We believe that this is not a reasonable assumption, unless funding will be provided to allow expansion of transit services at the same rate overall as vehicle trips increase. 25

Internal Transit Service. The discussion of increased travel demand within former Fort Ord (page 4-87) states, "The roadway network would form the backbone of the internal transportation system, but it is important to acknowledge the role of transit, non-motorized modes of transportation, and transportation demand management in mitigating the impacts on the 26

154-7

internal system and minimizing infrastructure requirements.” We agree. However, the Draft EIR and the Draft Fort Ord Reuse Plan both fail to identify how transit service to Fort Ord will be funded. Without a secure funding source for both transit operations and capital improvement, transit will not be able to deliver the mitigations that are suggested in the Draft EIR.

Transit Policies. The Draft EIR references Transit Policy A-1 in the Draft Fort Ord Reuse Plan on page 4-84. This policy and its supporting programs focus on “coordinating” with MST in identifying activity centers and transportation corridors, and providing transit facilities. We support this policy. However, these coordinating efforts will mitigate transportation impacts *only* if funding is available to provide transit services. 27

Infrastructure Improvement Summary. Table 4.7.2 identifies proposed transportation capital improvements. The table includes improvements to roads within the former Fort Ord and to regional roads. The table also identifies transit capital improvements for transit services within Fort Ord. However, this table fails to identify regional transit capital improvements. The following table shows the regional transit improvements which should be included in table 4.7-2: 28

Regional Transit Capital Improvements

<i>Capital Improvements</i>	Capital Cost for Bus Acquisition	Percentage Allocated to Fort Ord	Capital Cost Allocated to Fort Ord
	(000)		(000)
<i>Route Coverage</i>			
One bus for service to Hidden Hills, Laguna Seca, San Benancio and Corral de Tierra along Highway 68	\$330	20%	\$66
One bus for developments along Highway 156 between Castroville and Prunedale	330	30%	99
Monterey Peninsula Airport and Laguna Seca on Sundays	0	20%	0
Two buses for direct Service Monterey-Watsonville	660	40%	264
Two buses for direct Service Monterey to San Benite County	660	30%	198
<i>Service Hours</i>			
Earlier Weekend Service	0	20%	0
<i>Service Frequencies</i>			
Two buses for additional service on Line 20-Salinas-Monterey	660	40%	264
Two buses for additional service on Line 21-Salinas Monterey	660	20%	132
<i>Facilities</i>			
Operations and Maintenance Facility	15,000	33%	5,000
TOTAL	\$18,300		\$6,023

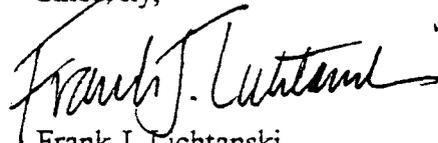
Please note the life of a transit coach is twelve years. Accordingly, replacement coaches must be programmed into the capital improvement plan as appropriate. 29

Transit Activity Centers and Corridors. Figure 4.7-2 shows the proposed 2015 Road Network and figure 4.7-3 shows the proposed road network at buildout. The plan fails to provide a similar figure showing the proposed transit network. 130

□ □ □

Thank you for the opportunity to review and comment on the draft Fort Ord Reuse Plan. We would be pleased to work with you to address the issues we have presented in this letter. If you have any questions about our comments or if we can be of any assistance in addressing these outstanding issues, please call me at 899-2558 or Doran Barnes, MST's Planning Manager at 393-8129.

Sincerely,



Frank J. Lichtanski
General Manager

DJB:sb

cc: J. Barlich, FORA
G. Gromko, TAMC
N. Papadakis, AMBAG
J. Longley, City of Marina
T. Brown, City of Seaside
V. Ferguson, County of Monterey
J. Kersnar, City of Carmel-by-the Sea
S. Endsley, City of Del Rey Oaks
F. Meurer, City of Monterey
M. Huse, City of Pacific Grove
D. Mora, City of Salinas
K. Morgan, City of Sand City
D. Salazar, CSUMB
L. Martin, UCSC
MST Board of Directors



February 8, 1996

Ann Hebenstreit
Fort Ord Reuse Authority
100 Twelfth Street, Building 2880
Marina, CA 93933

Re: Selection of Public
Improvement Projects

Dear Ms. ^{Ann}Hebenstreit:

Thank you for the opportunity to review *the Selection of Public Improvement Projects and 05-01 Infrastructure Costs Analysis*. We are pleased to see that funding for thirteen transit buses has been identified as one of the public improvement projects.

As the planning process continues, assumptions related to transit services and capital costs need to be refined. The purpose of this letter is to provide more detailed planning assumptions about anticipated transit services at Fort Ord and to estimate the operating and capital costs for these services.

The service levels described in this letter are primarily intended to meet the transit needs which are internal to Fort Ord. We believe by providing the service levels described in this letter and by employing transit-oriented design concepts, the transit mode split at Fort Ord will be greater than the mode split in other parts of MST's service area.

Please note that additional transit services may be required for travel between Fort Ord and other areas in the region. These other areas might include: Salinas, the Monterey Peninsula, Santa Cruz, Hollister and San Jose. We will be working with TAMC to assess the needs for these types of services.

The First Five Years. During the next five years (1996-2000), we anticipate two new transit routes will need to be implemented at Fort Ord. We anticipate that each route will have a service frequency of thirty minutes and will operate sixteen hours per day from 7:00 a.m. until 11:00 p.m. These services may be established as independent lines or may be integrated into existing lines in MST's regional system.

154-10

Assuming the following: the lines will operate 362 days per year (no service on Christmas Day, New Years Day, and Thanksgiving); four buses will be required to be in service; service will be provided sixteen hours per day; the cost per service hour will be \$55.00; then, the estimated *annual* operating cost is \$1,438,000. A portion of this cost will be covered by passenger fares. In addition, increases in revenue to the Local Transportation Fund related to increased economic activity as reuse occurs at Fort Ord can be used to fund a portion of this cost. However, these two funding sources will not fully fund the estimated operating costs and additional funding sources will have to be identified.

During this initial five year period, five new transit coaches will have to be obtained. Four coaches will be required to operate the two lines discussed above and a fifth coach will be required as a "spare", which can be used when one of the primary coaches is being maintained or repaired. At an estimated cost of \$330,000 per coach, a total of \$1,650,000 will be required to purchase transit coaches during this first five year period. Please note there are no local, state or federal funds available to the region for the purchase of new or replacement coaches.

The *Selection of Public Improvement Projects and 01-05 Infrastructure Costs Analysis* indicates that thirteen transit coaches will be required in this first five year period. This should be adjusted to reflect the purchase of only five coaches.

The Second Five Year Period. During the period from 2001 to 2005, we anticipate two additional lines will need to be implemented. Again, these may be new lines or they may be integrated into existing services. We anticipate that each route will have a service frequency of thirty minutes and will operate sixteen hours per day from 7:00 a.m. until 11:00 p.m.

Assuming the following: the lines will operate 362 days per year (no service on Christmas Day, New Years Day, and Thanksgiving); four buses will be required to be in service; service will be provided sixteen hours per day; the cost per service hour will be \$55.00; then, the estimated *annual* operating cost is \$1,438,000. This is in addition to the \$1,438,000 in estimated *annual* operating costs required to operate the lines implemented during the first five year period. This results in a total *annual* operating costs of \$2,875,00, beginning sometime in this second five year period.

In conjunction with the implementation of additional service, five additional transit coaches will have to be obtained. Four coaches will be required to operate the two additional lines discussed above and a fifth coach will be required as a spare. At an estimated cost of \$330,000 per coach, a total of \$1,650,000 will be required to purchase transit coaches during this second five year period. This cost should be reflected in the *Selection of Public Improvement Projects and 01-05 Infrastructure Costs Analysis*.

Third Five Year Period. During the period from 2006 through 2010, we do not anticipate any additional transit services will be implemented. However, existing services will have to be maintained at an estimated total *annual* operating cost of \$2,875,000. No additional or replacement buses will be required during this period.

Fourth Five Year Period. During the period from 2011 to 2015, we do not anticipate any additional services will be implemented. Existing services will have to be maintained at an estimated total *annual* cost of \$2,875,000.

During this fourth five year period the five buses purchased during the first five year period will have to be replaced. The estimated life of a transit coach is twelve years. At an estimated cost of \$330,000 per coach, a total of \$1,650,000 will be required to purchase transit coaches during this second five year period. Again, this cost should be reflected in the *Selection of Public Improvement Projects and 01-05 Infrastructure Costs Analysis*.

Inflation. Please note that all costs discussed in this letter have been expressed on 1996 dollars. Appropriate rates of inflation must be applied to accurately project future costs. Increases in transit operating costs should be similar to increases in the consumer price index. However, increases in capital costs could be substantially higher.

Intermodal Center. In January 1995, Reimer Associates completed the Intermodal Centers Siting Study, as a supplement to the Fort Ord Infrastructure Study. This study, which was adopted by FORA, identifies several sites for intermodal centers at Fort Ord. These include an Intermodal Transit Center, which will be located North of the Main Gate on First Ave and a Park & Ride Transfer Facility which will be located at the intersection of Twelfth Street and Imjin Road.

The *Selection of Public Improvement Projects and 01-05 Infrastructure Costs Analysis* does not identify either of these facilities in the listing of Public Improvement Projects. We anticipate the Intermodal Transit Facility will be needed during the first five year period. The Park & Ride Transfer Facility most likely would not be developed until the second or third five year period. These facilities should be reflected in the *Selection of Public Improvement Projects and 01-05 Infrastructure Costs Analysis*.

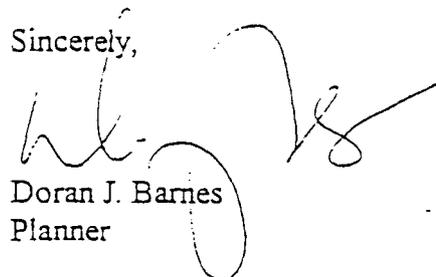
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As planning for the reuse of Fort Ord continues, the planning for the implementation of transit services and facility will have to again be refined. The information provided in this letter is intended to more accurately reflect the capital requirements for the four five-year planning periods identified in the *Selection of Public Improvement Projects and 01-05 Infrastructure Costs Analysis*. In addition, the operating costs projections are intended to be of assistance in preparing plans for the delivery of services as reuse of Fort Ord occurs.

Ann Hebenstreit
February 8, 1996
Page 4

Again, thank you for the opportunity to comment on the *Selection of Public Improvement Projects and 01-05 Infrastructure Costs Analysis*. If you have any questions about any of the information provided in this letter, please call me at 393-8129. If I can be of any assistance to you or the consulting team in planning the future transportation network at Fort Ord, please do not hesitate to call me.

Sincerely,



Doran J. Barnes
Planner

DJB:kh

cc: P. Reimer, Reimer Associates
A. McDonald, Angus McDonald Associates
T. Klim, JHK Associates
J. Dack, City of Marina
D. Potter, City of Seaside
N. Nicols, County of Monterey
D. Bilsie, TAMC
P. Goodchild, TAMC

Regional Transit Capital Improvements
to be included in the Public Facilities Improvement Plan

<i>Capital Improvements</i>	Capital Cost for Bus Acquisition	Percentage Allocated to Fort Ord	Capital Cost Allocated to Fort Ord
	(000)		(000)
<i>Route Coverage</i>			
One bus for service to Hidden Hills, Laguna Seca, San Benancio and Corral de Tierra along Highway 68	\$330	20%	\$66
One bus for developments along Highway 156 between Castroville and Prunedale	330	30%	99
Monterey Peninsula Airport and Laguna Seca on Sundays	0	20%	0
Two buses for direct Service Monterey-Watsonville	660	40%	264
Two buses for direct Service Monterey to San Benito County	660	30%	198
<i>Service Hours</i>			
Earlier Weekend Service	0	20%	0
<i>Service Frequencies</i>			
Two buses for additional service on Line 20-Salinas-Monterey	660	40%	264
Two buses for additional service on Line 21-Salinas Monterey	660	20%	132
<i>Facilities</i>			
Operations and Maintenance Facility	15,000	33%	5,000
TOTAL	\$18,300		\$6,023

Regional Transit Operating Improvements
to be included in the Public Services Plan

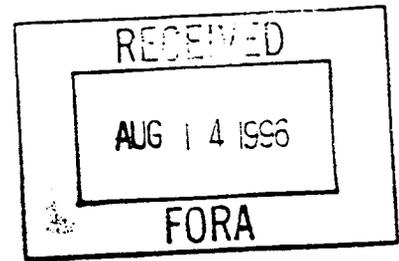
<i>Annual Operating Costs</i>	Annual Operating Costs	Percentage Allocated to Fort Ord	Annual Operating Cost Allocated to Fort Ord
	(000)		(000)
<i>Route Coverage with Service to:</i>			
Hidden Hills, Laguna Seca, San Benancio and Corral de Tierra along Highway 68	\$318	20%	\$64
Developments along Highway 156 between Castroville and Prunedale	318	30%	95
Monterey Peninsula Airport and Laguna Seca on Sundays	92	20%	18
Direct Service Monterey-Watsonville	636	40%	254
Direct Service Monterey to San Benito County	636	30%	191
<i>Increased Service Hours</i>			
Earlier Weekend Service	\$125	20%	25
<i>Service Frequencies</i>			
Line 20-Salinas-Monterey	\$636	40%	254
Line 21-Salinas Monterey	636	20%	127
Total Operating Costs	\$3,397		\$1,028



154-14



THE LEAGUE
OF WOMEN VOTERS
OF THE MONTEREY PENINSULA



August 10, 1996

Board of Directors
FORA
100 12th Street, Building 2880
Marina, CA 93933

Subject: DEIR for the Fort Ord Reuse Plan

Dear Board Members:

The League of Women Voters of the Monterey Peninsula has reviewed the DEIR for Fort Ord Reuse Plan and submits the following comments for your consideration.

General Comments

1. The proposed project includes many policies and programs which would have significant adverse impacts on the environment, e.g., new water projects, roadways, etc. Their impacts are not addressed as required by CEQA.
2. The EIR includes many mitigation measures such as new water projects and highways which would have significant adverse impacts on the environment. Their impacts should be addressed as required by CEQA.
3. Many of the project's impacts are considered mitigated because the FORA Plan includes programs and policies requiring mitigation prior to individual project approval. The EIR should address whether or not these programs and policies are enforceable. The statement on page 1-5 that the DEIR "assumes implementation of the policies and programs as a pre-condition of reuse and represents a commitment embodies in the certification of the EIR by FORA (emphasis added)" does not address this central issue and is not reassuring.
 - Are the Cities of Seaside, Marina, Monterey and Del Rey Oaks and the County of Monterey required to adopt the policies and programs?
 - If they don't, how would they be enforced?
 - If they do and don't implement them, how would they be enforced?
 - Would citizens be required to file a law suit to assure implementation?
 - How will these policies be assured for 40-60 years or after FORA itself is no longer in existence?

If these programs and policies are not enforceable, they should be identified as mitigation measures and included in the mitigation monitoring program which is an enforceable program.

155-1

4. The feasibility of all mitigation measures and/or land use programs and policies should be addressed. Not doing so understates the project's impacts and is misleading. For example, the roadway/highway system would require over \$.5 billion to complete; yet funding for major projects for all of Monterey County through 2010 is only sufficient to improve Highway 101 near Prunedale and construct the Hatton Canyon Freeway.

4

5. Given the extent of mitigation needed for identified impacts, an Alternative should be developed which is more feasible and within existing and foreseeable conditions and constraints. A "2015 Project" could be more easily defined, with objectives corresponding with the period of FORA's mandate and based on data for which official population forecasts are available. The year 2015 would then be the opportunity for further evaluation of longer-term goals, based on the forecasting information which has been gathered. This would still allow for replacement of lost population and jobs. The number of jobs which existed before closure would actually be recovered (exceeded) by 2015 under the No Project Alternative, which retains existing housing units and achieves a job:housing balance not much worse than the Reuse Plan.

5

Specific Comments

1. Page 2-2. It is important to note in the Summary that environmental impacts associated with development after 2015 are based on modeling, and, therefore, are more speculative.

6

2. Page 4-2. The DEIR refers to the underlying activity which is described in the DEIR as "adoption of the Reuse Plan". In fact, the underlying activity is development at Fort Ord.

7

3. Page 4-2. The DEIR states, that the DEIR is "consistent ... with CEQA case law that indicates preparation need not await the conclusion of all potentially relevant studies, this EIR presents reasonable assumption about those elements of the project that could affect the environmental analysis". "Potentially relevant studies" should be defined and case law cited. Additionally, a listing of potentially relevant studies related to the Fort Ord Reuse Plan should be provided.

8

3. Page 4-21. Identifying the project's major improvement over the jobs:housing ratio for the Army's Alternative 7 as a beneficial impact indicates a profound misunderstanding of the CEQA process. CEQA requires that impacts be addressed in relationship to the baseline - not imaginary alternatives or strawmen. The on-base jobs:housing ratio at Fort Ord was computed at .77 at the time of base closure, well within the optimal range of .75-1.25. With a jobs:housing ratio of 2.05 the proposed project is out of the range considered balanced and, therefore, not an improvement over the baseline nor a beneficial impact.

9

Characterizing the Project's jobs: housing balance as "improved" over previous Alternatives is inappropriate and the references are confusing. The Army's 12 Alternatives 1-6R projected socioeconomic impacts on Monterey County as a whole.

↓

Their totals for 6R, 7, and 8 didn't include student population and housing units. The Reuse Plan Alternatives 7 and 8 have since been revised to include these numbers and are calculated for Fort Ord. (There is an error in Table 2.4-1, where the ratio should be corrected to 2.39 for Alternative 8, as it appears in the following table.)

The conclusion in the Summary (2.1 Significant Differences...) that the project "satisfies the demand for adequate housing in the local region" is also unsupported. Creation of a large number of jobs without a balance of housing at proposed buildout may have potentially significant impacts on the region by increasing both automobile commuter traffic and demand for affordable housing.

4. Page 4-42 and 4-43. The document indicates that 11,662 AF of water would be needed to support buildout of the reuse plan and describes policies and programs that would "need to be adopted before development of the proposed project could proceed." These policies include provisions such as conditioning project approval based on verification of an assured long-term water supply. If implementation of these policies are not assured, they should be included as mitigation measures to ensure enforceability. 10

5. Page 4-44. The EIR includes the following statement as the final finding regarding water: 11

Because a number of reasonable, new water supply sources have been identified to support the proposed project, including the siting of an on-site desalination plant assuming adoption of the policies, programs and mitigations identified above, the increased demand for water would be considered less than significant impact at the project level.

To conclude that a project comprised of approximately 72,000 people, 22,200 dwelling units and 45,500 jobs would not have an impact on water supply in a region of severe seawater intrusion and illegal overdraft of the Carmel River based on projects that have no timeline and assured source of funding and policies that may very well not be enforceable is misleading and understates the project's impact.

7. Page 4-44. A water allocation and monitoring plan should be required to be adopted for the water supply expected to be available for the near-term (6,600 AF), based on already identified and proposed needs, such as set-asides for the POM and CSUMB. Agencies responsible for implementation should be identified. 12

8. Page 4-91. The EIR does not evaluate the project's impact on existing roads and highways and does not clearly identify mitigation measures. It assumes construction of projects that are not approved, have no timeline and no source of funding. Based on an inadequate evaluation and the construction of mythical highway projects, the EIR finds that the impact of travel demand is "less than significant." This section should be redone to be consistent with CEQA requirements. It should clearly address the feasibility of all projects and provide a scenario that represents a realistic future. 13

9. Page 5-11. Table 5.2-1 shows AMBAG forecasts a Fort Ord population of 66,612 (including 20,000 students) by 2015. On page 4-25, it is stated that anticipated figures would be lower than AMBAG's (28,859 residents plus 10,000 students). The source for these population figures is given as AMBAG in the footnote to Table 5.2- 14

1. The 66,612 seems high and may be an error in transferring data from the DEIS. It should be checked. Recent statements by CSUMB also indicate much slower growth than first predicted is likely, based on local water supply constraints and state funding.

We appreciate the difficulty of the task FORA has undertaken and the extensive amount of data which members, staff and consultants have gathered to aid in determining the feasibility of the proposed project. The public review period may well need further extension with additional discussion sessions scheduled to give members of each of the affected communities more opportunities to ask questions. Finally, because the document requires major revisions, we request that a revised EIR be prepared and recirculated for public comments.

Sincerely,



Lorita Fisher
President



THE LEAGUE
OF WOMEN VOTERS
OF THE MONTEREY PENINSULA

August 7, 1996

Board of Directors
FORA
100 12th Street, Building 2880
Marina, CA 93933

Subject: Fort Ord Reuse Plan

Dear Board Members:

The League of Women Voters of the Monterey Peninsula has reviewed the Fort Ord Reuse Plan and submits the following comments for your consideration. 16

Overall Plan

A League study on the reuse of Fort Ord in 1992 resulted in support of many of the land uses included in the plan (attached). In particular, the plan is sensitive to the interrelationship among air quality, transportation and housing by encouraging higher density and pedestrian and transit oriented development.

However, the overall plan far exceeds previous uses (e.g., population is over 110% greater), is clearly inconsistent with infrastructure and resource constraints, and goes way beyond what is needed for the economic recovery of Seaside and Marina. These findings are inconsistent with FORA's purpose which is to "maintain and protect the unique environmental resources of the area", (Title 7.85, Section 67651 [b-c]). We strongly recommend that the Plan be scaled back to a level of population and employment that existed just prior to the time of the closure of Fort Ord.

The Socioeconomics section of the DEIR describes the baseline 1991 year and does not include much of the recent demographic data contained in the Reuse Business Plan. For example, State Department of Finance estimates show less population loss for the Monterey Peninsula than was anticipated in AMBAG forecasts, i.e., a population of 104,853 in 1995 compared to a projected 97,032. The Reuse Plan also points out that while 20,000 jobs were forecast to be lost due to base closure, the County's net loss as of 1995 was only 13,000. 17

The marketing study cites the economic and population growth which has continued since base closing and concludes that the Peninsula can "capture" significant percentages of potential county growth and housing demand if: (1) a substantial supply of housing can be developed on Fort Ord during 1995-2000; and (2) successful redevelopment of Ft. Ord occurs from 1995 - 2015. 18

Even though it is appropriate to use the baseline year of 1991 to measure recovery, changes in the surrounding environment have occurred in the subsequent 5-years which should be considered in the plan. The fact that there is continuing growth in the surrounding area makes it less convincing that economic benefit should outweigh environmental impacts. This further supports the need to strive for balance, recognizing that the future economic survival of the area depends largely on conservation of its natural resources.

Business and Operations Plan

Much of the information on costs and financing contained in this plan is not easily understood by the average reader, and more of the data should be included in tabular form. Concise financial projections should be added to the narrative Overview to help the public as well as decision-makers assess the cost in public funds v. benefits of the project over time. This should include the annual operations budget for FORA itself and sources of revenue. Local residents and business owners in the affected jurisdictions, including special districts, need to have a clear understanding of how proposed financing methods will affect them, for what period of time, and whether or not voter approval will be needed.

Housing Element

While we are pleased to see that the residential acreage has been increased over that in the earlier plan, a Housing Element is still needed. Since the Reuse Plan is considered a General Plan, a Housing Element should be prepared. As prescribed for the Land Use Plan itself, the Housing Element would be required to be adopted by the two cities and County of Monterey as well.

The DEIR points out that the base in 1991 "held a large regionally significant supply of housing, supporting 23,716 housing units, of which 6,365 were for families." The plan for utilization/destruction/sale of this housing should be included in the Element. The Business Plan gathered by the SKM Group and earlier analyses of the local housing market by Sedway and Associates may provide much of the necessary data without extensive additional research.

The Housing Element should contain an Inclusionary Program to ensure that a portion of existing base housing, as well as new construction, will be affordable for low and moderate income households. The inclusionary requirement should be enforceable for at least a 20-year period or until the Peninsula market offers sufficient opportunities for the local work force. Some provision will be needed for temporary rental housing, although local workers are expected to fill most construction jobs. The Inclusionary Program might be modeled on those of the City of Monterey and Monterey County.

The Business Plan, Objective C, calls for the "highest and best use for residential land". The marketing study indicates that "the bulk of new housing projected for the former Ft. Ord will be priced at levels substantially above the medians for existing homes in communities immediately surrounding the former Ft. Ord." It also states that "both the cities of Seaside and Marina have a sufficient supply of low income housing within their existing

residential areas." There should be data to substantiate this, i.e., figures showing median household incomes, median home prices and rental costs in these cities compared with established housing affordability standards. What are vacancy rates, and are there sufficient rental units and single-family homes with three or more bedroom? This information would be needed in a Housing Element.

The estimated numbers and types of jobs were apparently estimated on the basis of square footage of land allocated to various business and commercial uses. SKMG figures show projected average wages by land use with a range of \$15,000 (retail) to \$31,576 (light industrial and business park). More than one income per household will be needed to afford even the lowest-priced new homes; \$54,000 household income could afford \$190,000 home (above moderate). New teachers, firefighters, police officers and other public employees are among those who will need housing close to their new jobs; recruiting is presently difficult because of high housing costs on the Peninsula.

24

There is no question that Seaside and Marina need more jobs and that they have been providing relatively more affordable housing than other Peninsula areas. From their economic standpoint this needs correction and is an important goal of the Plan. However, there still must be sufficient housing to include retirees and students as well as much of the work force, in order for the Reuse Plan to draw permanent new businesses. Finally, providing housing close to jobs is one of the few ways to reduce travel demand and address significant impacts on the transportation system.

Thank you for your consideration.

Sincerely,



Lorita Fisher
President

Enc.

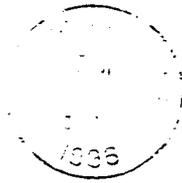
LEAGUE OF WOMEN VOTERS OF THE MONTEREY PENINSULA

POSITION ON REUSE OF FORT ORD

The League of Women Voters of the Monterey Peninsula supports the following land uses:

1. Development that promotes replacement of jobs lost due to the downsizing of Fort Ord and new jobs which provide a diversity of job opportunities and address unemployment within infrastructure and resource constraints.
2. Development that accommodates a residential population similar to the population loss resulting from the downsizing of Fort Ord.
3. Development adjacent to existing urban areas.
4. Provisions for low income housing, including housing for agricultural workers and the homeless.
5. The following land uses within infrastructure and resource constraints:
 - a. A university or consortium of universities
 - b. Light industry that is marine oriented or related to the education facilities
 - c. Agriculture and mariculture research and production facilities
 - d. A full range of housing to support the employment base located adjacent to employment centers, with requisite support services.
 - e. Preservation of existing medical services and provision of medical facilities that meet future medical needs.
 - f. Maintenance of coastal areas west of Highway 1 in open space (including use for storm water storage) except for development of marine research facilities dependent on coastal access of the old main sewer plant site consistent with maximum protection for coastal dunes and visual resources.
 - g. Areas that include steep slopes, endangered species, unit habitat, wildlife and wetlands preserved as open space and for recreation use consistent with resource preservation.
 - h. A performing arts center and recreation and sports facilities developed in cooperation with the university.
 - i. Maintenance of existing golf courses irrigated with reclaimed water.
6. The League does not support the following land uses:
 - a. New golf courses.
 - b. Tourist attraction recreational facilities such as a Disneyland or Marine World.

Diane Peccianti
25715 Tierra Grande Drive
Carmel, CA 93923



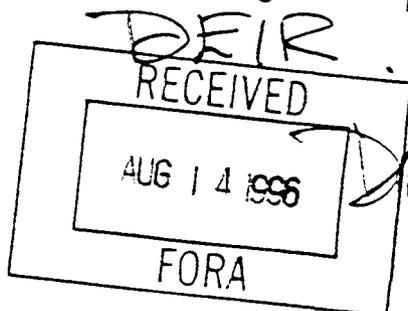
FORA -
100 12th St. Bldg. 2880
Marina, CA 93953

FORA -

Please extend the deadline
for "Comments" until December!

I've worked on Fort Ord
for over 20 years, and
care deeply what happens
to Fort Ord and the
surrounding communities!!

We are all in this together.
Give us all the chance
to really review the



DEIR. Thank you!
Diane Peccianti

August 11, 1996

FORA
100 12th St. Bldg. 2880
Marina, CA. 93933

Dear Sir or Madam,

I am writing to ask that the deadline for comments concerning the changes to Fort Ord be extended from August 30 to December 13.

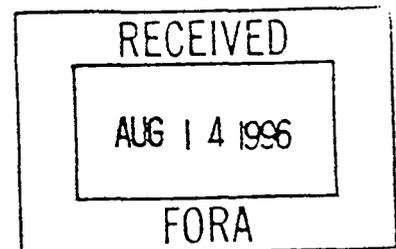
There are many questions that seem to me unanswered in the current plan, and I hope you will give added time to various problems can be addressed.

Cordially,



Robert L. Getchell
9975 Eddy Rd.
Carmel Valley, CA. 93923
625-6863

157

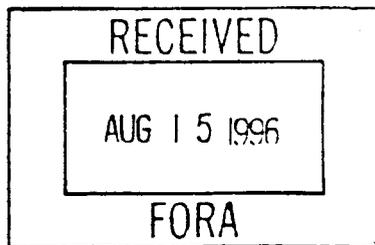


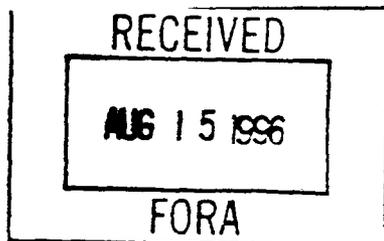
To THE FORA Com.
I would like to
know why? you don't
rent some of those
homes in Ft Ord to
retired persons, disabled
vets, why do 'we come
last'? persons working in
the PX eat rent - why
not us - there are many
of us out here THAT
would rent. why do you
NOT EVEN CONSIDER us -
Do you have a good
reason? If PX EAT
PERSONS CAN PAY

There rent to where ever
they pay it, why can't
we - why not fill up
those homes and make
money off them -
why let them go to
waste?

Theresa Ballagh
Disabled wife of a
Retired man.

Thank you,





August 12, 1996

FORA
100 12th Street
Building 2880
Marina, CA 93933

Ref: Fort Ord draft E.I.R.
Alignment of Right-Of-Way
for State Highway 68
Fort Ord Bypass
Salinas to Monterey

The Fort Ord draft E.I.R. shows a right-of-way for a proposed 4 lane freeway for relieving traffic congestion on existing Hwy 68 in the future. The E.I.R. refers to this proposed freeway as Hwy 68 Fort Ord Bypass and it would extend from the Toro Park area to an interchange at Hwy 218 to the west. This particular freeway alignment was never presented for review at a properly advertised public hearing. The E.I.R. was only recently made available showing the revised alignment and this only after already having received endorsement from the Monterey County Board of Supervisors. The Public has been "left out of the loop" completely. Several other possible alignments were presented earlier by Caltrans, but never this one.

The background for positioning this ROW alignment is as follows:

- 1) In November 1992 Caltrans sponsored a meeting at the Cypress Community Church in Monterey. At that meeting elaborate displays were presented showing several possible alignments for this proposed ROW, none of which resemble the one now shown in the E.I.R. At that meeting those in attendance were asked for and contributed input concerning the alignments presented. Caltrans then told us they would consider our input and "keep in touch with us as their studies progressed."
- 2) Since this 1992 meeting we have heard nothing from Caltrans!
- 3) A year and a half after the 1992 meeting my wife and I, only by happenstance, learned from York School of an Agency Coordination Meeting on this Hwy 68 ROW study to be held on May 5, 1994 at the same Community Church. The Public was not invited to this meeting. However because of the proximity of Fort Ord to both York School and our home, we attended this meeting on behalf of ourselves and the school. We were surprised to learn at that meeting that the ROW alignment now proposed was entirely different from any of those shown us in 1992. We voiced our displeasure at this revision made in the E.I.R. without inviting input from the Public nor even an awareness by the Public that such revision had occurred.
- 4) Subsequent to the above meeting Caltrans apparently made a "private compromise" with York School whereby the new ROW alignment would be swung around land the school had been promised for nature study purposes and a cross-country running course. However, we did not learn of this until after the June 14, 1996 FORA meeting mentioned under paragraph 6 below.

5) On June 11, 1996 Caltrans request for conveyance of an easement to accommodate this freeway appeared on the Consent Calendar (Item 23) of the Board of Supervisors asking for their support of Caltrans request. At this meeting I asked that this item be pulled from the Consent Calendar because there had not been a properly advertised public hearing on this "alignment." The Board was then told by Dr. Gromke, Director of Public Works, that there had been a public hearing, in fact "more than one" and my request was denied.

6) On June 14, 1996 my wife and I attended the FORA meeting at Fort Ord. This was not a public hearing as such, but due to an agenda revision, I was given the opportunity to address the Panel. I then asked FORA to "pull" Item 2(c), Hwy 68 alignment, from the Consent Agenda. The basis for my request was that this item had never been agendized at a properly advertised Public Hearing. Supervisor Karas then stated that I was in error and that "all kinds of public hearings had been held on this matter." FORA then denied my request.

7) On July 1, 1996 we attended the FORA meeting at Oldemeyer Center in Seaside. This was a public hearing at which I again stated my objection to the E.I.R. showing the Corridor ROW without benefit of any input from the public. Supervisor Karas again repeated his claim that "all kinds of public hearings have been held and I am tired of this person making up untrue charges against us." I submitted a copy of my objections to the woman in attendance for FORA.

To just show the map location of such a significant freeway as this Hwy 68 Fort Ord Bypass seriously affects property values, planning considerations, and the environment in general for this entire area. For once this ROW is recorded on the map it is then too easily accepted as "the approved route" by planners and engineers of the future no matter how many years to development. To approve even the tentative location of this freeway without any public hearing is unconscionable if not actually illegal.

I have checked with our various agencies including Caltrans, County Planning, Public Works and the Clerk of the Board and can find no record of any properly advertised public hearing notice that includes as an agenda item this revised Hwy 68 Bypass alignment.

I am requesting any information you may have or can locate which might indicate that such public hearings have ever been so advertised and held for this revised alignment of the Hwy 68 Fort Ord Bypass.

If it can not be shown that such public hearings have been so advertised and held to date, and that included this particular ROW alignment, then I am hereby requesting that such public hearing be properly advertised and held before preparation of the Final E.I.R. and that the ROW itself be immediately removed from this map even as a tentative alignment.

Clark Beck

Clark Beck
23765 Spectacular Bid Lane
Monterey, CA 93940
408-655-8586

139-2

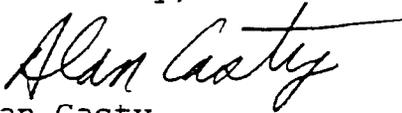
August 15, 1996

FORA:

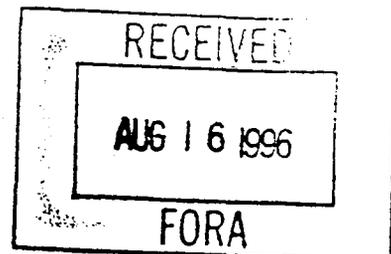
I strongly support the request to extend the deadline for comments on the DEIR concerning reuse of Fort Ord until Dec. 13. This is such a massive set of proposals that any hasty review would be totally irresponsible. These ideas can have tremendous, and in my view devastating, impact on this area, and all parties must be allowed enough time to analyze the material and present their positions, and hopefully get some necessary modifications made before this plan is accepted hastily, and I am afraid, greedily by some of its promoters.

My wife and I urge you to accept this request.

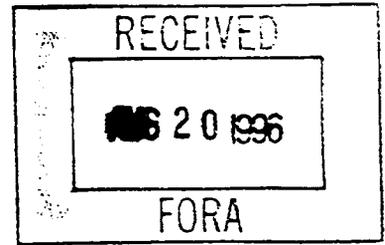
Yours truly,



Alan Casty
225 17 Mile Drive
Pacific Grove, CA 93950



August 19



FORA
100 12th St, Bldg 2880
Marina CA 93933

We support the request that the deadline on the Ant Ord DEIR be extended to December 13. Considering the tremendous impact this plan would have the area it is difficult to believe that it is being considered in such a short time. There are too many unanswered questions.

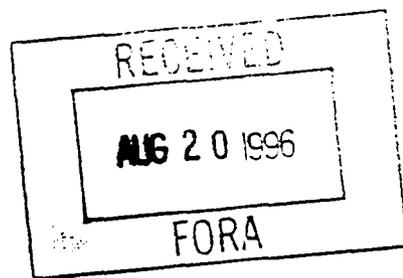
Please give us adequate time to read and discuss.

Ruth Grasier
Vance Grasier

26189 Valley View
Carmel CA 93923



August 19, 1996



Ms. Ann Hebenstreit
Fort Ord Reuse Authority
100 12th Street, Building 2880
Marina, California 93933

Dear Ann:

Given this city's active community development agenda over the past two years, and the fact that no lands within the former base will be annexed to the City, this staff's role in the FORA planning process has been limited. However, the following comments are offered to highlight the key points and caveats reported in the Comprehensive Business Plan, a key element of the FORA Plan. While the ultimate land use plan for FORA is important, it is probably more important at this juncture to review the "Comprehensive Business Plan" or what most planners call the implementation or economic development program, to determine where some of the problems may arise. As one wise urban planning professor once said: "the real planners are the ones that control the budget."

The following excerpts taken from the CBP were transmitted to our Council as part of the presentation you gave at the August 6th meeting. Thank you for your excellent summary of what has transpired in the FORA planning process to date. The Sand City Council was advised, and so should all FORA members, that the FORA Plan should not be perceived as being "anti-environmental", but rather as being "pro reuse". In this City's opinion, the overriding goal of all Peninsula residents should be the replacement of the 16,000 to 17,000 jobs and economic activity lost due to the closure of Fort Ord. Until that is achieved, we have not even approached the no-growth, status-quo scenario.

Key Excerpts from the Comprehensive Business Plan, and Related Commentary

1. "As this final version of the FORA Comprehensive Business Plan (CBP) is finished, a number of important issues remain unresolved. For example, will there be a redevelopment agency or agencies? What will be FORA's main funding sources? In preparing the final CBP document, the Team had to make certain assumptions about these uncertainties. These are identified where appropriate."

Comment: There are repeated warnings in the CBP that FORA has not addressed some of the most critical issues related to appropriate

City Hall
1 Sylvan Park,
Sand City, CA
93955

Administration
(408) 394-3054

Planning
(408) 394-6700

FAX
(408) 394-2472

Police
(408) 394-1451

FAX
(408) 394-1038

Incorporated
May 31, 1960

funding mechanisms necessary to implement the Plan - with redevelopment area formation being one of the prime candidates. This staff understands that future implementation actions will be resolved following the more political problem of determining the appropriate land use mix for the former base.

2. The draft Reuse Plan includes several statements of goals and objectives. The following points are of particular interest to Sand City: 2

"Allocating the Costs of Habitat Management. Since the natural resource values within the areas to be managed to protect habitat will accrue to all of the lands within FORA, establish a principle of sharing the costs of habitat management equitably among all local agencies."

Comment: This should read: "all agencies with properties or interests within the FORA jurisdictional boundaries." Sand City and others would, perhaps, be willing to participate in habitat maintenance within the former base if it could transfer some habitat protection responsibilities from its jurisdiction to Fort Ord.

"Integration of Long-Range Plans for Fort Ord. Ensure that the Plan's vision for the reuse of Fort Ord is explicitly defined and regularly updated in order to facilitate coordinated regional planning." 3

Comment: Given the small size of Sand City, and its limited remaining traffic-generating potential, it is probable that a regional traffic impact fee will need to be assessed for future traffic impacts in the Fort Ord region as part of an overall funding strategy that includes state and federal assistance. The possibility of such a regional traffic impact fee should be mentioned in the draft EIR as a potential mitigation measure for traffic that will be generated from the reuse of the base.

3. Comment: Important to adjoining communities that will not have direct land use authority in Fort Ord, is the economic impact that the former base will have. In this respect, it is important and encouraging to note that seven educational institutions will eventually locate on the former base: (1) California State University, Monterey Bay, (2) University of California, Santa Cruz with its UCMBEST facilities (University of California Monterey Bay Science, Education and Technology Center); (3) Monterey Peninsula College; (4) Golden Gate University; (5) Monterey Institute for Research in Astronomy (MIRA), (6) the Monterey College of Law, and (7) the Monterey Peninsula Unified School District. These institutions generate higher-paying jobs and a well-trained labor pool that could ultimately attract other better-paying institutions or industries as a positive "spillover effect". 4

4. PROBLEM: Infrastructure Capacity and Costs: "Potential problems exist due to capacity constraints relative to water and the supporting regional road system. Fort Ord is more like a completely new community than many bases. The costs associated with preparing the land for development may be so high as to make some Fort Ord sites noncompetitive."

5

5. PROBLEM: "Nine different local governments are represented on the FORA board. Three (Marina, Seaside, and the County of Monterey) will have major jurisdictional interests within the plan area. With this multiplicity of entities will inevitably come a multiplicity of agendas and complexity of decision-making. This could make it more difficult for FORA to maintain the integrity of the Plan and to speak with one voice to the private sector with regard to the development agenda and process at Fort Ord."

6

Comment: As we have witnessed in Sand City, it is important to the private development community to receive a clear message from the Council and its administration regarding appropriate development support. Because of a unified Council on most projects, the development outcome is predictable to developers, a highly valued commodity in today's regulatory environment. It is indeed one of the major attractions that Sand City currently has to offer the economic development community. This may prove not to be the case at FORA.

One point that we have learned in Sand City is that developers want to see a clearly defined process for obtaining their required land use entitlements. Even if it is a difficult process, you can achieve developer interest if there is a clear course to follow.

6. PROBLEM: "Northern California and the Monterey Peninsula in particular have reputations for being extremely sensitive on environmental or growth issues, and therefore represent a difficult regulatory environment. While not all communities severely restrict developers, the area is generally perceived this way."

7

7. Comment: From a real estate market perspective, and as currently allowed in the Draft Reuse Plan, the following land uses will develop within the former base provided that infrastructure costs can be funded or allocated to the residual land value. These uses are exclusive of the recreational uses (beach, parks, trails and BLM lands), open space uses (habitat preserve), educational facilities and public agency uses that comprise the vast majority of land use within the FORA jurisdictional boundaries.

8

a. **Light-Industrial:** The FORA economists forecast that the

former base has the potential to capture 25 percent (25%) of the ultimate Monterey County market demand for this type of use through the year 2015. This could result in as much as 1.1 million square feet of light-industrial use.

Comment: This is considered to be a moderate amount. To put it in perspective, in good economic times, the City of San Jose has accommodated this amount of light industrial growth in one year.

- b. **Research & Development:** FORA economists forecast that 1.8 million square feet of R&D could be accommodated within the former base through the year 2015. 9

Comment: This type of industrial development is generally considered to be the most desirable as it is low-impact, high-pay and relatively recession-proof. This segment of the national economy is also one of the most unpredictable. The CEO of a Silicon Valley firm once stated that to really get a true idea of what the future holds in research and development, one would have to interview every graduating student in electrical engineering, physics, the computer sciences and the biological sciences to figure out what types of future enterprises they had in mind, that would later turn into the next "Genentech" or "Advanced Micro-Devices".

- c. **Residential:** The economists forecast as many as 6,250 new dwellings being constructed within the former base by the year 2015. The Business Plan forwards the position that a good and moderately-priced housing supply is essential in attracting new businesses into the reuse area. 10

Comment: Much of this depends upon the job-creation that may occur within the base and other nearby areas of the County. Sand City's future housing market will have to compete with this planned new housing.

- d. **Retail:** In addition to local-serving, convenience retailing that will occur as a result of the residential build-up within the former base, Sand City should be particularly interested in the prospect, according to the consulting economists, that a regionally-serving "entertainment center" is possible at Fort Ord. According to the CBP, the complex could include a cineplex (the hottest thing in the current California real estate market), restaurants, and specialty shops. Eventual expansion of this type of center to 500,000 square feet is viewed as being very 11

feasible, particularly in the timeframe of 2011 to 2015.

Comment: One wonders, however, if movie theatres, as we know them, will even be around by then.

- e. **Lodging:** Also of interest to Sand City, from a market competition perspective, is the likelihood of developing visitor-serving accommodations within the former base. The economic consultants predict, and the FORA draft plan accommodates, the potential for 1,000 hotel rooms through the year 2015. 12

Comment: City staff believes that this land use should be viewed as being good for the Peninsula, bringing in more tourist dollars, and good for Sand City. The lodging type at Fort Ord will be different from the lodging type to be offered along our coast line and will therefore, be less competitive to the market share the City wishes to capture.

8. **PROVISION OF ADEQUATE WATER SUPPLY IS CRITICAL:** "While provision of sewerage, drainage, transportation and energy can be assured in order to facilitate the reuse of Fort Ord (estimated at a cost of \$45.8 million), it will be the proven availability of an adequate potable water supply that will govern the pace and extent of development." "In the case of potable water supply, the investment and time required to produce an uncontested desalinated or other new water supply will set the schedule for ultimate reuse buildout." 13

Comment: The potential for a desalination plant site to service the former base if necessary should be clearly identified as part of the Fort Ord Dunes State Park General Plan, currently in progress. This should be done not only to protect the future of the former base, but also to ease the pressure on existing water sources needed by other jurisdictions that are within the Cal-Am service area.

9. Comment: The three primary agencies that will have land use authority within the former base have advocated the position that regional cost-sharing from all FORA member agencies will be necessary to help pay for the infrastructure upgrades involved in the base's redevelopment. Agencies without land use authority within the former base should only support this position if there was also equitable revenue-sharing to all financial participants. 14

In closing, this City supports, at a minimum, the restoration of economic and housing activity that existed prior to the base closure. We do not believe that providing University and other educational facilities alone will achieve this goal.

15

Sincerely,



Steve Matarazzo
Community Development Director

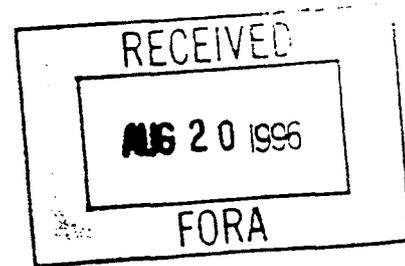
for1.sm

cc: City Administrator
City Council

for1.sm

August 17, 1996

To FORA



Re: Draft EIR for the right-of-way reserved for "potential 4-lane expressway" extending northerly from existing York Road as shown on Fig. 3.5-2 of the DEIR.

I find no evidence that this ROW has ever been presented as an "agendized" item at any public hearing. By this I mean a public hearing properly advertised in a local newspaper. I also mean a public hearing that addressed the positioning of this ROW as well as the traffic analysis that went into its concept.

If there has been a proper public hearing on this matter please advise me of the date of same and the particulars concerning this expressway that were presented at such a public hearing.

If there has been no such proper public hearing then on what basis was the public excluded from any input on this item?

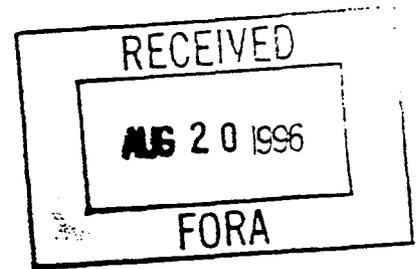
Since this proposed expressway is given such prominence in the EIR, as well as a main element on the cover of the EIR it must, as a result, greatly affect future property values for many years to come. Much care should be given to the analysis of this expressway including an opportunity for public input.

Thank you for your consideration.

Clark Beck

Clark Beck
23765 Spectacular Bid Lane
Monterey, CA 93940
655-8586

PS: If no proper public hearing has been advertised and held on this matter then I am requesting that one be scheduled as soon as possible.



August 18, 1996

To: FORA

Re: DEIR

Please find enclosed 17 separate letters which address questions I have about the DEIR. Each deals with a disparate issue. I chose to not simply list them so I could copy the involved agencies and individuals at a later date. Actually, I HAVE NOT FINISHED THE DEIR having had to return it to the Monterey Public Library.

I would be interested to know when I will begin receiving answers to these questions.

Sincerely,

Gudrun I. Beck

Gudrun I. Beck
23765 Spectacular Bid Lane
Monterey, CA 93940

August 18, 1996

To: FORA

Re: DEIR

Is there public policy relating to building a freeway and/or expressway along side a school? I believe there is a recommended policy that schools not be built alongside freeways because of the noise level. (They can't even open classroom windows because of the roar.) I find it unconscionable that "planners" would draft a concept sandwiching York School (admittedly private) between a freeway and a proposed four lane expressway, no matter how far in the future. York has been at that location for years.

Gudrun Beck
23765 Spectacular Bid Lane
Monterey, CA 93940

cc: The York School

August 16, 1996

To: FORA

Re: DEIR

Where is the written explanation to accompany the table that shows a new runway and a runway extension at the airport? Is this a pipe dream on the part of FORA to have a big airport in the midst of Del Rey Oaks and Monterey to support the grand plans for Fort Ord? Or are these actual County plans for a future larger airport which have been already presented to the public? What County Agency provided you with that information for the DEIR? | 2

Gudrun Beck
23765 Spectacular Bid Lane
Monterey, CA 93940

August 16, 1996

To: FORA

Re: DEIR

I am interested in the references to shopping patterns in the "villages" described in the DEIR. How I wish! But planners cannot change consumer patterns by wishing it were so. Ask any housewife/working mother. Realistically, shoppers will migrate to Sand City and Costco, Target, Lucky Super Store, OSH. A recent study showed that Americans are glued to their cars more than ever. A 1995 report (Land and People, p. 15) stated: "Within ten years after WalMart's move into Iowa, almost half of the men's and boy's clothing stores in the state disappeared and a third of all of Iowa's hardware and grocery stores closed." We already have mega-stores built and planned in nearby communities. If that were not the case maybe small shops in "village communities" could survive on Fort Ord. Sadly, it is the case. The DEIR needs some advice from housewives, small business owners pushed out by chain stores and a strong dose of realism. My deepest fear is that once development starts at Fort Ord, the first ones in will be the chain stores leaving our own business community high and dry and leaving our kids with jobs as retail clerks.

3

Gudrun Beck
23765 Spectacular Bid Lane
Monterey, CA 93940

August 16, 1996

To: FORA

Re: DEIR

Why is there no alternative to restore the population to what it was when the Army left Fort Ord rather than double it? A 1992 AMBAG report showed the population of Marina at 25,864 and Seaside at 39,979. A 1996 AMBAG report showed Marina at 17,734 and Seaside at 28,300. This is a combined population loss of just under 20,000. Since the student population at CSUMB is not included in these numbers (DEIR 2-15) what is the real population impact and where can it be found in the DEIR? 4

Gudrun Beck
23765 Spectacular Bid Lane
Monterey, CA 93940

August 16, 1996

To: FORA

Re: DEIR

The DEIR (3,3, 3-35) states CSUMB currently plans to accommodate 25,000 full-time students. CSUMB President Smith publicly stated that the campus would probably never achieve that size citing the constraints of water availability as well as computer off-site learning. Do your planners not read the local newspapers? Where in the DEIR are hard numbers derived from consultations with President Smith after his public remarks?

5

Gudrun Beck
23765 Spectacular Bid Lane
Monterey, CA 93940

August 16, 1996

To: FORA

Re: DEIR

The DEIR states that Marina and Seaside now have a "sufficient supply of low cost housing." (4-18) The concern then that the DEIR shows for providing area housing is not really for affordable housing. Where in the DEIR are figures showing current area housing supplies (houses and condos on the market, length of time on the market, etc.) and what the impacts of such a vast increase of housing units on Fort Ord would have on the market value of current homes and condos and those already approved and currently proposed for development?

Gudrun Beck
23765 Spectacular Bid Lane
Monterey, CA 93940

August 16, 1996

To: FORA

Re: DEIR

The DEIR (2-21) proposes to "capture" 25% of County demand for light industrial business park and states that substantial improvements to road connections to "inland areas" must be provided. First, will those road improvements precede the development of "25% of County demand for light industrial park"? Where in the DEIR does it show the time line for the infrastructure improvements? Or does FORA intend to accept such development without these improvements first? Second, the DEIR suggests that FORA court Silicon Valley satellite facilities and that Highway 156 be four-laned to accommodate commuting from Silicon Valley. Such commuting is exactly the problem in the Bay Area. Why would we ever invite long distance commuting to our area? (3-61)

Gudrun Beck
23765 Spectacular Bid Lane
Monterey, CA 93940

cc: Oak Hills Homeowners Association

August 16, 1996

To: FORA

Re: DEIR

The DEIR shows Hwy 218 as four lanes from a HWY 68 freeway interchange to Fort Ord's North-South Road, by Frog Pond, then reverting to two lanes through Del Rey Oaks until Fremont Blvd. where it is already four lanes. What guarantee is there that Caltrans will honor a two lane arterial for such a short distance that connects two freeways in the future? Caltrans has already unilaterally increased the speed limit on 218 from 35 mph to 45 mph despite the fact that it is a residential area and a roadway with crosswalks!

Gudrun Beck
23765 Spectacular Bid Lane
Monterey, CA 93940

August 16, 1996

To: FORA

Re: DEIR

What will be the policy of big semi-trucks going into the
new business parks at Fort Ord and where in the DEIR is this
issue covered? | 10

Gudrun Beck
23765 Spectacular Bid Lane
Monterey, CA 93940

August 16, 1996

To: FORA

Re: DEIR

Where in the DEIR is there an accounting of the already approved and proposed developments and current lots of record showing the cumulative effects of these? Caltrans expects such cummulative numbers in making transportation assessments when new developments (as Fort Ord) are proposed. ||

Gudrun Beck
23765 Spectacular Bid Lane
Monterey, CA 93940

August 16, 1996

To: FORA

Re: DEIR

What role did the County Planning Department have in developing the uses described in the DEIR? If in the current County General Plan Fort Ord is designated "Public" and "Semi-Public" inasmuch as it was Government land, how can the County make planning decisions for Fort Ord without adopting land use designations first, following County land use guidelines?

12

Gudrun Beck
23765 Spectacular Bid Lane
Monterey, CA 93940

August 16, 1996

To: FORA
Re: DEIR

If the coastal dunes milk-vetch, Yadon's piperia, Hickman's potentilla, Monterey clover, the Gowen cypress and the black legless lizard are listed as threatened or endangered species as reported in a recent Herald staff report, what changes will have to be made to the EIR and the ultimate Fort Ord plan? | 13

Gudrun I. Beck
23765 Spectacular Bid Lane
Monterey, CA 93940

P.S. Where in the DEIR are there any specific plans to protect threatened and endangered species as one would normally find in a DEIR? | 14

August 16, 1996

To: FORA

Re: DEIR

Figure 4.4-2 shows areas of high sensitivity for archeological resources. Except for the York School Annex (cross country track and outdoor education) and the Dunes State Park, it appears that virtually all the rest is slated for development (mixed use, business park, golf course, etc.). What are the plans to protect these archeological resources? Where in the DEIR are these spelled out?

15

Gudrun I. Beck
23765 Spectacular Bid Lane
Monterey, CA 93940

August 18, 1996

To: FORA

Re: DEIR

Where is the planning analysis that supports the proliferation of golf courses on the Monterey Peninsula? Fort Ord (Seaside) already has two golf courses. The area already has 20 or so golf courses and others approved (Bishop Ranch) or planned (Monterra, Pebble Beach). Nationwide, golf courses are proliferating as developers jump on the "popularity bandwagon" and trade "open space" for "golf course." However, studies show that golf play is no longer increasing. (Remember the popularity of tennis in the 70's, racquetball in the 80's?) Are the golf courses going to be open to the public at affordable rates? Studies also show a diminishing middle class and stagnating incomes. Golf is expensive. Where are the studies that show a growing golf clientele?

It is probably planned that these courses will use recycled water. Does that mean that they will not be built until development produces enough non-potable water to recycle for golf course use? Will the chicken come before the egg? Where is the time line? Again, where is the planning analysis?

Gudrun Beck
23765 Spectacular Bid Lane
Monterey, CA 93940

August 16, 1996

To: FORA

Re: DEIR

The DEIR shows bicycle and hiking trails on Fort Ord. As someone who walks and jogs along South Boundary Road every other day I am astonished to note that the existing, paved, safe, already widely used South Boundary Road is not a designated trail. Even if a freeway would someday be built there (God forbid), in the intervening 30 years this should surely be a designated trail. Joggers and walkers from the nearby Ryan Ranch business park use it (without having to drive to it). On a chance Saturday one might already see a bicycle race there. Bicyclists routinely challenge those steep hills all the way to Laguna Seca Regional Park. What were the hiking and bicycle clubs and associations that FORA consulted to establish the hiking/bicycle trails for Fort Ord?

Gudrun Beck
23765 Spectacular Bid Lane
Monterey, CA 93940

August 16, 1996

To: FORA

Re: DEIR

What is an HOV? It was left out of the List of Acronyms at
the back of Volume I.

| 19

Gudrun Beck
23765 Spectacular Bid Lane
Monterey, CA 93940

August 16, 1996

To: FORA

Re: DEIR

For the layman, what does the term, "fine-grained," used in
the DEIR mean?

| 20

Gudrun Beck
23765 Spectacular Bid Lane
Monterey, CA 93940

Mr. Kris Lindstrom
P.O. Box 51008
Pacific Grove, CA 93950
408-372-5989



August 19, 1996

FORA
100-12th Street, Bldg 2880
Marina, CA 93922

Subject: Fort Ord Reuse Plan Draft Environmental Impact Report (DEIR) Comments

I have reviewed the Draft EIR and have found it to be totally inadequate and contains some serious fatal flaws. Overall, it must be completely revised and recirculated as a revised Draft Program EIR. This new EIR must contain a better description of existing conditions, clearly stated goals and objectives for the project, and more clearly defined phasing of the proposed redevelopment program. A critical element missing is a constraints analysis and alternatives that are sized and phased to match the carrying capacity of the existing infrastructure (ie. water supply and transportation facilities). There is an inadequate assessment of cumulative impacts, particularly as they relate to water and transportation needs. The proposed mitigation measures are inadequate and do not reduce the significant impacts associated with the project.

General Comments

I have provided a number of detailed comments on the DEIR which need to be addressed. I have numbered these to aid in the response. There are 28 Major Comment Headings many of which include subcomments under that heading each of which needs to be addressed. Some 87 individual comments need to be addressed.

Comment 1. Draft EIR Is Inadequate at Fulfilling the Purposes of CEQA

An Environmental Impact Report(EIR) is mandated by the California Environmental Quality Act (CEQA) which was enacted in 1970. The fundamental purpose of an EIR is to provide a detailed informational document for decision making and informing the public and others about the environmental effects of a proposed project or redevelopment program that is proposed by the Lead Agency [Fort Ord Reuse Group (FORA)]. The EIR must analyze the project's (in this case a Program for redevelopment of a closed military base) significant effects on the environment and identified mitigation measures and reasonable alternatives to the project proposed that will minimize or eliminate significant environmental effects.

An EIR has three primary purposes which are:

- To inform decision makers and the public about an project's significant environmental effects and ways to reduce them.
- To demonstrate to the public that the environment is being protected.
- Ensure political accountability by disclosing to citizens the environmental

values held by their elected and appointed officials.

This document fulfills none of these purposes in accordance with the published CEQA Guidelines.

Comment 2. Use of a Program EIR is Not Fulfilling CEQA Mandates

2

The attempt to obtain approval for the Fort Ord Reuse Plan using a Program EIR has been misused and abused in this case. A program EIR is an EIR which may be prepared on a series of actions that can be characterized as one large project and are related either geographically, a logical part in the chain of contemplated actions, in connection with issuance of rules, regulations, plans or other general criteria to govern the conduct of a continuing program, or as individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways.

Use of a program EIR is supposed to provide the following advantages:

- (1) Provide an occasion for a **more exhaustive consideration of effects and alternatives** than would be practical in an EIR on an individual action,
- (2) **Ensure consideration of cumulative impacts** (i.e. water supply needs and transportation improvements) that might be slighted in a case-by-case analysis,
- (3) Avoid duplicative reconsideration of basic policy considerations,
- (4) Allow the Lead Agency to consider broad policy alternatives and programwide mitigation measures at an early time when the agency has greater flexibility to deal with basic problems or cumulative impacts, and
- (5) Allow reduction in paperwork.

Subsequent activities in the program must be examined in the light of the program EIR to determine whether an additional environmental document must be prepared. It must be clearly stated which activities FORA is responsible for and those of other agencies. Activities of other agencies cannot be used as mitigation measures.

A program EIR will be most helpful in dealing with subsequent activities **if it deals with the effects of the program as specifically and comprehensively as possible**. With a good and detailed analysis of the program, many subsequent activities could be found to be within the scope of the project described in the program EIR, and no further environmental documents would be required.

A Program DEIR such as the one now under review for the FORA redevelopment of Fort Ord is supposed to provide an overview of the impacts of the proposed redevelopment program providing the **best available information**. The DEIR must examine **all phases of the project including planning, construction and operation and must evaluate reasonably foreseeable future phases**. It fails to do this and defers much of the needed detail to other agencies or entities. A detailed matrix showing what agencies are assuming responsibility for mitigation must be developed. This must contain the timing, costs, commitment and standards against which success will be judged.

This project is the largest single development proposal ever proposed on the Monterey

Peninsula in terms of its environmental impacts and areal coverage. As such, it deserves more scrutiny and more environmental evaluation than other projects. This EIR fails to do the job needed for such a significant proposal.

Comment 3. Significant Impacts are Not Mitigated

3

CEQA requires more than merely preparing environmental documents. The EIR by itself does not control the way in which a project can be built or carried out. Rather, when an DEIR shows that a project would cause substantial adverse changes in the environment, then FORA or the implementing agencies MUST respond to the information by one or more of the following methods:

- (1) **Changing** a proposed project;
- (2) **Imposing conditions on the approval of the project to minimize or eliminate significant environmental impacts;**
- (3) Adopting plans or ordinance or specifications to control a broader class of projects to avoid the adverse changes;
- (4) **Choosing an alternative way of meeting the same need;**
- (5) **Disapproving the project;**
- (6) Finding that changing or altering the project is not feasible;
- (7) Finding that the unavoidable significant environmental damage is acceptable and adopting a statement of overriding considerations as provided in Section 15093.

The use of overriding considerations should only be considered when there has been a exhaustive effort to analyze feasible impacts that can be implemented with minimal impacts on the environment and mitigation measures are not feasible.

Given the lack of clearly defined project objectives which can be quantified, the use of any statement of overriding considerations based on "economic recovery or "infeasible alternatives" cannot and should not be considered by FORA.

Comment 4. There is a Lack of Viable Alternatives Presented in the DEIR

4

There is a complete lack of reasonable alternatives presented which provide a range of reasonable "economic recovery" scenarios. This may be due to a lack of defined project objectives which is a prerequisite to initiating any EIR process. What are specifically lacking is/are alternative/alternatives that are based on the limitations of the existing infrastructure and water supply for the project area. This includes transportation facilities. An alternative which is limited by the constraints of existing infrastructure or support facilities would serve as an alternative to the No Project Alternative and may be environmentally superior to any of the presently proposed development alternatives..

An adequate baseline NO PROJECT alternative needs to be defined for which "existing environmental impacts (water use, traffic, jobs, energy use, air pollutant emissions, solid waste generation, sewage generation, etc.) are defined.

5

There is no discussion of the economics associated with the differences between the

6

various alternatives. Such a discussion is needed as determined in (Burger vs Mendocino County, 1975), a famous court case setting a precedent for CEQA and EIR adequacy.

The purpose of CEQA is to serve the public at minimal environmental expense. The development of a reasonable set of alternatives that are feasible and minimize environmental damage. This has not been done for the Fort Ord Reuse Plan and DEIR. An alternative is needed which is sized and configured to make maximum use existing facilities without the need for significant new improvements or expenditures of hundreds of millions of dollars. Such an alternative would be limited by the maximum sustainable yield of groundwater to existing wells (existing water supply of about 6600 afy). It is an obligation of the project proponent (FORA) to produce detailed, concrete evidence showing that such a less damaging alternative is utterly impractical (Citizens of Goleta Valley v. Board of Supervisors (2nd District 1988) 197 Cal. App. 3d 1167 [243 Cal. Rptr.339].

7

Comment 5. There is a Lack of Mitigation Measures

8

According to State EIR guidelines, a mitigation measure must:

Avoid the impact all together by not taking certain action or parts of an action.

Minimize impacts by limiting the degree or magnitude of the action or its implementation.

Rectify the impact by repairing, rehabilitating, or restoring the affected environment.

Reduce or eliminate the impact over time by preservation and maintenance during the life of the action.

Compensate for the impact by replacing or providing substitute resources or environments.

The DEIR must say how each of the measures proposed accomplishes the above using same five descriptive terms. The current DEIR does not do this and the measures proposed are vague and unquantifiable.

Comment 6. Programs and Policies are Cited as Pseudo-Mitigation Measures

9

To be considered adequate and feasible, mitigation measures should be **specific actions that will actually change adverse environmental conditions**. Mitigation measures should be specific enough to allow monitoring their implementation. Measures consisting only of further studies, or consultation with regulatory agencies (most of the proposed mitigation measures are required by law already that are not tied to a specific action plan, may not be adequate and should be avoided.). Policies and programs specified throughout the EIR are implied to be measures to reduce environmental effects, but are NOT tied to project approvals or required prior to project approvals. This is NOT in keeping with the requirements of CEQA.

↓

I have specific comments on key programs and policies which illustrate the point and indicate a need for detailed responses in order to clarify the intent of each program and policy which is being proposed to reduce environmental effects as cited in Table 2.5.1 Comments for pseudo mitigation proposed on page 4-43 of the Conservation Element: (Bold is proposed policy or program to be adopted by FORA? followed by me questions/comments that need to be addressed in a revised DEIR):

Hydrology and Water Quality Policy B-1: The City/County shall ensure additional water to critically deficient areas.

Comment 6A - How will the City/County ensure additional water? 10

Comment 6B - What are the specific measures, timing, financial implications, environmental impacts, and water fees for hook-ups and monthly service? 11

Comment 6C - How will this be unenforced and implemented? 12

Program B-1.1: The City/County, with input from the MCWRA and MPWMD, shall identify potential reservoir and water impoundment sites on the former Fort Ord and zone those areas for watershed use, which would preclude urban development, 13

Comment 6D - What interagency agreement will be adopted to mandate that this occur?

Comment 6E - Who is going to fund the studies?

Comment 6F - When will they be done?

Comment 6G - Once these sites are identified what action will be taken to preclude urban development?

Comment 6H - What is the timing for the studies and zoning changes?.

Program B-1.2: The City/County shall work with the appropriate agencies to determine the feasibility of developing additional water supply sources for the former Fort Ord, such as water importation and desalination, and actively participate in implementing the most viable options(s). 14

Comment 6I - What interagency agreement will be adopted to mandate that this occur?

Comment 6J - Who is going to fund the studies?

Comment 6K - When will they be done?

Comment 6L - What agreements to implement will be adopted?

Comment 6M - What if the supplies are not available or feasible? Will development be halted?

Program B-1.3: The City/County shall adopt and enforce a water conservation ordinance, which includes requirements for plumbing retrofits and is at least as stringent as Monterey County's ordinance, to reduce both water demand and effluent generation. 15

Comment 6N - What type of goals are being set for water conservation?

Comment 6O - What interagency agreements are being developed?

Comment 6P - Who is going to fund the enforcement programs?

Comment 6Q - When will the ordinance be adopted and what will it cost to develop

and implement?

Comment 6R - When will the conservation activities be done and how will it impact the development of water supply and wastewater treatment?

Hydrology and Water Quality Policy B-2: The City/County shall condition approval of development plans on verification of an assured long-term water supply for the projects.

16

Comment 6S -Who will enforce this?

Comment 6T - Who will be responsible for verification that the supplies are assured and available?

Comment 6U - When is this conditional approval triggered?

Comment 6V - The safe yield from the existing basin is still not known, so how can any development be approved that would result in the safe yield being exceeded?

Hydrology and Water Quality Policy C-3: The City/County shall prevent further seawater intrusion, to the extent feasible.

17

Comment 6W - This is really weak. What is the extent feasible?

Comment 6X - How much will be spent to mitigate against seawater intrusion?

Comment 6Y - As long as new wells are being drilled and the aquifer is pumped at a rate greater than it is recharged, it will never be prevented. I would like to see the typical 5 year water balance figures for the watershed area. How much recharge will occur versus pumping in 2015?

Comment 6Z - There needs to be planned recharge program with no overall depletion of groundwater (mining where withdrawals exceed recharge on an annual or five year basis). There needs to be specific numeric goals of maximum withdrawal rates determined based on well levels, recharge rates, extraction quantities, rainfall, etc. A suggested program needs to be developed and presented in the revised DEIR.

Program C-3.1 : The City/County shall work with the MCWRA and MPWMD to estimate the current safe yields of those portions of the former Fort Ord overlying the Salinas Valley and Seaside groundwater basins to determine available water supplies.

18

Comment 6AA -The safe yield figures should have been used as a basis for planning and need to be determined NOW!

Comment 6BB - Base redevelopment needs to be founded on keeping within the sustained yield of existing wells until new supplies of water are developed. Existing yield and uses need to be determined and compared against future demands.

Comment 6CC - Until safe yields and existing uses are known, the NO PROJECT alternative is the only rational choice. Please explain why this is not presented in the DEIR and how it will be addressed in the revised DEIR.

Program C-3.2: The City/County shall work with the appropriate agencies to determine the extent of seawater intrusion into the Salinas Valley and Seaside groundwater basins and shall participate in developing and implementing measures to prevent further intrusion.

19

Comment 6DD - What interagency agreement will be adopted to mandate that this occur?

Comment 6EE - Who is going to fund the studies?

Comment 6FF - When will the work be done?

Comment 6GG - How will the findings be used to develop a regional plan?

Comment 6HH - As long as new wells are being drilled and the aquifer is pumped at a rate greater than it is recharged, it will never be prevented. I would like to see the typical 5, 10, and 25 year water balance figures for the watershed areas mentioned above in Program C-3.2.

Comment II - There needs to be planned recharge program with no overall depletion of groundwater (mining where withdrawals exceed recharge on an annual or five year basis). There needs to be specific numeric goals of maximum withdrawal rates determined based on well levels, recharge rates, extraction quantities, rainfall, etc. A suggested program needs to be developed and presented in the revised DEIR. The feasibility and impacts of such a program need to be described along with the costs and who will implement it.

Comment 7. Performance Standards for Mitigation Measures Must be Developed and Presented in a Revised DEIR.

20

Performance standards are needed to assure that an agency implements the type of measures which are described in the DEIR. These must be based on providing funding for something, hiring staff, and conducting a monitoring and reporting program for each type of measure as well as complying with applicable regulations.

Comment 8. FORA needs to Develop Memorandums of Understanding with Other Agencies and Get Commitments to Enact Proposed Programs and Policies Before Plan is Approved and the EIR is Certifiable.

21

Inadequate measures are those that require consulting with another agency, submitting something for review, coordinating with another agency, studying something further, informing, encouraging, facilitating or striving to reach a goal.

A good mitigation measure should clearly explain its objectives, specify how it will be implemented, state who is responsible for implementation, where it will occur and when. The measures in the Fort Ord Reuse DEIR do not do this. They are inadequate or are simply a statement of what has to be done under the law to obtain project approvals from other agencies (Water Quality Control Board, Air Quality Management District, Coastal Commission, etc.)

22

For example, the following comments are provided for Policy and Program elements designed to specifically address the needed actions required to mitigate the significant adverse impacts associated with providing the augmented water supply required to implement the proposed program addressed in the DEIR. These various policies and

programs have been implied to be mitigation for Hydrology and Water Quality as proposed on page 4-43 under the Conservation Element. However, the EIR very cleverly misleads the reader (intentionally I contend) into thinking that the programs and policies will be enacted and carried out as proposed). If they are not adopted as mitigation measures and agreed to by the Cities and County, then they are meaningless. This is exactly what the 5th District Appellate Court said recently in the case Stanislaus Natural Heritage Project, Sierra Club versus County of Stanislaus (Diablo Grande Limited Partnership)] Case No. F023638 of August 8, 1996.

It is a violation of CEQA to approve a project on the condition that mitigation measures be developed and implemented at a later date. Deferral of environmental assessment (i.e. future water supply impacts) until after a project (or Program EIR) is approved (or certified) violates CEQA's policy that impacts must be identified before project momentum reduces or eliminates the agency's flexibility to subsequently change its course of action (Sundstrom v. County of Mendocino (1st Dist. 1988) 202 Cal. App. 3d 296 [248 Cal.Rptr. 352]).

23

Comment 9 - Water Quality Impacts are Not Adequately Addressed

I have commented on the Conservation Element and Impacts on Hydrology and Water Quality in Comment 6. Page 4-43-44 contains the Only Mitigation for this critical project constraint.

24

Then the EIR proposes mitigation for STORMWATER MANAGEMENT ONLY as follows:

Write a program to be adopted by the Cities of Marina and Seaside and the County of Monterey prior to implementing the proposed project that states: the City/County shall adopt and enforce a stormwater detention plan that identifies potential stormwater detention design and implementation measures to be considered in all new development, in order to increase groundwater recharge and thereby reduce potential for further seawater intrusion and augment future water supplies.

Comment 9A - This proposed is too general and no specifics are provided. When will program be written and adopted?

Comment 9B -What numeric goals have been set for detention?

Comment 9C - How will it be recharged?

Comment 9D - What locations?

Comment 9E - What will be the measures of effectiveness at reducing seawater intrusion?

Comment 9F - How will it augment future water supplies?

Comment 9G - How much recharge or retention is proposed?

Comment 9H - What evidence is there that it will work and be effective?

Comment 10. Water Supply is Inadequate to Support Long-Term Project Needs - A Significant Impact that is Not Mitigated.

Comment 10A - The EIR does not adequately address the removal of limiting constraints to the proposed growth beyond the year 2005 as exists for the needed water supply. Projected water needs need to be matched with project phasing -

25

please comment on how these will be matched.

Comment 10B - The EIR states that "a number of reasonable, new water supply sources have been identified to support the proposed project, including the siting of an on-site desalination plant". These should be defined in more detail if indeed they are reasonable. The specific alternatives for providing water should be identified and their feasibility assessed. Just stating that desalination facilities will be constructed in the future by some entity is not adequate for basing approvals. Past local experience has shown that large desalination facilities are not financially feasible and there are significant environmental impacts associated with implementing new water supply projects which are not addressed. To state that the impacts associated with development of new water supplies can be mitigated by future work is not adequate mitigation. 26

Comment 11. There is No Adequate Mitigation to Address the Significant Cumulative Impact of a lack of Water to Meet Project Demands. 27

The water need for the proposed redevelopment program needs to be put into perspective with the other regional growth forecasts and projections of where the water supply for the County will be obtained.

Comment 11 A - The EIR uses the programs and policies (cited in Comment 6 and 6A through I above) as mitigation for the significant impacts associated with the lack of water supply. This is not legal (See Stanislaus Natural Heritage Project, Sierra Club versus County of Stanislaus (Diablo Grande Limited Partnership)] Case No. F023638 of August 8, 1996.) Please discuss why the programs and policies were used in an attempt to avoid mitigation of significant impacts? 28

According the DEIR, "These programs and policies serve to define the local jurisdictions' involvement in future water supply planning for former Fort Ord, identify potential water supply sources on- and off-site, and affirm the local jurisdictions' commitment to preventing further harm to the local aquifers. They also ensure that water supply remains the primary constraining factor for ultimate buildout of the proposed project, by limiting development in accordance with the availability of secured supplies. However, these programs and policies do not adequately address groundwater recharge; therefore, the following mitigation measures have been recommended for consideration."

The current water supply yields which served the former Fort Ord area are clearly inadequate to handle the future needs generated by the proposed project which proposes a three-fold increase in water use.

The mitigation measures proposed to deal with the shortage of water supplies are NOT ADEQUATE.

Comment 11B - The above cited program and policies are not designated mitigation measures and have not been formally designated as such, thus they do not diminish the significant impact of a lack of water supply. These policies and programs need to be formalized through interagency agreements and funding commitments to implement them as mitigation measures. The work needs to be done before the development 29

plans can proceed. This is a fatal flaw in this Program DEIR and render it totally inadequate and legally deficient. There is no effort made to remove a limiting constraint to development and mitigation is deferred into the future with other parties, not the Lead Agency.

Comment 12 - More Realistic Project Alternative/s Need to be Developed that Are Based on Minimizing Adverse Environmental Impacts.

30

A project alternative/s needs to be defined which is based on meeting the objectives of SB899 based on the use of existing infrastructure and most importantly, water supply. Quantitative goals for "economic recovery" need to be defined and endpoints for their realization determined as a means of identifying success of the redevelopment project. As presently proposed, this program goes way beyond what I would call "economic recovery". This is a growth enhancing program that is not feasible based on the lack of water and vital transportation facilities. The DEIR admits this, but then goes on to say that the various programs and policies cited will resolve the issues and mitigate the impacts. There is no information presented to substantiate that water supplies can be tripled and that hundreds of millions of dollars will be found to build new roads and transportation facilities. The DEIR lacks reality given recent past experience with other major projects (Los Padres Dam, Hatton Canyon Freeway, etc.).

Comment 13 - The Present Environmentally Superior Alternative is Poorly Defined

31

The present environmentally superior alternative is based on a poorly defined no project alternative that does not fulfill project objectives for economic enhancement (as stated in the DEIR). The DEIR does not look at a wide range reasonable alternatives (See Comment 12)

Comment 14 - Need a Realistic Environmentally Superior Alternative that Can Full Defined Project Objectives

32

A key point lost in this EIR is the identification of a realistic environmentally superior alternative. The EIR fails to identify a logical environmentally superior alternative that is logically defined by the existing water supply as determined by the sustainable yield of existing groundwater resources.

Comment 15 - Traffic and Circulation Analyses are Incomplete

Comment 15A - Does not depict existing daily traffic and Level of Service to be used to evaluate baseline conditions against modeled future conditions. There is no analysis of the impacts of traffic on the existing environment.

33

Comment 15B -The proposed mitigation measures do not identify the agencies responsible for implementation and monitoring nor do they indicate the degree to which the proposed measures would reduce impacts below a level of significance.

34

Comment 15C - The Financially Constrained Scenario assumes that many off-site improvements are made independently of the Fort Ord EIR modeling and are not currently included in the region Metropolitan Transportation Plan. The assumptions used in the modeling work done are not consistent with the State Implementation Plan for air quality for the Monterey Region.

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Comment 15D - The EIR states (page 4-85) that "It is clear that the redevelopment of former Fort Ord, plus growth throughout the remainder of Monterey County and the region, would significantly increase the demand placed on the region's transportation infrastructure and services." To help alleviate the significant impacts due to the deterioration of LOS on regional roadways, mitigation is proposed on page 4-86 which would amend Street and Roads Policy A-1.2 to add the following wording: "FORA shall review the options for distributing its financial contributions to all or selected off-site transportation improvements so as to maximize the effectiveness of these contributions in reducing impacts to the regional roadway system." This is inadequate since no analysis of options, priorities, financial needs, potential funding, etc are described. More quantification and discussion of what specific improvements and the possible levels of funding involved should be discussed and more specific estimates given for the dollar amounts by year into the future.

36

Comment 16 - Air Quality Analysis Inadequate

Comment 16A - The present AQMP accounts for growth projections at Fort Ord through the year 2005 only. On page 4-94 there is a statement made that emission credits are available for offsetting growth. I do not believe this is true.

37

Comment 16B - The EIR needs to look at quantification of emissions from the proposed project, element by element, roadway by roadway, and trip-generation element by element and list these emissions. These should then be compared to existing emissions and regulatory standards and emission thresholds to determine their significance.

38

Comment 16C - Based on the results of analyses requested in Comment 16B, specific mitigation measures and their effectiveness should be identified and a matrix showing how these measures would reduce emissions should be prepared.

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Comment 16D - Who is responsible for implementing the mitigation measures and when and how they will be implemented? This needs to be discussed in detail.

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Comment 16E - Cumulative impacts need to be quantified and used in making a consistency determination for compliance with the existing Air Quality Implementation Plan as required by CEQA. This consistency determination should be addressed along with the above requested information on impacts in a revised EIR.

41

Comment 16F - Another flaw is stating that Air Quality Policies (A-1 through A-3 on page 4-98) of the EIR apply, but they are not made specific mitigation measures to be implemented by the Cities of Seaside and Marina.

42

Comment 17 - University of California at Monterey Bay Education, Science and

Technology Center (UCMBEST) UCMBEST Inadequately Described and Impacts are Not Assessed to the Degree Necessary

Section 4.13 of the EIR addresses the University of California at Monterey Bay Education, Science and Technology Center (UCMBEST) which is currently utilizing 950 acres of 1,187 acres which the Army has screened for transfer to UC. Of this total, some 436 acres is available for development with between 5.0-7.4 MILLION SQUARE FEET of development. The project specific impacts are left undescribed and the reader is told that UC Santa Cruz may address these as needed in the future. It states: "UC may assume that they would carry some responsibility for mitigation in all the impact types identified below where significant or potentially significant impacts may occur" The impacts are identified in Table 4.13.1 for the "Project Impacts" . THIS IS A TOTALLY INADEQUATE DESCRIPTION OF IMPACTS AND THERE IS NO QUANTIFICATION OF THE IMPACTS OR HOW THEY WILL BE MITIGATED FOR THE UCMBEST COMPLEX.

43

Comment 17A - Water Needs for Project - it is implied that the supplies will be derived from wells (Table and the impact is only described as potentially significant. Mitigation refers to well standards and runoff, nothing about meeting supply needs. THIS IS TOTALLY INADEQUATE.

44

Comment 18 - Project Objectives Are Not Well Defined or Quantifiable

An important aspect to the CEQA EIR process is an adequate project description containing the project objectives, or project goals. Project objectives are revealed in the DEIR on pg 2-6, that is:

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...."developing an economic/employment recovery to compensate for base closure" and "..accommodate regional growth."

These two DEIR project objectives are not consistent with the four goals in SB 899 (the state law that created FORA and creates the minimum requirements for our local reuse plan [Title 7.85 Chapter 1 Sec 67651li- The four SB 899 goals are:

.. to facilitate the transfer and reuse of. . . Fort Ord with all practical speed and
...to minimize the disruption caused by the base's closure on the civilian

The DEIR project objective "...of developing an economic/employment recovery to compensate for base closure..." leads the reader to believe that there is substantive information in the DEIR or other accompanying documents to prove that there is, in fact, something to "recover from". My concern is that the need to "recover" will be used to justify the 72,000 person city [Vol 1 pg 3-44] as the means to "recover economically", i.e., it will be used as an overriding consideration to justify the significant negative impacts of this project. This will be legally challenged by the public.

Comment 19 - Economic Recovery Goals Not Quantified

Where is data provided regarding the base closure and its direct, measurable

46

economic impacts on any surrounding community? If no data exists in the DEIR to provide substantial evidence that there is need for "economic recovery" this language should be deleted from consideration.

Comment 20 - A Revised Draft EIR Should be Prepared

A revised draft EIR should be prepared that retains the intent of SB 899, i.e., "... minimize the disruption...on the civilian economy..." and " provide for the reuse and development...in ways that enhance the economy and quality of life...and maintain and protect the unique environmental resources of the area." 47

Comment 21 - Economic Data Need to Assess Project Objectives and Goals

Full disclosure is a basic component of CEQA. To assure adequate need for the project, each FORA member, the 8 cities and the County of Monterey, must provide economic information for the each fiscal year ending 1989 and 1995 (i.e., for a fiscal year prior to Fort Ord's closure and for a recent fiscal year for which data is available). For perspective, data must be provided for the City of Watsonville (a city of 30,000 people, somewhat distant from the base closure). This will help address the more regional issues of agricultural sales and recession effects. 48

The following data must be provided along with the source of the information for verification purposes: City/County general budget; sales tax; number of employed/unemployed; school enrollment. This data should be provided to the public at the FORA meeting in September and should be included in a revised draft EIR.

The document indicates that "peak employment" at Fort Ord was 17,700 military and 2,700 civilians [Vol 2 pg 4-83]. The DEIR project objective of "...developing an economic/employment recovery to compensate for base closure" [pg 2-6] leads me to believe that the 20,000 Fort Ord "jobs" must be " recovered " in order to " recover economically " However, there is a difference that the military jobs are much different than the "new" jobs that are proposed in the plan. AMBAG can provide technical data about the difference between military and regular civilian jobs. Again, it is my concern that the supposed need to "recover" 20,000 "lost" jobs will be used as an overriding consideration to justify the significant negative impacts of this proposed project. Any attempt to use "employment recovery" as an overriding consideration will be challenged.

Comment 22 - Reasonable Range of Project Alternatives is Lacking.

CEQA demands that an EIR examine a reasonable range of project alternatives. The DEIR discusses its set of unusual project alternatives beginning on pg 2-6 and 6-1. Both of the supposed environmentally superior alternatives are rejected, in part, because creating 26,000 new jobs doesn't meet the project objective of "recovering" from the "loss" of 20,000 jobs, No substantive data is provided to support this opinion. 49

Comment 23- Project Must be Found to Be Growth Inducing

This proposed project is growth inducing as defined by CEQA and if used as a project 50

alternative in a revised draft EIR, should be identified as such.

Comment 24 - Seawater Intrusion Data Needed

Comment 24A - In the initial study stages of the preparation of the DEIR, requests were made for up to date data regarding the status of the seawater intrusion underlying the base in both the 180' and 400' aquifers. No current accurate estimates are provided. The last data was made available in the Dec '90, DEIR/S for the Sea Water Intrusion Program, pg S-4-, Figure S-2, reflecting data recorded in 1985. The document went on to state that "...assuming a rate for seawater intrusion at the base of 500 feet per year, a new well field would be adversely affected in 15 years [the year 2005]." An unsubstantiated opinion is stated on DEIR pg 4-4-5 that [seawater] "intrusion has slowed if not stabilized" Current information on the chloride levels in wells at Fort Ord needs to be either presented or collected from appropriate wells for inclusion in a revised draft EIR.

51

Comment 24B - Sea water intrusion is allegedly caused by overpumping the existing groundwater aquifer. The Army's Draft Supplemental Environmental Impact Statement, Dec '95, pg 4-8, states that Army's water use averaged 5,100 AFY during 1986-1989 and was 3,235 AF in 1994. The DEIR states that "...recent pumpage in former Fort Ord exceeded safe yield in the 180-foot and 400-foot aquifers , as indicated by seawater intrusion. . . " . The DEIR contains no information about safe yield and is inadequate. Such information is vital and should be included in a revised DEIR.

52

Comment 25 - Current Water Use Data Needed

The DEIR provides no data on current water use on the former base. The EIR is inadequate unless baseline conditions are adequately quantified. How much water was pumped from the East Garrison wells in 1995? What was the residential population at the POM and CSUMB and what other users existed on the base?

53

Comment 26 - Current Water Supply Use and Supply Loss Data Needed

Are all users are now metered? Provide substantial evidence about water waste and line loss at the base which is estimated to be about 10% in the EIR. Provision of this data in a revised draft EIR is critical, because, the current document leads the reader to believe that a full unused 6,600 AF of water awaits FORA's reuse activities [pg 4-4-2]. This simply is not accurate since some water is already in use. There may also be water waste and/or severe line loss occurring. These important, basic facts must be disclosed in any adequate EIR.

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Comment 27 - Description of How New Water Supplies Will Be Obtained is Needed

The proposed project needs an estimated 18,000 AF of water. The estimated safe-yield of groundwater may supply, at best, only 1/3 of that water. The DEIR makes an unsubstantiated and undocumented assertion [pg 4-43 and 4-44 that "Because a number of reasonable, new water supply sources have been identified to support the proposed project, including the siting of an on-site desalination plant assuming policies, programs and mitigations...the increased demand for water would be

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considered a less than significant impact at the project level. " The DEIR further states [pg 5-4] that "Cumulative development would increase the demand for...water distribution services...[and] would be mitigated by the capital improvements and policies and programs...The cumulative demand for these services would not be considered a significant impact. "

The "reasonable, new water supply sources" are described in the following twenty-five words [4-42]: "Other water supply sources being considered include an on-site desalination plant, on-site recharge ponds, on-site storage facilities, and the importation of water from other sources

The draft EIR provides no substantive information about any of the water projects needed by the reuse plan. These twenty-five words are the substance of all data regarding this critical issue,

The public and the FORA board members MUST be given more information on how such supplies will be provided given the recent history in which development of new water supplies has had significant impediments. The lack of detailed discussion of alternatives and their impacts or feasibility is a fatal flaw in the DEIR. Given the level of information that is available (MPWMD Feasibility studies on desalination for instance) the lack of full disclosure in this DEIR fails to fulfill the requirements of CEQA.

Comment 27 - Water Supply Needs Are Not Identified Other Than Through Proposed Stormwater Management Program Recommendations Cited as Mitigation Measures in Table 2-5.

Comment 27A - The DEIR provides no information as to what type of water is to be recharge, how it is to be recharged, or for what purpose. This is alluded to repeatedly as a mitigation measure in combination with assuring that wells are drilled to meet State standards. This is NOT ADEQUATE DISCLOSURE OR MITIGATION.

56

Comment 27B - The phrase "on-site storage facilities" does not describe what type of water is to be stored, in what manner, and for what purpose. There is a reference [Vol 2 pg 4-158] that the future selection of reservoir and water impoundment areas could "preclude [urban] development". If this is true, then the total number of future homes and office parks need to be reduced in order to provide for critical infrastructure. Such refined alternatives or mitigation measures must be reflected in the DEIR. The DEIR is inadequate and needs to be revised.

57

Comment 27C - No estimate of the volume of water needed from the proposed desalination plant is provided. No information is provided about the feasibility of outfall and intake pipelines extending into the Monterey Bay National Marine Sanctuary. No data is provided as to the feasibility of Ranney collectors and reinjection pipelines or whether there is sufficient space on the beach to support the required distances between a certain number of galleries for intake of seawater or disposal of brine. No environmental impact data is provided for the plant construction, operation or discharge of toxic brines. The DEIR is inadequate.

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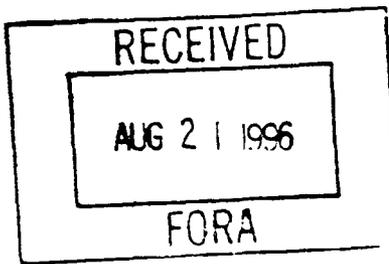
Comment 27D - The DEIR fails to disclose the method of importing water proposed as a means of providing adequate water to support the program. The source of the imported water, the costs and the environmental impacts of constructing a transfer system are not addressed. The DEIR is inadequate and must be revised. 59

Comment 27E - The DEIR states [pg 2-9 Table 2.4-2] that alternatives R, 7 and 8 are "inconsistent" with policies regarding groundwater. What are the policies about groundwater? 60

Comment 28 - The Draft EIR is inadequate and needs to be Reissued as a Revised Draft EIR for recirculation. 61

Respectfully submitted,


Kris P. Lindstrom



Jennifer Serttunc
52 Mar Vista Drive
Monterey, CA 93940
(408) 649-0371

Jack Barlich,
Chairman
Fort Ord Reuse Authority
100 12th Street
Building 2880
Marina, CA 93933

Dear Mr. Barlich:

August 20, 1996

Thank you for the opportunity to provide public comments about the proposed Fort Ord Reuse Plan. I was delighted to see that, with the exception of the resort in Marina, the land along the coast will be preserved as California State Parkland. If any of the area will be developed, the site of the proposed resort in Marina is the best place for a low-rise building. It would help the economy in Marina. I was also pleased to read that there will be planned communities comprised of one and two-story buildings with adequate open space. I have only three concerns about the reuse plan. My first concern is that the goal to invite a community of 71,700 is too large. My second concern is that the plan indicates a desire to use the Monterey Peninsula as an extension of "Silicon Valley" of Santa Clara County. My third concern is that the proposed housing developments are too dense.

After having lived in three university towns, I believe that an enrollment of 10,000 to 15,000 students would be better for the Monterey Peninsula. No matter how attractive the campus of CSUMB will be, the natural beauty of Monterey and Carmel will lure students, staff, current residents, and visitors to the beaches, downtown areas, and the trails in and around Monterey and Carmel. There will be overcrowding.

The authors of the FORA plan state that the goal of human resources personnel is to "identify and implement projects which have the potential of hiring local community residents." In addition, "such job growth would not only replace the approximately 20,000 - 21,000 jobs lost as a result of the Fort Ord closure, but would add 58,000 - 59,000 jobs." The goal should be to replace the population of the former army base and add an additional 5,000 people because the peninsula residents need jobs and there is a lot of land at Fort Ord; however, I remember when the army was active at Fort Ord. Monterey was very crowded. I believe that under the current plan of having 71,700 more people, Monterey will be overcrowded.

Along these lines, I enjoy living on the Monterey Peninsula as opposed to living in Santa Clara County where there are more jobs and more high paying jobs, but the quality of life is nothing like it is currently on the Monterey Peninsula. The parts of the plan that I do not like are the statements such as "Santa Clara County firms have absorbed an annual average of between 2.5 and 3.0 million sq. ft. of office/R&D space within the county between 1980 and 1995. Successful firms are continually evolving, requiring new space for their changing needs and setting up new divisions that can

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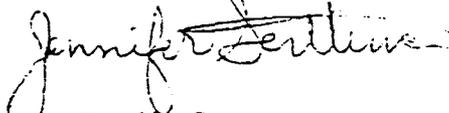
operate away from corporate headquarters." If the plan is to encourage this Santa Clara and Monterey County tie and expand roads as physical links between the former Fort Ord and Silicon Valley, then I hope the residents of the Monterey Peninsula will prepare themselves for some of the problems that accompanied the rise of Silicon Valley. These problems include stressful jobs, which have increased cases of abuse in San Jose, noise pollution, and air pollution. Monterey is beautiful for what it has as well as for what it does not have.

Although I am pleased that the plan addresses the needs for more affordable housing on the Monterey Peninsula, I would like to see something truly daring and innovative in the design of the neighborhoods. Specifically, I would like to see densities of four units per acre rather than the proposed "densities of six to eight units per acre." I realize it is considered more cost effective to build houses so close together. Most of the new housing developments in California suffer from this trend. It benefits the builders, but the people who work to buy a new house deserve to have some land along with it. There is enough usable land at Fort Ord to build housing developments which people can enjoy more than they would the existing planned housing developments with houses that are too close together.

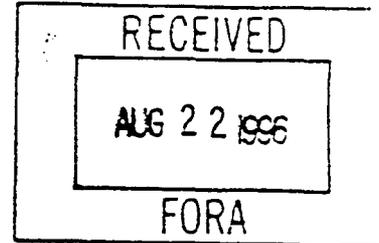
In conclusion, I agree with the reuse plan in the areas of keeping state parkland along the coast, encouraging natural habitats, and designing planned communities with one or two-story buildings. I would like to see the following changes made to the plan: 10,000 - 15,000 student enrollment at CSUMB; replacing the former population of Fort Ord with an additional 5,000 people rather than a total of 71,770 people; not encouraging the physical connection via expanded roadways of Silicon Valley and the Monterey Peninsula; and, building affordable houses at densities of four units per acre.

Thank you for your time and your consideration.

Sincerely,


Jennifer Serttunc

August 20, 1996



Les White, Executive Director
Attention: Ann Hebenstreit
Fort Ord Reuse Authority
100 12th St. Bldg. 2880
Marina, CA 93933

RE: MCH# 079608 - *Draft Environmental Impact Report for the Fort Ord Reuse Plan*

Dear Mr. White:

Thank you for providing AMBAG staff the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Fort Ord Reuse Plan. Our staff review of this document and the Draft Fort Ord Reuse Plan itself has resulted in these general comments, and the attached specific comments. References to the DEIR are shown in brackets.

General Comments on the DEIR

1. Is the water constrained alternative addressed in the proposed project or in any of the alternatives of the Draft EIR?
2. The mitigations proposed leave unmitigated a number of significant direct adverse impacts to public safety services and traffic congestion (see also the next general comment), as well as cumulative adverse impacts to water supply, public safety services, traffic congestion and visual resources.
3. Given federal requirements (Metropolitan Planning and Statewide Planning; Clean Air Act Transportation Conformity final rule) for regionally significant transportation investment to be planned and programmed by AMBAG in a manner that is constrained by reasonably available and committed funding for transportation, the DEIR's "optimistic funding" traffic mitigation measures are unlikely to meet federal requirements for inclusion in AMBAG's metropolitan transportation plan and programs, and hence are not necessarily feasible. Without those "optimistically funded" mitigations, the traffic impacts noted under the "constrained scenario" [Table 4.7-3, p. 4-79] become the project's unavoidable traffic impacts, and should be identified as such.

4. As documented in the DEIR, certification and adoption by FORA could allow development to cause significant regional adverse environmental impacts beyond the year 2015. The impacts would result from both the magnitude of redevelopment proposed, and the inability to fully mitigate all impacts. The plan should either be downsized to reduce impacts, the DEIR should be revised to require mitigation of the identified impacts, or the FORA Board of Directors should be prepared to make findings of overriding considerations. 4

Thank you again for the opportunity to comment on this Draft EIR.

Sincerely,



Nicolas Papadakis
Executive Director

cc:

Bob Verkade, U.S. Army Corps of Engineers
Bob O'Laughlin, Federal Highways Administration
Bob Hom, Federal Transit Administration
Ken Nelson, Caltrans District 5, Attn: G.K. Laumer
Doug Quetin, Monterey Bay Unified Air Pollution Control District
Gerald Gromko, Transportation Agency for Monterey County
Linda Wilshusen, Santa Cruz County Regional Transportation Commission
Max Bridges, Council of San Benito County Governments
Frank Lichtanski, Monterey Salinas Transit
Scott Galloway, Santa Cruz Metropolitan Transit District
Brad Hagemann, Central Coast RWQCB
Tami Grove, California Coastal Commission - Central Coast District
Dr. Maggie Fusari, University of California Natural Reserve System
Steve Addington, Bureau of Land Management

Specific Comments on the DEIR

4.1 & 4.7 Land Use and Traffic/Circulation:

5. [4-25, ¶ 2] The word “substantially” should be removed from the statement that the Reuse Plan 2015 buildout would result in a Fort Ord population “substantially lower than the Association of Monterey Bay Area Government (AMBAG) projections for former Fort Ord at 2015”. The Plan’s 2015 population of 38,859 residents, including CSUMB students, is less than AMBAG’s adopted 44,268 total population forecast for reuse of the site by 2015. The FORA Reuse Plan includes substantially fewer resident students than AMBAG’s forecast, but more non-student population. AMBAG’s 44,268 person forecast *included* 20,000 resident students on the site by 2015 [AMBAG, 1994 *Population and Employment Forecast*, May, 1994, Table 12 Tract 141 and page 38.]

The DEIR should be revised throughout to correct errors based on misunderstanding of AMBAG’s current adopted 2015 population and employment projections contained in the above reference. For example, the DEIR statement that AMBAG’s population forecast for the site in 2015 is 66,612 plus 20,000 students, i.e. 86,612 persons, when it was 44,268 persons. The table “AMBAG Employment Data & Forecasts by County: 1980-2015” below summarizes the adopted AMBAG employment data and forecasts from that report.

6. [4-25, ¶ 4]. Please delete the entire paragraph beginning with “A balance between the number of jobs and housing units”, as inaccurate and misleading. The ratio of jobs to housing available in a specific area will not necessarily reduce any commute distances, automobile-related emissions or traffic congestion unless a mechanism is required to ensure that persons employed in the area also live there. Since neither the Reuse Plan nor the mitigations propose such a mechanism, adding jobs or housing in any ratio generally will generate trips, emissions and congestion, as documented by the DEIR.

4.4 Public Service Utilities and Water Supply

7. [4-42] To minimize unnecessary water usage, the exclusive use of native (or other drought tolerant) plant species for all outdoor landscaping (except for golf courses) should be considered. FORA should strongly consider adding, as a mitigation measure under Impact #2 (Need for Local Water Supplies), a statement that irrigated landscaping, in both public and private open spaces, yards, median strips, etc., will be minimized. The amount of water that would be saved if such measures were implemented should be estimated and included in the text of the Reuse Plan and its DEIR. The annual water usage of both existing and proposed golf courses on the former Fort Ord should be calculated and included as well.

4.7 Traffic & Circulation:

8. [4-68, ¶ 4] Please revise to read: "Land use forecasts for the area outside Fort Ord were based on the tract level forecasts of population adopted by AMBAG in May, 1994." The report should note that forecasts for traffic analysis zones were prepared by the FORA consultants. The zones used in the MCTAM model are not the same as used by AMBAG in its current census-based travel model. The socioeconomic inputs for each on-site zone should have been reported, since otherwise there is no way of determining whether the traffic volumes reported are in fact based on the proposed plan. The socioeconomic forecasts for off-site zones should also be reported, without which AMBAG cannot determine whether reported cumulative 2015 traffic volumes reported are based on forecasts adopted by AMBAG. 10
9. [4-72, ¶ 7] The DEIR omits mentioning that the baseline existing volumes and conditions (levels of service) reported in reported in Table 4.7-3 and Appendix B-1 do not represent actual counts of traffic volumes. Revise the text to read: "The existing (1993/94) daily volumes were not counted for this DEIR. Instead, base condition traffic volumes estimated by the MCTAM model for the year 1990 were used, adjusted where count or other data were available to 1993/94. These volumes, having been estimated by the model, are consistent with the volumes forecast by the model at the same locations, but do not necessarily provide accurate measures of average daily traffic or Level of Service at the locations for 1993/94 baseline conditions". 11
- "Existing Conditions" reported in the DEIR appear to be a mix of MCTAM model assignments, averages of different counts, or interpolations of counts. Without traffic count data for specific locations, existing conditions cannot be said to have been adequately documented as required by CEQA. Actual traffic counts for the locations collected during the 1990-1993 period at the locations cited in the DEIR are shown in the attached table, "Traffic count discrepancies-- 1990 Conditions for Fort Ord Region". As shown in that table, actual traffic counts at these locations are as much as 60 percent higher and 18 percent lower than those shown in Table 4.7-3 and Appendix B-1. 12
10. [4-73, ¶ 2, and 4-79 Table 4.7-3] Correct the reference to Level of Service in Table 4.7-2 since that table does not contain LOS. 13
11. [4-77, ¶ 4] Revise to read "...projected by AMBAG, 1994...". A reference to the current adopted AMBAG population and employment forecast of May, 1994 is missing from the bibliography. 14
12. [4-78 ¶ 3]. LOS results are not shown for all key off site roadways- for example: Route 101 was omitted. Please explain why the results were omitted for this roadway, or include those results in Table 4.7-3. 15
13. [4-78 ¶ 3]. LOS results are reported in Appendix B, not C. 16

- 14a. [4-78 Results of Traffic Modelling.]. Are the DEIR modal split assumptions used for the traffic forecasts documented, and if so where? See related comment # 39, below. 17
- 14b. [4-78 Results of Traffic Modelling.]. The procedures by which the socioeconomic forecasts, supplied by AMBAG to the consultants, were coded to the DEIR forecast model travel zones should be documented, since the DEIR model is not the current version of the AMBAG travel demand forecast model, and the travel zones used are not compatible with the current version. For this reason, detailed documentation of the process by which AMBAG zonal forecasts were converted to the zonal base and forecast values is essential to determine consistency. Without this documentation, AMBAG cannot determine whether the traffic forecasts used for this DEIR are consistent with AMBAG traffic forecasts for the same roadways, under various alternatives and years. 18
15. [4-79 Table 4.7-3]. Route 101 is correctly identified [4-71] as "a major regional roadway that is most significant for the former Fort Ord." However, volumes and LOS are missing from the DEIR for this roadway. Include AADT and LOS calculations on Route 101 north of 156 and south of Sanborn Road, for base and alternative future year scenarios in Table 4.7-3. 19
16. [4-79 Table 4.7-3]. Please explain how, without any capacity improvements north of the site, and with traffic generated by base reuse, the forecast AADT on Route 156 East of Castroville nevertheless decreases?[Financially constrained scenario compared with POM Use Only in 2015, Table 4.7-3]. 20
17. [4-81 Table 4.7-4]. On-site roadway volumes and LOS for the "POM only" scenario are missing and should be included in Table 4.7-4. Without these volumes and LOS calculations, the reader cannot assess the validity of the report's assumed redistribution of traffic which may result from capacity improvements planned to on-site and off-site roadways in the "Financially Constrained" or "Optimistic" scenarios. Without documentation of those redistributions in the DEIR, some traffic volumes and LOS results reported in the previous Table 4.7-4 cannot be explained and appear incorrect. 21
18. [4-82 ¶ 2]. The definition of significance for traffic impacts is inadequate, since no criteria are provided. What is the meaning of "substantial" and why is the change to LOS E or F qualified by the word "particularly". Revise this definition to match current adopted Monterey County Congestion Management Plan (CMP) language, or language contained in the current Monterey County General Plan, whichever is more stringent. 22
19. [4-82 ¶ 3]. Revise to read "...reduced circulation, access or safety for persons travelling by transit, bicycle or on foot." 23
20. [4-82 ¶ 4]. There is a typo error in this paragraph. 24

21. [4-82 ¶ 7]. Revise to read "transportation impacts of full buildout would be worse than those projected for the year 2015." 25
22. [4-82 ¶ 8]. Revise to delete the words "ultimate" and "existing" and "at the regional level" from the following statement: "the ultimate basis for existing impact significance at the regional level must remain the Constrained Financing Scenario," or justify their use in this statement. If, as this statement clearly reveals, the Reuse Plan traffic impacts can only be mitigated under the Constrained Financing Scenario, this is the only scenario of interest under CEQA. The Optimistic Financing Scenario only misleads the reader from the legal purposes of this DEIR. Revise the DEIR throughout to clearly identify only those mitigations and resulting impacts, and the residual unavoidable impacts, after all feasible mitigations proposed in the Constrained Financial Scenario. 26
23. [4-84 ¶ 2]. Ineffective mitigation, since Program A-1.1 does not ensure that the funding mechanism will be provided in time (concurrently with) the impact to be mitigated. The DEIR should be revised to recommend a mitigation requiring that the funding mechanism for traffic mitigations be adopted or otherwise provided by the jurisdictions prior to the jurisdictions having approved development which could result in the traffic impact to be mitigated. A concurrency requirement is missing from this DEIR's mitigations. Concurrency requirements should be added to all the DEIR's proposed traffic mitigations, to ensure that any traffic mitigations proposed are funded or implemented before which traffic-generating reuse developments or mitigation measures themselves are approved by FORA or the underlying jurisdictions. 27
24. [4-86 Mitigation to amend Streets and Roads Policy A-1.2]. Ineffective mitigation. FORA has no transportation planning or programming authority for "financial contributions to off-site transportation improvements." Programming such improvements in Monterey County is a TAMC responsibility, and the DEIR should be revised to so state. 28
25. [4-87 Program C-1.4]. Revise to refer to Appendix B. Ineffective mitigation. The phasing program referred to is not sufficiently specific to ensure concurrency between the roadway network improvements and the land use development approvals contained in the plan. Revise this program to add a concurrency requirement to ensure that roadways are implemented before traffic-generating Reuse developments or mitigation measures themselves are approved by FORA or the underlying jurisdictions. 29
26. [4-90 Program B-1.1.1]. Ineffective mitigation. Revise to require the adoption by the jurisdiction of a bike route plan, prior to the construction of additional roadway capacity on the site. Further revise to require that all upgrades or improvements to existing roadways or construction of new roadway capacity on the site be accompanied by Type II lanes or paths if shown on the Bike Route Plan adopted. Also, revise to add a requirement that bike parking and ancillary facilities necessary to support an anticipated 3 percent of all work or school trips to on site facilities by bicycle. Finally, revise to add a requirement that all new or upgraded traffic signals on the site contain bicycle sensitive detectors on approaches with actuated phases. 30

4.10 Biological Resources:

31

27. The Draft FORA Reuse Plan should better incorporate the principles of the emerging field of Conservation Biology by making stronger provisions for the permanent linkage of natural habitat areas on the former Fort Ord, and surrounding areas, through protected habitat corridors of sufficient width and vegetative cover. To promote the long-term viability of native wildlife populations, effective linkages/corridors between habitat areas should be maximized. According to biogeographical theory, "patches" of natural habitat that are not linked to other habitat areas become isolated, like islands, and this isolation eventually leads to high rates of localized extinctions, particularly in smaller habitat areas.

While it is noted that the Recreation/Open Space Land Use Policies and Programs section of the Land Use Element (Policy B-1), and also portions of the Conservation Element, call for linkage of open space areas, these policy statements are too vague and general to ensure that suitable habitat corridors will be established and protected over the long-term.

Specifically, the Reuse Plan and its DEIR should show a habitat corridor connection between polygons 7b/1b and 1e (and 1d?), of sufficient width and vegetative cover (as determined by a trained conservation biologist), which would traverse the proposed business park area in polygon 1a. Such a corridor would provide an important link between the riparian habitat of the Salinas River and the grassland, oak woodland and chaparral areas of polygons 1b and 7b. Where there are roadway crossings across corridor strips, habitat linkages can be maintained by ensuring that there are no barriers to wildlife movement (aside from the road itself, such as fences. Along busy roads, passageways for animal movement may be needed, such as small tunnels (e.g. 3-ft. diameter) built under the roadways.

Similarly, there should also be a protected habitat corridor linkage shown across polygon 7a, to allow animal movement between the Salinas River riparian corridor and the Habitat Management Areas of polygons 9a and/or 11a. There should also be a similar type of habitat connection shown between polygons 7b, 5c and 5b, across Reservation Road. A protected habitat corridor linkage should also be established between the "Frog Pond" in Del Rey Oaks (polygon 31a) and the BLM Habitat Management Area (polygon 25) through the proposed "Visitor Serving" area of polygon 29a.

5.2 Growth Inducing Impacts:

28. [5-11, Table 5.2-1] AMBAG's May, 1994 2015 projections are reported incorrectly. Revise from 66,612 to 44,268 population. See also AMBAG comments on the Reuse Plan for additional corrections to AMBAG population and employment estimates cited in the DEIR.

32

29. [5-11, ¶ 2-3] These paragraphs should be revised, as they assume AMBAG forecasts for the Monterey Peninsula include those for Census Tract 141 (Fort Ord site) plus the City and sphere of Marina and portions of unincorporated Monterey County. AMBAG's official adopted forecast for the "Monterey Peninsula" as defined in the May, 1994 AMBAG report, show 847 new persons a year between 2000 and 2015, not the 3,300 stated in the report. This increase implies a compound annual population growth rate of 0.9 percent, not the 2.61 percent stated in the DEIR. 33
- 30a. [5-12, ¶ 2] Revise to read "Roughly, this represents 88 percent of the population growth forecast by AMBAG for the former Fort Ord in 2015, in the May, 1994 forecasts. That forecast for 44,268 persons, including 20,000 students, was made without consideration of water availability for the forecast years. AMBAG will adopt revisions to that forecast by 1997. The revisions, as directed by the AMBAG Board, will specifically reflect the availability of water." 34
- 30b. [5-13, ¶ 1] Since, as noted in the DEIR, the AMBAG forecasts included twice as many resident students on the Fort Ord site as are projected in the Reuse Plan (20,000 as opposed to 10,000) please explain or revise the statement: "CSUMB and UCMBEST facilities are expected to draw... an increment of growth beyond that included in the regional projections prepared by AMBAG." 35
- [5-13, ¶ 3] Since, as stated in the DEIR, it "...is not feasible to present a detailed analysis of the environmental effects associated with growth beyond 2015", the DEIR should state why FORA should adopt Plan for uses beyond twenty years in the future --the date for which the impacts can be determined. The DEIR should also state why a mitigation measure is not feasible which would place a limit on Reuse development, consisting of the amount expected by the year 2015. 36
32. [5-13, ¶ 4-5] Delete these paragraphs, as they only contain unsupported opinion regarding FORA Board intentions. 37
33. [5-2, Table 5.1-1]. Salinas, a FORA Board member, was omitted from this table. Salinas is the largest and one of the fastest growing cities in the vicinity of Fort Ord. Its cumulative growth should also have been reported in the table. 38
- 34a. [5-3, ¶ 1]. Correct per comment #30a. for [5-12, ¶ 2]. 39
- 34b. [5-3, ¶ 2]. Correct per comment #30a. for [5-12, ¶ 2]. 40
35. [5-10, ¶ 6]. The statements regarding cumulative impact beyond 2015 are confusing and misleading. Revise to read: "Full buildout of the Draft Fort Ord Reuse Plan would occur by 2055, but small area regional employment and population forecasts cannot and have not been adopted by the metropolitan planning organization (AMBAG) so far in the future. As a result, cumulative impacts of the project have not been assessed beyond 2015, the last year for which current official population forecasts are available." 41

36. [5-12, ¶ 1]. The idea that previous levels of economic activity under military use would be recovered only by creating the same number of jobs as previously existed, measured by number of military personnel and civilian military employees is misleading and should be deleted. Given the lower economic multiplier effect of military personnel to the local economy, fewer civilian jobs than the prior number are sufficient to recover the former level of economic activity. 42

6.0 Alternatives:

37. [6-1]. Add an additional alternative as described in comment #1, above. 43
38. [6-19 Traffic and Circulation]. Here and elsewhere in the report, partial and incomplete references are made to estimates of daily vehicle and person trips generated under each alternative. Add a single DEIR table showing these estimated trip amounts, and their source, by year (1993/4 and 2015) for each alternative, to enable the reader to compare the alternatives considered. 44
39. [6-19 Traffic and Circulation]. Here and elsewhere in the report, partial references are made to the number of person trips and vehicle trips generated. The ratio of these amounts reported varies around 1.41-1.42. This "average vehicle occupancy" is higher than the comparable 1.34 value in the two County region for the System II travel model. The AMBAG two County regional traffic model version – with which the MCTAM model should be consistent – yields an average vehicle occupancy for all trip purposes of 1.34, which is six percent lower. If the regional average occupancy were used, the estimates of vehicle trips used in this report would all be 6 percent higher, affecting all the LOS calculations and findings of impacts in the DEIR. Please either explain why FORA Reuse plan person trips use less vehicles than the region as a whole, or revised to be consistent with regional forecasts. (Source: AMBAG, *Final documentation for the Monterey/Santa Cruz Regional Model*, plus that report's *Technical Appendix*, prepared by JHK Associates, July 1993.) 45
40. [7-4, Table 7.4] Revise AMBAG definition from "Associated..." to "Association of..." 46

AMBAG

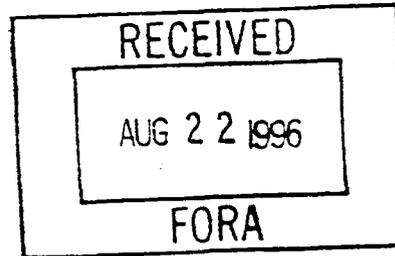
ASSOCIATION OF MONTEREY BAY AREA GOVERNMENTS

) 883-3750 FAX (408) 883-3755

Office Location: 445 Reservation Road, Suite G, Marina
P.O. Box 809, Marina, CA 93933-0809

August 20, 1996

Les White
Executive Director
Attention: Ann Hebenstreit
Fort Ord Reuse Authority
100 12th St. Bldg. 2880
Marina, CA 93933



RE: MCH #079609 - *Draft Fort Ord Reuse Plan*

Dear Mr. White:

Thank you for providing AMBAG the opportunity to comment on the *Draft Fort Ord Reuse Plan*. Our comments, which are attached to this cover letter are hereby transmitted separately from the AMBAG comments on the DEIR for this Plan. All page or section references to the Draft Plan are shown in brackets: [].

Thank you again for the opportunity to comment on the Fort Ord Draft Reuse Plan.

Sincerely,

A handwritten signature in black ink, appearing to read "Nicolas Papadakis".

Nicolas Papadakis
Executive Director

cc:

Bob Verkade, U.S. Army Corps of Engineers
Bob O'Laughlin, Federal Highways Administration
Bob Hom, Federal Transit Administration
Ken Nelson, Caltrans District 5, Attn: G.K. Laumer
Doug Quetin, Monterey Bay Unified Air Pollution Control District
Gerald Gromko, Transportation Agency for Monterey County
Linda Wilshusen, Santa Cruz County Regional Transportation Commission
Max Bridges, Council of San Benito County Governments
Frank Lichtanski, Monterey Salinas Transit
Scott Galloway, Santa Cruz Metropolitan Transit District
Brad Hagemann, Central Coast RWQCB
Tami Grove, California Coastal Commission - Central Coast District
Dr. Maggie Fusari, University of California Natural Reserve System
Steve Addington, Bureau of Land Management

Comments on the Draft Reuse Plan

1. To minimize unnecessary water usage, the exclusive use of native (or other drought tolerant) plant species for all outdoor landscaping (except for golf courses) should be considered. FORA should strongly consider adding a policy that irrigated landscaping, in both public and private open spaces, yards, median strips, etc., will be minimized. The amount of water that would be saved if such measures were implemented should be estimated and included in the text of the Reuse Plan and its DEIR. The annual water usage of both existing and proposed golf courses on the former Fort Ord should be calculated and included as well.
2. [Volume 1, Pages 2-11] Table and text references to 1995 California Department of Finance (DOF) population estimates were preliminary and should be revised to match final DOF figures released on May 2, 1996. For example, Monterey County final 1995 DOF population is now 361,400, not 370,996. Also, revise any growth rates using these estimates throughout. 2
3. [Section 2.2] Revise the "sources" cited for all Tables in this section. If Sedway, Kotin, Mouchly Group is only cited when consultants actually provided the data or forecasts shown, the reader could better identify the actual source of the data presented. Please cite specific sources, e.g. *1994 Regional Population & Employment Forecast*, AMBAG, May, 1994 3
4. [All Section 2] Revise all references to AMBAG "three county region" forecasts to "two county region (Monterey and Santa Cruz Counties)" forecasts. 4
5. [2-12 and elsewhere in Section 2.2] Revise all table and text references to AMBAG forecasts of "jobs for the region"; "regional employment" etc. to consistently use AMBAG's total employment forecasts as adopted in May, 1994 by AMBAG. The Plan sometimes cites AMBAG total employment figures, sometimes regional employment figures. The latter excludes out-commuters and work-at-homes. Calculated County shares and growth rates using these totals should also be revised throughout. By omitting out-commuters and work-at-homes, the Plan significantly understates total employment. For example, the "268,900 jobs for the region in 1995" should have been 310,700. (AMBAG, *1994 Regional Population and Employment Forecast*, Table 8, May 11, 1994). That table presents adopted AMBAG data and forecasts, some of which were not correctly cited in the Plan. Please revise the plan text and tables accordingly, using the figures in this table. 5
6. [2-15 ¶ 2] The statement that the AMBAG forecasts for population growth in Monterey County "...does not include CSUMB students" should be revised to: "...does include 20,000 resident CSUMB students by 2015". (See page 22 of the May, 1994 AMBAG forecasts cited above). 6

7. [2-15 ¶ 2] Delete the rest of this paragraph after the sentence ending with "...students". Final Department of Finance 1995 estimates (of May, 1996) shows Monterey County population at 361,400 -- almost identical to AMBAG's adopted forecast amount of 361,448 for that year. Why did the plan's authors "assume the relative accuracy of the State data"? 7
8. [2-15 ¶ 3] This paragraph incorrectly states that "AMBAG anticipates strong growth on the Peninsula". We suggest that this entire paragraph be revised, since AMBAG forecasts for the Monterey Peninsula exclude growth on Census Tract 141 (Fort Ord site); the City and sphere of Marina and portions of unincorporated Monterey County. Please revise references to " Monterey Peninsula" to be consistent throughout with AMBAG's definition of the Monterey Peninsula area. The annual population growth rate for AMBAG's definition of the Peninsula is 0.9 percent, not the 2.61 percent stated in the Plan. We also suggest that the plan text note that AMBAG's adopted population forecasts for the County *include growth which would not occur* without the impacts of Fort Ord Reuse. (See Table 10, page 22 of the May, 1994 AMBAG forecasts). 8
9. [2-16 ¶3; 2.17 to 2.2.5] As noted above, " Monterey Peninsula" should be revised to be consistent with AMBAG's definition of the Monterey Peninsula area. 9
10. [2-16 ¶3; 2.17 to 2.2.5] Please cite the source of these household forecasts, and indicate they are not official forecasts adopted by AMBAG. AMBAG's last adopted forecast of population in households was the *Regional Housing Needs Plan* of June 13, 1990. That household forecast is no longer current, since it extended only to 1996. 10
11. [2.17 Section 2.2.5] Please revise entire section per comment # 4. All quoted AMBAG two-county regional total employment figures and growth rates, as well as Monterey County employment figures and growth rates, should be revised to use a consistent total employment basis, i.e. including out-commuters and work-at-homes. Detailed comments on this section include: 11
- 11a. [2.17] The report should identify the source for the statement that "...current total employment is estimated at about 147,000 in the County". The text should note that this estimate differs substantially from the adopted AMBAG 1995 estimate of 155,342. (Excluding out-commuters and work-at-homes. See enclosed table "AMBAG employment data & forecasts by County, 1980-2015".). 12
- 11b. [2.17] The report should identify the source for the statement that "This reflects a net loss of nearly 13,000 jobs during the 1990-1995 period." The text should note that this estimate is more than double the AMBAG estimate of 5.458 net loss of jobs during this period. (Both exclude out-commuters and work-at-homes. From adopted AMBAG data 13

and forecasts for 1990-95. See enclosed table "AMBAG employment data & forecasts by County, 1980-2015".)

11c. [2.18 ¶ 2] Please revise paragraph beginning with "Between 1995 and 2015...", and included Table 2.2-5, since both text and table are incorrect and misleading, as well as in direct conflict with information just presented in the previous paragraph. (1990-2015 job loss was just cited as 13,000, and is here cited as 20-21,000. (See the enclosed table "AMBAG employment data & forecasts by County, 1980-2015".)

11d. [2.18] Please delete or revise the last paragraph for the following reasons:

1. The Monterey Peninsula is defined inconsistently with the adopted AMBAG definition;
2. "County employment growth" is too low, since it incorrectly excludes growth in the out-commute and home jobs of County residents;
3. The "potential capture rates" as a result, are not correct; and
4. The implication that Reuse would "capture" employment already assured for the region in AMBAG growth forecasts is incorrect and misleading. AMBAG forecasts explicitly state that the reuse of Fort Ord would "increase" employment in the County, compared to employment without Fort Ord reuse. AMBAG forecasts a lower employment growth without Fort Ord reuse. (Source: *Regional Population & Employment Forecast*, AMBAG, May, 1994, Table 1, p. 2, and text p. 2-3).

12. [Section 3, especially 3.1.1] In order to promote alternative modes of transportation, and thus minimize traffic impacts, the Fort Ord Reuse Plan should not only mention the design principles of AMBAG's *Livable Communities Initiative for the Monterey Bay Region* [4-27], but should also incorporate these five principles as part of the Reuse Plan. These principles, as recommended by the AMBAG Board of Directors on June 14, 1995, are:

1. Promote mixed, complementary land uses;
2. Promote transit supportive density and zoning for new development where scheduled transit service exists and transit funds are available to support that density and zoning in the future;
3. Provide pedestrian/bike circulation and access;
4. Provide transit access;
5. Promote pedestrian friendly design.

The AMBAG *Livable Communities Initiative*, along with its implementation document entitled "*Creating Transportation Choices Through Zoning*" were endorsed by the

AMBAG Board for distribution to agencies, cities and counties throughout the region. 16
The AMBAG Board recommended that the principles and practices contained in these documents should be considered for inclusion into all plans to be adopted such as the Fort Ord Reuse Plan.

13. The Draft FORA Reuse Plan should better incorporate the principles of the emerging field 17
of Conservation Biology by making stronger provisions for the permanent linkage of natural habitat areas on the former Fort Ord, and surrounding areas, through protected habitat corridors of sufficient width and vegetative cover. To promote the long-term viability of native wildlife populations, effective linkages/corridors between habitat areas should be maximized. According to biogeographical theory, "patches" of natural habitat that are not linked to other habitat areas become isolated, like islands, and this isolation eventually leads to high rates of localized extinctions, particularly in smaller habitat areas.

While it is noted that the Recreation/Open Space Land Use Policies and Programs section of the Land Use Element (Policy B-1), and also portions of the Conservation Element, call for linkage of open space areas, these policy statements are too vague and general to ensure that suitable habitat corridors will be established and protected over the long-term.

Specifically, the Reuse Plan and its DEIR should show a habitat corridor connection between polygons 7b/1b and 1e (and 1d?), of sufficient width and vegetative cover (as determined by a trained conservation biologist), which would traverse the proposed business park area in polygon 1a. Such a corridor would provide an important link between the riparian habitat of the Salinas River and the grassland, oak woodland and chaparral areas of polygons 1b and 7b. Where there are roadway crossings across corridor strips, habitat linkages can be maintained by ensuring that there are no barriers to wildlife movement (aside from the road itself, such as fences. Along busy roads, passageways for animal movement may be needed, such as small tunnels (e.g. 3-ft. diameter) built under the roadways.

Similarly, there should also be a protected habitat corridor linkage shown across polygon 7a, to allow animal movement between the Salinas River riparian corridor and the Habitat Management Areas of polygons 9a and/or 11a. There should also be a similar type of habitat connection shown between polygons 7b, 5c and 5b, across Reservation Road. A protected habitat corridor linkage should also be established between the "Frog Pond" in Del Rey Oaks (polygon 31a) and the BLM Habitat Management Area (polygon 25) through the proposed "Visitor Serving" area of polygon 29a.

14. [Volume 2, Section 4, p. 4-113] The plan's goals and objectives for bicycle travel are inadequate, since they do not require jurisdictions to provide bike facilities concurrently with redevelopment, nor in accordance with an identified functional bike route network for the site. The plan's bike objectives are expressed in the form: "Provide a bicycle system that supports the needs of Fort Ord..." [Objective B, p. 4-116]. This is fine, but the nature, location and amount of bicycle "need" is never defined, particularly as a concurrency requirement. "Need" could be defined by adding the phrase "with a goal of serving at least ___ percent of the total person trips generated by planned uses at the time of redevelopment approval" 18
15. [4-112] Revise Transit Policy C-1 to consider inclusion of the AMBAG Livable Community Initiative Policy # 2: "Promote transit supportive density and zoning for new development where scheduled transit service exists and transit funds are available to support that density and zoning in the future" 19
16. [4-112] Revise Transit Program C-1.1 to consider inclusion of the AMBAG Livable Community Initiative Policy # 4: "Provide transit access". To ensure that this policy is implemented by jurisdictions during development approval, add language to this program which requires that transit access is provided as needed by MST to service the site, concurrently with site development approval. 20
17. [4-116] The plan's Bicycle Policy B-1 states that "Each jurisdiction shall provide and maintain an attractive, safe and comprehensive bicycle system", but this system is not described or defined. Instead, the bicycle system is required to be "consistent with the Reuse Plan (Figure 4.2-6)" [4-116]. However, the referenced Figure 4.2-6 contains only a map of "Recreational Bicycle Trails" [4-115]. Please revise Figure 4.2-6 to describe a bicycle network with the appropriate class I and II bike routes for each functional class of roadway, without which the plan does not ensure that separate jurisdictions will provide a continuous, inter-connected bicycle route network for the former base. This is especially important due to the University, and since, as noted in the plan, some Fort Ord jurisdiction have been reluctant to provide bicycle facilities in the past. Finally, to ensure that bike facilities are in fact provided when needed, add the phrase "concurrently with development approval" to the end of Program B-1.2. 21

MINUTES

Fort Ord Reuse Authority (FORA)

August 22, 1996

7:00 PM

Oldemeyer Center, Seaside, CA

The meeting of the Fort Ord Reuse Authority was called to order by Chair Barlich on Thursday, August 22, 1996 at 7:00 PM in the Oldemeyer Center, Seaside, CA

1. Call to Order/Roll Call

Voting Members in attendance were: Supervisor Johnsen, 1st Vice Chair Supervisor Karas, Supervisor Perkins, MONTEREY COUNTY; Mayor Vocelka, Councilmember Perrine, MARINA; 2nd Vice Chair Mayor Jordan, Councilmember Mancini, SEASIDE; Vice Mayor Potter, MONTEREY; Mayor Pendergrass, SAND CITY; Mayor White, CARMEL; Mayor Koffman, PACIFIC GROVE; Chair Barlich, DEL REY OAKS

Ex-Officio Members in attendance were: Michael Houlemard, UNIVERSITY OF CALIFORNIA; Hank Hendrickson, CALIFORNIA STATE UNIVERSITY; COL Mettee-McCutchon, US ARMY; Ed Gould, MONTEREY PENINSULA COLLEGE; Dave Potter, TRANSPORTATION AGENCY OF MONTEREY COUNTY

Chair Barlich welcomed the public to the second special Board meeting to hear comments from the public on the Draft EIR on the reuse plan.

ITEM 2 - EXTENSION OF PUBLIC REVIEW PERIOD UNTIL OCT. 11, 1996

This is the second vote on this issue.

Boardmember Perkins moved to extend the public review until October 11, 1996, Mayor Koffman seconded.

Mayor Jordan stated there was no new information to justify this extension and their position is in opposition to this extension.

Boardmember Potter commented that the longer the public review process, the better the project so the extension is appropriate. It is a large document to digest and the more time to participate in the process the more time we can afford them the better.

Mayor White stated we need to show a little patience and collect as much public comment as we can. This will prevent us wasting time in court at the end of the period.

GO TO NEXT PAGE

The motion passed.

Mayor Koffman asked at the next FORA Board meeting that we put on the agenda discussion about one more public hearing.

ITEM 3 - OVERVIEW OF REUSE PLAN/EIR PROCESS

Michael Groves from EMC Planning Group gave a few comments on the plan. He addressed a number of questions that have arisen on this plan concerning water, transportation and the 2015 scenario. Mr. Groves also gave comments on the EIR and it's process.

ITEM 4 - RECEIVE PUBLIC COMMENTS ON DRAFT REUSE PLAN

169

Tom May, Carmel - concerned about no depiction of the accountability and responsibility of the MPWMD with respect to those precincts within the boundaries that lie within the City of Marina and the City of Seaside. There is a potential that there may have to be an economic subsidy by the rest of the peninsula, particularly the residents of Seaside and Marina for the other remaining portions of the Fort Ord land. He believes the charting of those responsibilities and accountabilities and the demands that are expected of the MPWMD should be more clearly laid out and delineated. Without that we do not have the best plan that the Cities deserve. They should have the opportunity to join as full partners in the eco-tourism of the Monterey Peninsula. He wants to see the water problem clearly stated because it is serious.

170

~~Stan~~^e Flavin from Monterey discussed the recent decision by a court of appeal. The name of the case is Stanislaus National Heritage project against the county of Stanislaus. This involved an EIR proposed some 29,000 acres of land development which included 6 golf courses, swimming and tennis facilities, hotel and executive conference center, winery, vineyards, research campus, town center, shops, offices and a total of 5,000 residential units. With respect to water, the final EIR in that case said the projects water supply will involve any one or a number of the following - off site groundwater, water purchase and exchanges, participation water conservation projects with other water districts in exchange for water utilization of wastewater effluent both on site and off site and also possible utilization of the aquaduct and the canal. We know our project will require a total of 18,262afy of which 6,600 is said to be available. The remaining 7932afy would have to be supplied by other sources. These are described as on site desal plant, on site recharged ponds, on site storage facilities, and the importation of water from other sources. The EIR of those developments are not described. In the Stanislaus case, the court said with respect to that description of the water requirements and how they would be supplied "the County in essence approved an EIR for a 25yr project when water for the project had not been assured beyond the first 5 years of the 15yr first phase of the project. The

169, 2, 170

170 County knew neither the source nor the water the project would use beyond the first 5yrs or what significant environmental effects might be expected in the as yet unknown water sources ultimately used. In our views County's approval of the project under these circumstances defeated a fundamental purpose of CEQA to inform the public and responsible officials of the environmental consequences of their decisions before they are made." I think this decision, while not yet final, is worthy of consideration by this Board.

171 Connie Wight, Carmel - this project requires 18,000afy. This draft does not specify where the 18000afy of water will come from, what projects can be built, or what the environmental consequences will be. The document ignores the scoping request for up to date seawater intrusion data. The DEIR provides no data but the opinion that seawater intrusion has slowed if not stabilized. Up to date data must be provided in a revised DEIR. DEIR also ignores the request for data on a safe yield for the base. The only information comes from the Army's DSIES, Dec. 1992. The DEIR also provides no data on current water use on base. It is understood that current use may be around 3000afy. Since safe yield is said to be 4700afy and current is around 3000afy, it would appear that FORA is being asked to certify this EIR and adopt this preferred project that needs 18000afy with as little as 1700afy. This defies common sense and CEQA. We have been told by State and local water agencies about the seawater intrusion crisis. The DEIR states "regional water supply shortage would not be solved by the proposed project."

Shirley Humann - Comments attached *see # 178*

Maya Holmes - Comments attached *see # 179*

Karen Morgan - Comments attached *see # 180*

Paul Tyksinski - Comments attached *see # 181*

172 Larry Hawkins, Seaside - many of the problems can be mitigated very simply. The residential densities are completely inadequate. They are twice as high as they should be and in some cases higher than exist on Fort Ord on those same housing areas. If each housing unit was replaced on a one for one basis, I could live with this plan, I cannot support the plan and the densities as it stands now. They are unrealistic. The densities of these units should be in the neighborhood of 9-10,000 sq.ft. lots, nothing smaller, otherwise we will end up with a San Jose.

173 Mary Ann Matthews - Carmel Valley - commented on the alternative section of the DEIR. The draft EIR admits that none of its alternatives to the preferred project complies with SB899 and therefore, at least in part, are not reasonable alternatives. The DEIR defeats one of the major purposes of CEQA which is to assure the selection and discussion of alternatives that foster informed decision

173 making. This is a fatal flaw in this document and it needs to be revised. Concerning the no-project alternative, it would create a city of 35000 people and needs 9400 acre ft. of water. She understands the rationale but the fact is the figures that have been put forward do not hold water. The University has stated its intent to build up to 25000 students so this no project alternative could be a city of 50,000 people. This is one example of this documents continued lack of clarity and misleading language. The Feb. 96 scoping comments asked for project alternative that would need only safe yield on site water. Such an alternative would greatly reduce the significant impacts of the project. 2
3

174 Becky T - This DEIR is fatally flawed. It cannot be fixed, it must be replaced. It fails to meet the basic characteristics of an adequate EIR that it be unbiased, that its major objective be a good faith effort for full disclosure. CEQA calls for EIR to address cumulative impacts and critically examine reasonable project alternatives that reduce or eliminate unmitigated impacts. This draft EIR fails to do this. Regarding cumulative impacts- this draft EIR achieves the end of misleading the public by using the exact opposite of piece-mealing, a technique that is specifically prohibited by CEQA. This program EIR is so general it does not accurately address cumulative impacts. The public cannot make an informed judgment about projects that can be identified and implemented later. That is in direct violation of the spirit of CEQA. This DEIR must be replaced with a document truly fulfills its guidelines under CEQA.

Larry Fenton - comments attached *see #182*

175 Peter Leonardick^b, Salinas - spoke about the possibility of a national cemetery on Fort Ord. | 1

Annette Cochran - comments attached *see #183*

Frank Eubanks, Jr. - comments attached *see #184*

Christine Bettancourt^e - comments attached *see #185*

Mark Christensen - comments attached *see #186*

Ira Lively - comments attached *see #187*

Bud Nunn - comments attached *see #188*

Louise Hale - comments attached *see #189*

176 Debra Mickleson - the DEIR states that the peak employment at Fort Ord was 17,700 military and 2700 civilians. The draft project objective of developing employment recovery leaves the reader to believe that 20,000 Fort Ord jobs

176 must be recovered. In fact, the DEIR unusual set of project alternatives are rejected in part because creating 26000 new jobs does not recover 20,000 jobs. No substantial evidence is provided to equate one military job to one non-military job, there is no basis to use employment recovery as an overriding consideration and any attempt to do so will be challenged. In addition, it is understood that the literal way in which this plan creates the 2000 future jobs is based on estimates used to design parking lots. In other words, if the project's 14mill sq.ft of office parks, 1800 hotel rooms, 6 additional golf courses were all built, theoretically, 42000 jobs would exist. It is cruel to allow the public to think that parking lot spaces in a plan are guaranteed jobs for the future. Mention is made in appendix B that the marketing program will target Silicon Valley. It should be mentioned that every base reuse effort targets Silicon Valley as does any new industrial park built anywhere in the US. This is standard developer language. A new DEIR must be prepared that accurately discusses the real impacts of losing military jobs. Data from a Rand study does discuss the fact that jobs are made available to the civilian population when military spouses leave the area when the other is transferred. The DEIR contains FORA 's proposed road alignments and improvements but in volume 2, page 495 - it's stated that in developing a roadway that does not exist or wiping the slate clean of existing roadways would be allowed sometime in the future. Once this EIR is certified and the project is improved, any jurisdiction can ignore the FORA plan and proceed to tear out existing roads and build new ones. At least one early re-user on Fort Ord today is receiving letters informing them that some day part of their land will be taken from them and in addition the re-user will be forced to pay for their share of new 4 lane road. It does not exist on the FORA plan. We deserve better.

Clark Beck - comments attached. *all # 190*

Grace Silva-Santella - comments attached *all # 191*

Sue McCloud - comments attached *all # 192*

Milos Radokovich - comments attached *all # 193*

177 Ron Chesshire - We are going to build whatever we will build in this county. He is in complete support of the reuse plan - taking 28000 acres, size of San Francisco, and putting 51,000 people in it. Anything that happens on the Monterey peninsula will impact any area. On the DEIR - how are you going to make a report responsible for all the cumulative past irresponsible actions of every jurisdiction that the Board represents. This county and infrastructure is overloaded, it makes it hard to live here. There is not consideration whatsoever about what that is doing. You bring one project up that will significantly impact the lives of the people in this community and give a lot of people hope for the future which was the objective of the federal government and you will make it

177 responsible for everything and you will financially burden the project so much to where you will kill it. As a peninsula resident I would like to see as much done to mitigate any environmental impacts. If we have to try and take care of everybody's concerns here and we don't move on we might as well put a big fence around Fort Ord and close it down.

ITEM 5 - ADJOURNMENT

The meeting adjourned at 8:35pm

ITEM 6 -NEXT MEETING DATE

Establish September 13, 1996 at 4:00pm as the date and time of the Authority's next regular meeting.

Minutes prepared by Susan Sullivan on September 3, 1996

Approved by: 
Les White

THIS DEIR MUST BE REVISED BECAUSE CEQA DEMANDS A STABLE
FINITE PROJECT DESCRIPTION WITH PROJECT OBJECTIVES OR
PROJECT GOALS THAT CAN BE ACHIEVED BY THE PROPOSED PROJECT.

STATE LAW, SENATE BILL 899, THAT CREATED THE 13 MEMBER
FORT ORD REUSE AUTHORITY BOARD AND CREATES THE MINIMUM
REQUIREMENTS FOR OUR LOCAL REUSE PLAN STATES FOUR GOALS:

QUOTING: 1-TO FACILITATE THE TRANSFER & REUSE OF FT ORD WITH ALL
PRACTICAL SPEED

2-TO MINIMIZE THE DISRUPTION CAUSED BY THE BASE'S CLOSURE ON
THE CIVILIAN ECONOMY.

3-TO PROVIDE FOR REUSE AND DEVELOPMENT IN WAYS THAT ENHANCE
THE ECONOMY AND QUALITY OF LIFE OF THE MONTEREY BAY COMMUNITY.

4-TO MAINTAIN AND PROTECT THE UNIQUE ENVIRONMENT AND RESOURCES
OF THE AREA.

THIS DRAFT EIR STATES PROJECT OBJECTIVES THAT ARE NOT CONSISTENT
WITH SB 899. IT STATES TWO GOALS:

Quoting; DEVELOPING AN ECONOMIC/EMPLOYMENT RECOVERY TO
COMPENSATE FOR BASE CLOSURE

2- TO ACCOMMODATE REGIONAL GROWTH.

RATHER IT APPEARS THAT THE TWO GOALS "ECONOMIC/EMPLOYMENT
RECOVERY AND ACCOMMODATING REGIONAL GROWTH" WERE CREATED TO
JUSTIFY THE 72,000 PERSON PROJECT AND WERE DONE IN ORDER THAT
THOSE WORDS COULD BE USED AS OVERRIDING CONSIDERATIONS IN THE
PROJECT APPROVAL PORTION OF THE CEQA PROCESS.

UPON ANOTHER REVIEW OF THE NOTICE OF PREPARATION SENT OUT IN
JANUARY 1996, IT SHOULD BE NOTED FOR THE ADMINISTRATIVE RECORD
THAT NEITHER OF THESE DEIR GOALS ARE MENTIONED.

IT WOULD ALSO APPEAR THAT THE 2 DEIR GOALS OVERSTEP THE
ENABLING LANGUAGE CONTAINED IN SB 899. THIS RENDERS THE DEIR
USELESS AND INADEQUATE.

Shirley Humann
PO Box 1565
Carmel, CA 93921

Maya Holmes
501 6th Ave. } I work in Pacific
Santa Cruz, CA } Grove and commute
10B. } 5 days a week into
the Monterey area.

Intro:

I would like to address the project's impacts on traffic and needed traffic improvements. The Draft EIR for this project is inadequate in this respect, because it does no analysis of the environmental impacts of on-site and off-site traffic improvements. Road improvements are part of this project and must be analyzed to comply with CEQA.

The public is largely unaware of the off-site traffic improvements that would be triggered by this 72,000-person project long before it is finally built out.

That is, when "only" 34,000 people reuse Ft. Ord, the following traffic improvements will be needed just to maintain the current level of service [Figure 4.7-2]: *(This is a pull-out map from the DEIR)*

Those improvements Off-Site are:

Hwy 156 must be four-laned

Hwy 183 must be four-laned

Hwy 1 must be six-laned *(by Seaside)*

Hwy 218 must be four-laned/Canyon del Rey Oaks Blvd. *(by Del Rey Oaks)*

Blanco Road must be four laned. But it is unclear in the Draft EIR whether that means the road will four-laned all the way out into the farmland.

Reservation Road is six-laned in Marina and beyond

Hwy 68 must be four-laned

On-Site:

Imjin Road must be four-laned

Second Avenue must be four-laned

North-South Road must be four-laned

Plus several road "extensions"

Most of these road improvements are off-site, which means someone else has to pay to make the road projects happen. Clarification is added in Volume 2, page 4-118 by one of the project objectives to, quote, "...not oversupply... infrastructure oriented to the use of the automobile. ..." end quote.

The DEIR does not explain the traffic impacts if no off-site improvements occur and for these reasons, the DEIR is inadequate.

3B.

The draft EIR contains no economic data regarding the base closure and its measured impacts on surrounding communities. The public has requested that FORA provide information for the fiscal years ending 1989 and 1995, using the City of Watsonville for perspective, City and County general budgets, sales tax, number of employed vs. unemployed, and school enrollment.

But the draft EIR, which claims the need for economic recovery as one of its main goals, provides no verifiable data.

The data provided by Marina and Seaside for a memo issued by the Pacific Grove City Manager on July 31, 1986 appears to state that Marina has lost about \$300,000 a year since the base closure, and Seaside has lost about \$200,000 a year.

This data should include information about tax subvention monies returned from the State to the cities based on their past and current military populations. Since the military comprised about 40% of each city population (Vol 2 pg 4-8, 4-11, 4-13) and since special legislation was passed to allow Marina and Seaside to continue to receive tax subvention monies as though military personnel still reside there, it's important to know that Marina receives about \$600,000 a year and Seaside receives about \$800,000 a year. On its face, this combined gain of \$1.2 million would seem to compensate for the combined 1/2 a million dollar loss.

Was this data omitted from the DEIR because a 1/2 million dollar loss, not to mention the compensation for this loss, does not justify asking the taxpayers to pay \$800 million for traffic improvements and perhaps \$300 million or more for water, in addition to losing the quality of life on this Peninsula?

This DEIR is inadequate and needs to be completely revised.

*Karen Morgan
1265 Surf Ave
Pacific Grove*

95. A major part of this project that has received little public attention and that is not adequately addressed in this draft EIR, is the need for 11,000 AF of wastewater treatment capacity [4-40].

Given the current size of the Regional Plant, operated by the MRWPCA and their permit to treat [4-36], the Ord project exceeds the the remaining capacity by 3,000 AF. This is not stated in the DEIR, but can be computed by hunting through the data.

As usual with this DEIR, the need for additional improvements would be "evaluated and necessary improvements would be implemented on a project-by-project basis." In other words, this problem will be identified and solved later [4-40].

This is not adequate under CEQA. The need for a subregional plant can be identified now and the environmental impacts of the project must be identified and mitigated now.

It should be noted that the MRWPCA plant will be upgraded to 33,000 AF capacity but that, given the current flow (22,000 AF), this Ord project would essentially take all that capacity. This would allow no increased flows from the existing 12-member agencies. This is not realistic and is not addressed in the DEIR.

In addition, the DEIR alludes that it is feasible to use the wastewater treatment facilities at East Garrison [4-36]. This is misleading. See Army DEIS, December 1992, Volume 1, page 4-45 and FEIS 1993, Volume 4, page 4-262

PAUL TYKSINSKI
18633 TARA DR
SARINAS CA 93905



Fort Ord Reuse Authority

DRAFT FORT ORD REUSE PLAN/EIR COMMENTS FORM

If you use this form to submit your comments, it is important that you include your name, address, and phone number below. You can use this form to submit your comments, or you can mail or fax your written comments directly to FORA. Your comments must be received no later than 5:00pm on Friday, August 30, 1996 unless otherwise announced.

Comments should be directed to:

Fort Ord Reuse Authority
100 12th Street Building 2880
Marina, CA 93933
Phone: (408) 883-3672 Fax: (408) 883-3675

PLEASE PRINT THE FOLLOWING INFORMATION:

Name: LAWRENCE B. FENTON
Address: 5100 COE AVE. #9
City: SEASIDE, CA Zip: 93955 Phone: (408) 899-5490

COMMENTS: (please also use the back of this sheet or attach additional sheets if needed). ^{MEETING STARTED}
^{12 MINUTES LATE}

IF MY NAME IS LARRY FENTON. I AM A
DISABLED AMERICAN VETERAN LIVING AT FT. ORD.
I CAN SAY FROM EXPERIENCE THAT HEALTH
CARE FOR VETERANS IS INADEQUATE, AND AFFORDABLE
HOUSING IS NOT AVAILABLE AS WELL.

LAST WINTER I VISITED THE VETERANS
CLINIC AND WAS TOLD AT THAT TIME THAT
I WOULD HAVE TO WAIT 2 MONTHS TO SEE
THE DOCTOR FOR MINOR SURGERY.

I HAD TO PERFORM THE OPERATION MYSELF
BECAUSE THERE WAS NO WAY THAT I WAS GOING
TO WAIT 2 MONTHS FOR THE NEXT AVAILABLE
APPOINTMENT, ESPECIALLY DUE TO THE POSSIBILITY OF
MY CONDITION WORSENING.

FORTUNATELY I BECAME FINE AFTERWARDS, BUT
WHAT ABOUT OLDER VETERANS, OR WORSE AILMENTS
THAT THEY MAY SUFFER FROM?

WAS IT THIS SAME FORA BOARD THAT
DECIDED THERE WAS NOT ENOUGH NEED FOR THE
PREVIOUS VETERANS HOSPITAL THAT WAS LOCATED HERE?

WHY DO STUDENTS GET PRIORITY CARE
AND HOUSING, BUT VETERANS DO NOT ON A
FORMER ARMY BASE,

THE MEDIAN PRICE CHARGED FOR RENT
IN A MOBILE HOME PARK IS APPROXIMATELY
\$400⁰⁰ PER MONTH FOR A SPACE IN THE
SURROUNDING AREAS BETWEEN MONTELET &
SAN FRANCISCO, BUT HERE AT FT. ORD I HAVE
TO PAY OVER \$800⁰⁰ PER MONTH WITH THE
RINC ORGANIZATION. THAT IS NOT AFFORDABLE
HOUSING. WHILE THE STUDENTS AT CSUMB ARE
GUARENTEED HOUSING WHILE GOING TO SCHOOL
THERE, VETERANS ARE GUARENTEED NOTHING.

I WOULD LIKE TO KNOW WHAT THE
FORA BOARD WILL DO TO ACCOMODATE VETERANS
INSTEAD OF WHAT THEY HAVE ALREADY DONE
TO DISMANTLE WHAT SUPPORT THAT USED TO
BE HERE. END OF STATEMENT. L.F.

Annette Cochran (sp?)

~~606~~. The DEIR project needs 18,000 AF of water. The DEIR makes the astounding assertion that "Because a number of reasonable, new water supply sources have been identified ... the increased demand for water [is] a less than significant impact at the project level." 1

The DEIR also states that "Cumulative development would increase the demand for water distribution services and would be mitigated by the capital improvements ~~and~~ policies and programs. The cumulative demand for these services would not be considered a significant impact."

One fatal flaw in this draft EIR is its use of 25 words to supply all the details needed to understand how 18,000 AF of water will be "imported," "recharged," "stored," or "desalinated." Full disclosure of project impacts are not disclosed.

Another flaw is that water projects, like traffic projects, are part of the proposed 2 project, not a "mitigation measure."

Another flaw is that "policies and programs" are not legally enforceable. Further, a 3 "policy" like the one in Volume 2, page 4-162, "The City [or County] shall ensure additional water to critically dry areas" is as unenforceable as it is silly. By definition, when over 2/3 of the land for urban use has no current water supply, basically all the land is "critically dry."

An added danger in this document is a policy that says "The City/County shall condition approval of development plans on verification of an assured long-term water supply for the projects."

This is very dangerous. It implies that developers already own the land when they 4 receive the conditional use permit. It means thousands of legal lots of record (cumulatively) will be created, but there may be no water supply to serve those legal lots of record.



Fort Ord Reuse Authority

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100 12th Street Building 2880
Marina, CA 93933
Phone: (408) 883-3672 Fax: (408) 883-3675

PLEASE PRINT THE FOLLOWING INFORMATION:

Name: FRANK C EUBANKS JR
Address: 1738 MENDOCINO ST
City: SEASIDE CA Zip: 92055 Phone: 949-211-119

COMMENTS: (please also use the back of this sheet or attach additional sheets if needed).

*Distribution of land and area responsibility
of the area of the sites of responsibility.
- must concern with fire hazard who is
responsible - when will distribution*



Fort Ord Reuse Authority

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100 12th Street Building 2880
Marina, CA 93933
Phone: (408) 883-3672 Fax: (408) 883-3675

PLEASE PRINT THE FOLLOWING INFORMATION:

Name: Christine Bettencourt
Address: Box 260
City: Big Sur Zip: 93920 Phone: 899-4479

COMMENTS: (please also use the back of this sheet or attach additional sheets if needed).

I live approx. 1 mi from Dump
I request a public hearing concerning
ROD Amendment due to it being a fundamental
change to the 1st. ROD
Re: Digging up landfill
& creating toxic dust
through the operations of
movement.

RACHEL'S HAZARDOUS WASTE NEWS #217

Providing news and resources to the Movement for Environmental Justice - January 23, 1991

Plastics—Part 2

WHY PLASTIC LANDFILL LINERS ALWAYS FAIL

In the landfill business, government and industry say plastic liners are going to save the day. For example, U.S. Environmental Protection Agency (EPA) and industry both argue that incinerator ash can be safely "disposed of" in a double-lined ash "monofill." A "monofill" is a landfill that contains only ash, no raw garbage. Like any other landfill, the basic design is a bathtub in the ground. The bottom of the bathtub is formed by a huge sheet of plastic. In an expensive landfill, you have two sheets of plastic separated by about two feet of sand and gravel—thus creating one bathtub inside another bathtub. Therefore, a double-lined ash monofill is a landfill (which is really just a polite word for a dump) in the form of a bathtub created by two plastic liners, containing incinerator ash and nothing else.

The theory behind the monofill is that ash contains only small amounts of aggressive organic chemicals that might eat a hole in the plastic liner, so the plastic liner will remain intact and protect us against the lead and cadmium and other toxic metals contained in the ash. (See *RHWN #92*.) As always, the key question is: what is the duration of the hazard and what is the duration of the protection provided by the plastic liner? (The "cap" or umbrella covering a landfill will also be made of the same plastic, so a landfill is really a "baggie" in the ground, containing toxins. What is the lifetime of this baggie? How long will it protect us?)

What is the duration and nature of the hazard from metals in incinerator ash? As we saw earlier (in *RHWN #92*) incinerator ash is rich in toxic metals. For example, it typically contains anywhere from 3000 parts per million (ppm) to 30,000 ppm of lead. U.S. Environmental Protection Agency Region 1 (Boston), and the Harvard University School of Public Health have recommended a cleanup action level of 1000 ppm for lead in soil—in other words, they recommended that remedial action, as would be needed at a Superfund site, should be undertaken wherever lead in soils exceeds 1000 ppm. In recommending the 1000 ppm action level, EPA and Harvard wrote, "While we believe a greater margin of safety would be achieved with an action level of 500 ppm, we think it necessary to set priorities for remedial activity." (What they meant was that there are so many places in urban America where there is 500 ppm lead in soil that EPA

would be overwhelmed with work if 500 ppm were set as the threshold for remedial action—so 1000 ppm is a more 'realistic' cleanup action level even though it's not as safe as the nation's children really need it to be.)

Given that EPA Region 1 and the Harvard School of Public Health have recommended that Superfund-type cleanup be initiated whenever soils contain more than 1000 parts per million (ppm) of lead, we know immediately that every ash monofill will have to be cleaned up at some time in the future because all incinerator ash contains more than 1000 ppm lead. (Ash also contains dangerous amounts of other toxic metals—cadmium, arsenic, chromium, and perhaps others, so lead is not the only reason why a cleanup might be needed.) Therefore, when we create ash monofills we know we are creating Superfund sites that our children will pay for—either in damage to their brains and nervous systems, or in enormous outlays of money—or both.

Because lead and cadmium and other metals never degrade into anything else, but remain toxic forever, the duration of the hazard is perpetual, everlasting, eternal. The danger will never go away.

The incineration industry, and its allies in government, argue that the plastic liners will protect us and our children forever. Unfortunately, this idea is based on a misunderstanding (or more likely an intentional misrepresentation) of what happens to plastics as they get older. Plastics are not inert; they do not stay the same as time passes. They change. They come apart spontaneously.

A recent book by Deborah Wallace, Ph.D., describes this process well. The book is about the dangers of plastics in fires, but in telling the story of "Why today's fires are so dangerous," (the answer is because burning plastics give off toxic gases that kill people who breathe them) Dr. Wallace included a section on the makeup of plastics at the molecular level, which helps us understand why all plastics eventually fall apart.

The building blocks of plastics are found in natural gas, coal, and wood, but the major source is oil. Oil (like coal and natural gas) is a mixture of molecules of different sizes and structures. To separate out the different molecules, crude oil is distilled in an oil refinery. The oil is boiled and smaller, lighter molecules are separated from the larger, heavier molecules. The heavier molecules are then "cracked" to break up the large, heavy molecules into smaller, lighter molecules.

The result of this distillation and cracking is organic chemicals, which is the name for chemicals containing carbon and other elements (chiefly hydrogen, oxygen, and nitrogen). These organic chemicals form the building blocks of pesticides, glues, and plastics. Other chemicals (such as chlorine and lead) are added to give the raw materials new characteristics (strength, stiffness, color, and so forth).

After the building blocks are manufactured, they are turned into plastic resin by a process called polymerization. A polymer is a large, organic, chain-like molecule made of repeated units of smaller molecules. Polymerization usually requires heating the raw materials in the presence of helper chemicals called catalysts, until the building blocks form long chains. Even with the catalysts, a great deal of heat is used in the polymerization process. "Because of this heat, the long chains, even during manufacture, may decompose slightly and have defect points along them," Dr. Wallace explains. The defect points are in the chemical bonds, which absorb the energy used in the manufacturing process. The law of conservation of energy states that the amount of energy in a system after the reaction is the same as the amount of energy before the reaction. The large amounts of energy (heat) thus must go somewhere; they go into the bonds between the atoms of the plastic and are stored there. But nature does not favor this gain of energy—nature favors low energy chemical bonds, and high energy bonds tend to release their energy by breaking spontaneously. These are defect points. Although polymer scientists have striven to reduce the number of defect points, they have not been able to completely eliminate them from synthetic polymers.

Dr. Wallace continues, "The physical and chemical defects that are produced by ordinary processes in the manufacture and use of plastics demonstrate the fragile and unstable character of these long chains of

molecules that are joined by high energy chemical bonds. When the resin is further processed to become the finished marketable product, additional defect points are created because the product is again heated and handled."

As time passes, plastics decompose—their molecules come apart spontaneously—beginning at the defect points. Polymer scientists refer to this decomposition as "aging." All plastics "age" and there is nothing that can be done about it. Within a few years (at most a few decades), all plastics degrade, come apart, and fail. They become brittle, lose their strength, crack, break into fragments. At that point, any protection the plastic may have afforded against the toxic dangers lurking in an ash monofill is gone. By that time, the people who created the ash monofill will have taken their profits and left town, but the deadly residues they leave behind—the ash—will remain to plague the community forever, poisoning the community's children with toxic lead and other metals.

The only affordable solution to this problem is a simple one: prevent the creation of incinerator ash.

*P.L. Ciniello and T. Goldberg, "Lead-Contaminated Soil Cleanup Draft Report" which appears as Appendix E in: Agency for Toxic Substances and Disease Registry, *The Nature and Extent of Lead Poisoning in Children in the United States: A Report to Congress* (Atlanta, GA: Agency for Toxic Substances and Disease Registry, Public Health Service, U.S. Department of Health and Human Services [1600 Clifton Rd. - Mail Stop E-33, Atlanta, GA 30333; phone (404) 639-0730], July, 1988). Free while supplies last.

*Deborah Wallace, *In the Mouth of the Dragon* (Garden City Park, NY: Avery Publishing Group [120 Old Broadway, Garden City Park, NY 11040; phone (516) 741-2155], 1990). \$17.95.

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Citizens Clearinghouse — CCRW
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RACHEL'S HAZARDOUS WASTE NEWS #109

From Rachel: Weekly news and resources for citizens fighting toxics -- December 26, 1988

THE CATCH-22S OF LANDFILL DESIGN

The waste hauling industry knows that all landfills will eventually leak because their own industry trade journals are now telling the story. Waste Age is the main magazine for the waste industry. The editors of Waste Age are not sympathetic to environmental groups. For example, it was in Waste Age's columns that you may have read,

"The NIMBY [not in my back yard] syndrome is a public health problem of the first order. It is a recurring mental illness that continues to infect the public.

"Organizations that intensify this illness are like the viruses and bacteria which have, over the centuries, caused epidemics such as the plague, typhoid fever, and polio.

"....It is time solid waste management professionals stopped wringing their hands and started a campaign to wipe out this disease." (Waste Age, Mar., 1988, pg. 197.)

Clearly Waste Age is no friend of the grass roots environmental movement. Yet it has been publishing articles that say what we've been saying all along: the security and safety of landfills is dependent upon the landfill cap, and the landfill cap is inevitably destroyed by natural forces.

Waste Age has run a series of articles over the past two years saying why landfills will inevitably leak, and suggesting that the only solution to the problem is perpetual maintenance of the closed landfill. Since humans have no experience maintaining anything in perpetuity, perpetual maintenance is an untested and unproven, and, one can only say, silly non-solution. If we took it seriously, perhaps we would develop a large army of landfill maintainers whose only job in life will be to maintain the toxic garbage left behind by their parents and their parents' parents and their parents' parents' parents and so on for generation after generation.

Despite the silly suggestion that perpetual maintenance of landfill caps is a way out of our present garbage problem, these articles contain much good information about why landfills leak.

Remember, a landfill is nothing more than a bathtub in the ground (perhaps, in the case of a double-lined landfill, one bathtub inside another). A bathtub will leak if its bottom develops a hole, or it can simply fill up with water (for example, rainfall) and leak over its sides. Either way, a landfill can contaminate the local environment. Therefore, a "cap" is placed over the landfill when the landfill is full. The "cap" is supposed to serve as an umbrella to keep rain out, to keep the bathtub from spilling over its sides.

Writing in Waste Age, Dr. David L. Johnson and Dr. Glenn R. Dudderar of the Michigan State University Department of Fisheries and Wildlife, have argued,

"There is evidence that the engineered integrity of a cap will not be maintained over the landfill's extended life." (This is somewhat fancy language for "All landfills will eventually leak.")

Johnson and Dudderar go on to say, "Regulations may require bonding for five to 20 years. Yet from a biological and geophysical point of view this time period is a totally inadequate maintenance requirement." (Translation: It may take nature more than 20 years to destroy a landfill cap, but nature has all the time in the world, so you'd better be prepared to maintain a landfill for the long haul--forever.)

Catch 22 #1: A landfill cap is intended to be impermeable--to keep water out. This means water is supposed to run off the surface. But this, in turn, invites soil erosion. "But in the runoff process, cap soil will be carried with the runoff, causing sheet and rill erosion and, ultimately, gullying of the cap." When you get gullies in the cap, it's all over.

Other physical forces working constantly to destroy a landfill cap are freeze-thaw and wet-dry cycles. Soil shrinkage during dry weather can cause cracks. Rain penetrates the cracks. In winter, rain freezes to ice and expands, widening the cracks. And so on, year in, year out, century after century. The cracks not only let in water, they also provide pathways for plant roots and for burrowing animals.

Catch 22 #2: To minimize soil erosion

and to minimize changes due to wet-dry cycles, you need to establish vegetation on the cap. However, plants maintain their physical stability, and they gather water and nutrients, through roots, which can penetrate a landfill cap, destroying the cap's integrity. Furthermore, plants provide cover (and food) for burrowing animals, which then burrow into the cap, destroying it.

A study of a solid radioactive waste landfill reveals that mice, shrews, and pocket gophers can move 10,688 pounds (5.3 tons) of soil to the surface per acre per year. "Similar activity would have a dramatic impact on landfill cap integrity," Johnson and Dudderar observe. Burrowing animals of concern include woodchucks, badgers, muskrats, moles, ground squirrels, chipmunks, gophers, prairie dogs and badgers. Clay presents little barrier to such animals; "synthetic liners, measured in mils [of thickness], are not likely to impede these same mammals," Johnson and Dudderar observe. Non-mammals are also a problem: crayfish, tortoises, mole salamanders, and "a variety of worms, insects and other invertebrates" can make holes in a landfill cap.

Earthworms alone can have a devastating impact on a landfill cap. Earthworms pass two to 15 tons of soil through their digestive tracts per acre per year. "The holes left as they move through the soil to feed increase water infiltration," Johnson and Dudderar comment. They give evidence that worm channels allowed plant roots to grow to a depth of nine feet in Nebraska clay soils.

In a section called "The fundamental dilemma," Johnson and Dudderar sum up: "At this point you may well say: 'If we

plant, we're encouraging plant and animal penetration of the clay cap. If we don't plant, we get erosion or freeze-thaw destruction of the cap.'

"Unfortunately, that is one of the fundamental dilemmas left us by the normal processes of change in the natural world, be they the progressive conversion of a grassy field to a forest or the utilization of cracks in concrete sidewalks by ants and dandelions.

"This same successional development process, so intensively studied in the ecological literature, will detrimentally affect long-term landfill integrity." So there you have it, right from the pages of Waste Age: the forces of nature, left to themselves, will destroy landfill caps, the key element intended to prevent landfills from leaking.

What hope is there? Perpetual care. A perfectly silly idea. What reasonable hope is there? None whatsoever. All landfills will eventually leak. Happy new year.

For further information, see: David I. Johnson, "Caps: The Long Haul," Waste Age March, 1986, pgs. 83-89; David I. Johnson, "Capping Future Costs," Waste Age August, 1986, pgs. 77-86; David I. Johnson and Glenn R. Dudderar, "Can Burrowing Animals Cause Groundwater Contamination?" Waste Age March, 1988, pgs. 108-111; see also David I. Johnson and Glenn R. Dudderar, "Designing and Maintaining Landfill Caps for the Long Haul," Journal of Resource Management and Technology, Vol. 16 (April, 1988), pgs. 34-40. Dr. Johnson [phone 517/353-1997] and Dr. Dudderar [phone 517/353-1990] are with Department of Fisheries and Wildlife, Michigan State University, East Lansing, MI 48824.

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Date # of pages 5

To Christine Bettevant From CCHW

Landfill liners may leak

By ELLIOT GOLDBERG
Staff Writer

The New Jersey Department of Environmental Protection contends that the type of dual plastic liners Gloucester County is planning for its landfill "eventually will leak," and the \$6 million-or-more question may be whether the county must install more expensive clay liners.

The county may be required to add a protective clay layer to its proposed landfill even if the South Harrison Township site that has been voided by a court order is selected again.

The Gloucester County Improvement Authority's construction specifications for the site call for installing a cheaper, plastic, dual liner system that the DEP found acceptable last year. Construction bids received by the GCLA call for the synthetic liners.

But DEP officials are requiring a "composite" primary liner with 18 inches of clay, plus plastic, for a similar new landfill in Cumberland County. And they say regulations may be enacted to require clay at all future landfills to prevent groundwater contamination.

The South Harrison site was tossed out by an appellate court panel two weeks ago, but it is still unclear whether Gloucester County's plans for plastic liners can be excluded from the new regulations with a "grandfather clause."

Even if the county freeholder board renominates the South Harrison

site to comply with the court's decision, the county may face a moral question of whether it wants to stick with a liner system the DEP now says is inferior.

"If there's something better than what we're doing out there, maybe the delay isn't so bad," said GCLA Chairman Joseph Clegg, referring to the halted work in South Harrison.

Adding clay could substantially increase both construction costs and dumping fees at the proposed landfill, Clegg conceded.

"But do you put a dollar value on the integrity of a landfill? I don't," he said after Thursday night's GCLA meeting.

However, Clegg and Freeholder Stephen B. Atkinson, who is in charge of solid waste, said they are not convinced that the plastic system is necessarily prone to failure.

Haydar Erdogen, a DEP landfill design engineer, said Thursday it will be "a management decision" as to whether the South Harrison site would come under old or new regulations if it were renominated.

"The regulation (requiring clay liner) is in draft form," Erdogen said, and will be subject to public comment before taking effect.

The DEP's turnaround on plastic is based partly on reported leaks at Cape May County's two-year-old landfill. But Erdogen said the DEP has evidence in "more than one case that plastic liners fail."

Erdogen said, however, that the DEP has not determined an exact cause for any of the leaks at the Cape May County site.

In a response document to a DEP public hearing about Cumberland County's site in Deerfield Township, the agency says it "has obtained new information concerning the performance of synthetic liners. Based on this information, the Department believes that synthetic liners eventually will leak."

While saying proof of the superiority of clay is "not conclusive," the DEP said such liners are now "preferred" because they contain no seams and have a "self-plugging characteristic" to stop contaminants from leaking through.

At the Cumberland County site, the DEP said, a final permit will require

an 18-inch layer of clay along with Hypalon, a type of plastic, for the primary liner. Such a liner would provide "a greater measure of security," the document says.

Like Cumberland, Gloucester County has designed its site with a 36-mil Hypalon liner as the primary liner. A secondary liner at South Harrison would be polyvinyl chloride.

Atkinson said a clay liner at South Harrison would increase total capital costs for the first phase of that project — preparation of 20 acres for landfilling — from an estimated \$9.8 million to \$16.2 million. Clegg said that estimate might even be too low.

"They have not proved to me that the Cape May landfill is a failure," Atkinson said, suggesting that a DEP requirement for compacted clay, based on that site's history, might be "irresponsible."

Some South Harrison residents are upset by the county planning staff's contention that the clay would be required only if the county were to choose another landfill site. Failure to disclose specifically that the clay

liner might be required at the current site "skewed" cost figures in favor of the existing location, they claim.

"They didn't even question figures that might be inaccurate," resident Robert Clark said about the freeholders. But Clark and other residents say that if the South Harrison site is selected again, the county has an obligation not to put in an inferior liner.

At Thursday's GCLA meeting, the residents continued to contend that the county has overestimated how much it already has spent toward developing the South Harrison site. Such estimates have been in the \$2 million to \$3 million range.

William Gauntt, chairman of the GCLA's finance committee, said the authority has spent about \$2.17 million from a bond issue for the site, not including a \$500,000 loan the authority accepted from the county last year. With the loan proceeds included, Gauntt said the total was about \$2.67 million.

However, the residents contended that the \$500,000 loan should be excluded, and suggested the GCLA padded its totals by claiming it had spent about \$1.92 million for land acquisition.

Authority Solicitor Eugene Chell admitted the county has paid out only about \$245,000 to buy property, but he and other GCLA officials said the county has had to put the rest of the \$1 million into a court-required escrow account for property it has condemned but not purchased.

Reprint from: Gloucester Times, Friday, February 21, 1986

FORT ORD CALIFORNIA

EPA ID# CA7210020676



EPA REGION 9
CONGRESSIONAL DIST. 16
Monterey County
2 miles north of Monterey

Site Description

The 29,440-acre Fort Ord site was established in 1917 by the U.S. Army as a maneuver area and field artillery target range. Presently, the base's primary mission is training of military personnel. Chemicals and hazardous wastes were disposed of at Fort Ord. Currently, hazardous wastes are stored at on-site facilities before they are transported and disposed of off site. There are several areas of contamination on site. One of these areas includes three inactive landfills that once were used to dispose of residential and commercial waste. The facility contained leaking hazardous waste tanks, containers of waste oil and various automotive chemicals, chemical storage areas, an oil-water separator, and fueling stations. Another area of on-site contamination is the 14th Engineers Motor Pool. Approximately 5,000 underground fuel tanks, drums of waste oil and other wastes, and sand pits in which waste oil, liquid wastes, and battery acid were disposed of at this area. Fuels were placed into unlined pits and subsequently percolated through the subsurface soil. The Army conducted a preliminary assessment of the site in 1983. Additional areas of contamination have been identified by the U.S. Army, including: the 519th Maintenance Complex; Open Detonation Area Range 36A; Main Garrison Sewage Treatment Plant; 1600 Area Motor Pool Complex; 3800 Area Motor Pool Complex; 3700 Area Motor Pool Complex; Old DEH Yard; AAFES Main Service Station; Old DRMO Facility; and AAFES Cleaners. The local population at Fort Ord (including both civilian and military personnel and their dependents) is approximately 30,000. Approximately 38,600 people obtain drinking water from wells within 3 miles of the site. The Salinas River alluvial basin, El Toro Creek, and Monterey Bay border the site.

Site Responsibility: This site is being addressed through Federal actions.

NPL LISTING HISTORY
Proposed Date: 07/14/89
Final Date: 02/22/90

Threats and Contaminants



On-site groundwater and soil are contaminated with heavy metals, fuel hydrocarbons, and volatile organic compounds (VOCs). Contaminants have been detected in groundwater samples collected from Fort Ord and Monterey County Water District water supply wells. On-site soils in the area of the Maintenance Facility, Engineers Motor Pool, the Cannibalization Area, which was used for stripping used equipment, and the Fire Drill Burn Pit areas have been contaminated with chemicals that have spilled onto the ground. As a result, on-site workers as well as employees of the Fort

Ord Army base could be exposed to site-related contaminants when coming into direct contact with these contaminated soils. Should site-related contaminants migrate off site through the soils or groundwater, the Salinas River, El Toro Creek, and Monterey Bay could be affected.

Cleanup Approach

This site is being addressed in four stages: immediate actions and three long-term remedial phases focusing on cleanup of the entire site, the Fritzsche Army Airfield practice fire pit, and the Fort Ord Landfill.

Response Action Status



Immediate Actions: The U.S. Army initiated an investigation into the nature and extent of groundwater contamination and the most effective methods to address it. Preliminary findings showed an additional area of contamination known as the Fritzsche Army Airfield practice fire pit. The Army installed a groundwater and soil treatment system that became operational in 1988. The contaminated groundwater is treated using carbon adsorption. A mixture of treated groundwater and necessary nutrients is sprayed on the contaminated soil adjacent to the groundwater treatment plant to facilitate the treatment of the soil.



Entire Site: In 1990, the Army began further investigations into the nature and extent of soil and groundwater contamination on and off site, as well as any ecological or health threats that may be present. The Army expects to complete this investigation in 1997.



Fritzsche Army Airfield Practice Fire Pit: An investigation into the nature and extent of contamination in the Fritzsche Army Airfield practice fire pit began in 1990. It is scheduled to be completed in 1993, after which the final cleanup remedy for this area will be selected.



Fort Ord Landfill: Groundwater and soil contamination originating from the landfill is the focus of an investigation started in 1990 by the U.S. Army. The study will result in recommended alternatives for cleaning up the affected areas. The study is expected to be completed in 1993.

Site Facts: Fort Ord is participating in the Installation Restoration Program, a specially funded program established by the Department of Defense (DoD) in 1978 to identify, investigate, and control the migration of hazardous contaminants at military and other DoD facilities. In 1990, Fort Ord signed an Interagency Agreement with the EPA and the State of California to address contamination on and off site.

Environmental Progress



The groundwater treatment system has greatly reduced the potential of exposure to contaminated groundwater while studies leading to the selection of final cleanup remedies are taking place at the Fort Ord site.

185-8

August 22, 1996

Comment to FORT Board:

Many speakers have challenged the legal adequacy of the DEIR and Plan. The political members of the Board need also to think about the political adequacy of the Renew Plan -- for political support of the surrounding communities is essential to the success of Seaside and Marina in their plans for readjustment and development. If it is not already clear that the Renew Plan/DIR before ^{you} is politically unacceptable, it soon will be. Staff and consultants have ~~provided~~ ^{not} ~~provided~~ ^{not} provided you with a politically acceptable document. The time has come for the political leaders of this Board to knock their heads together and give direction to a Plan that can merit political support in ~~the~~ neighboring communities as well as Seaside/Marina.

Neighboring communities cannot be expected to support any ~~any~~ ^{or buy into any DEIR/Plan that does not analyze} Renew Plan that has unacceptable off-site ^{or buy into any DEIR/Plan that does not analyze} impacts. The DEIR sweeps ^{these} under the rug at least five, critical off-site impacts:

- 1) Water supply
- 2) Traffic-congestion -- freeways
- 3) Wastewater disposal capacity
- 4) Taxation of neighboring communities to finance capacity expansions
- 5) View shed -- Any Plan that does not have height limits will have difficulty gaining cooperation of communities west of Seaside. The sight of Embassy Suites is a vivid, daily reminder of disaster already underway

Think a bit about elections. Last March, New Los Padres Dam had 4 detailed engineering/financial plan, regulatory approvals, and well financial advocacy by The Water Board. The bond election lost. So did Karen Strasser-Kaufman; she kept her head down while Fred Keeley opposed The dam.

Can you imagine any candidate for 5th District Supervisor winning in November without taking a position against this Plan? Jeff Davis has already done that. At this moment Sam Farr is hearing from his supporters about their opposition to this Plan. Candidates for Assembly & Senate must soon take positions.

For years to come Seaside and Marina must count on votes from their neighbors to get the political support that is necessary to their development efforts. Don't waste your money on consultants answering questions about a DEIR that is DDA. This Board must refocus planning efforts in directions that give adequate attention to the real concerns of surrounding communities and that can thereby warrant political support of voters in the area.

Mark Christensen

Mark Christensen

2927 Franciscan Way

Carmel



Fort Ord Reuse Authority

DRAFT FORT ORD REUSE PLAN/EIR COMMENTS FORM

If you use this form to submit your comments, it is important that you include your name, address, and phone number below. You can use this form to submit your comments, or you can mail or fax your written comments directly to FORA. Your comments must be received no later than 5:00pm on Friday, August 30, 1996 unless otherwise announced.

Comments should be directed to:

Fort Ord Reuse Authority
100 12th Street Building 2880
Marina, CA 93933
Phone: (408) 883-3672 Fax: (408) 883-3675

PLEASE PRINT THE FOLLOWING INFORMATION:

Name: IRA J. Lively
Address: 1972 LUZERN ST.
City: SEASIDE Zip: 93955 Phone: 899-1699

COMMENTS: (please also use the back of this sheet or attach additional sheets if needed).

Chairman & members of the Board I applaud your efforts to navigate the reuse of Ft. Ord in a fashion that meets the needs and addresses the concerns of all of Monterey County especially Seaside & Marina. However, it would take a miracle equal to that of the immaculate birth of Jesus Christ to satisfy all the people.

A previous speaker used an inaccurate formula to make a point that Seaside & Marina's fiscal loss was much less than stated.

Chairman Barlich and Board Members Bud Nunn speaking as President of the Pacific Grove Residents Assn.

The PGRA has held public information meetings and ~~our board~~ ^{we have} commissioned a subcommittee to review the Reuse Plan and its DEIR.

~~We ask you to grant the proposed~~ extension so that we may better complete our work. As you know, the DEIR is not easy reading and to understand it requires a significant amount of external research. We find that our task is particularly onerous since references to matters of concern to us are very hard to find in these documents. These concerns include regional governance, cumulative impacts, potential financial liabilities, and other matters affecting not just those immediately adjacent to the property.

Our subcommittee has been particularly intrigued by statements in the DEIR ~~such as "the plan is not committed to any construction schedule or funding priority."~~ These ~~seem to be directly contradicted by~~ Plan ~~statements~~ that the FORA board is committed to "facilitating the sale or leasing of property as

expeditiously as possible so that developers ~~and users~~ can "build out the reuse plan as quickly as the market can permit." Such statements seem indifferent to the concerns of local and regional residents and this ^{worries} ~~scars~~ us.

The PGRA report will address this and many other issues. Our main ^{130/265} ~~points~~ ^{of concern} will include the creation of huge demands for water in an area already stricken with severe shortages, and the burdens of significant and unmitigated traffic impacts on a Peninsula that is already overloaded.

We will also request a response to the recent finding of the 5th District Court of Appeals that a Stanislaus County EIR, which is very much like the one before us, violates California's environmental standards.

In summary, we believe that major revision is in order. Especially needed is the definition and analysis of a reuse alternative that gets by with available water at Fort Ord and makes no attempt to force, induce, or accommodate growth beyond levels traditional to the area.

We want to emphasize that the PGRA criticism of these documents does not in any way diminish our respect and compassion for the residents of areas most impacted by the downsizing of Fort Ord. We do, however, ask that our concerns be appreciated and, in this regard, we respectfully suggest that all of us should remember that this property has been paid-for and maintained by the taxpayers of the United States. Future use of the land should reflect this breadth of ownership, and seek to benefit the entire country as well as those immediately adjacent to the property.

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scars

130/265
of concern

(C) Hurs

Flavia

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Fort Ord Reuse Authority

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Marina, CA 93933
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PLEASE PRINT THE FOLLOWING INFORMATION:

Name: LOUISE HALE
Address: 1365 JOSEMITE
City: SEASIDE Zip: 93955 Phone: 394-7013

COMMENTS: (please also use the back of this sheet or attach additional sheets if needed).

I have 2 questions

1. What are EIR requirements for building increase of Ryan Ranch and other proposed building outside of FORA. Are all the residents of Monterey County allowed to tell each city what they can or cannot build?

2. As an citizen of Seaside I would like to see us progress as Monterey, Seaside Beach, Carmel and Pacific become home.



Fort Ord Reuse Authority

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PLEASE PRINT THE FOLLOWING INFORMATION:

Name: Clark Beck
Address: 23765 Spectacular Blvd
City: Monterey Zip: _____ Phone: 655-8586

COMMENTS: (please also use the back of this sheet or attach additional sheets if needed).

(See attached)

addresses positioning of 1500' R.O.W. for Hwy 63 Bypass thru Fort Ord. without benefit of a properly advertised public hearing. Should be a public hearing with an agenda item this major element of the project.

AUGUST 22, 1996
TO FORA

Oct 11th
hearings late Jan

^{beginning to} I ~~don't mean to~~ sound like a "Johnny One-Note" but ^{there is} ~~it seems~~ I ~~have~~ no other choice. Once again my subject is the 1000' wide ROW for the proposed Hwy 68 bypass freeway thru Fort Ord as shown in the Draft EIR. ^{this is a full fledged "just like" EIR} I can find no record of any properly advertised public hearing ever held that addressed the EIR location of the ROW for this freeway. Consequently there has been no public input on this item. The actual location of this ROW ^{was} ~~has been~~ ^{by meetings} privately established between Caltrans and other agencies. I have on 3 separate occasions been told by public bodies that there have, indeed, been public hearings on this matter. Once at a Board meeting ^(Number) by Dr. Cronke on June 11, and twice at FORA meetings by ^a Supervisor ~~xxxx~~ on 6/14 & 7/1. The County Planning Dept disagrees and says there has never been a public hearing on this matter.

w/inputs

(Number) of P.W.

^{detailed}

I also handed a letter on this same subject to your staff after I spoke at your FORA meeting on July 1st. ^{And as late as} Last week I mailed ~~mailed~~ FORA another very detailed letter on this matter and have since made 3 follow up ^{phone} calls to your staff. ^{actually} I ~~even~~ received a call from your staff this afternoon and was told that ^{as of today} no record could be found of any such ^{public} hearing. So now after almost 2 months this seemingly simple question still goes unanswered. Has there or has there not been an advertised public hearing that generalized the particular ^{The} location that the EIR shows for this ROW? If it takes this long to get one simple answer how can any of us be expected to address the entire EIR in the short time you have given us?

I, also, question the entire concept of this freeway. The EIR contains neither the comprehensive planning study nor in depth traffic analysis ^{demanded} for such a major element of this project. Roadways should accommodate development, not the other way around. Caltrans claims they must tie down these easements in advance but this only constricts future planning as well as causes a lot of guessing as to property values in the event that these arterials must, ~~of necessity~~, be later revised.

2

There is too much of our future at stake here to chance it on such an obviously inadequate EIR.

Clark Berk 23765 Spantacular Bid, Monterey, 655-8586

90-2



Fort Ord Reuse Authority

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PLEASE PRINT THE FOLLOWING INFORMATION:

Name: Grace Silva-Santella
Address: 3230 Susan Ave.
City: Marina Zip: 93933 Phone: 883-1861

COMMENTS: (please also use the back of this sheet or attach additional sheets if needed).

- 1 *Residential density* Concerns — water, viewsheds, existing trees on the East side of the Highway need to be protected, design elements so that a hotel the height of Embassy suites can not be built
- 2 Problems that ex. — Traffic problems already exist — Blanco rd. now needs to be 4 lanes, we need some kind of ex-tention to stop the Salinas bound traffic that runs through Marina on Reservation rd
- 3 clarification — Vietnam Veterans of My city will be getting a chunk of land in Fort Ord
- 4 Inconsistencies/ Credibility of other cities — Council approves \$100,000 to promote tourism.
— My. is considering approval of ~~some~~ city Plaza expansion and "Market place" development
— Mayors of MPWD ~~are~~ ask for allotment of 150 acre ft. of water despite controversy

"White Holes" in 2015 plan —

If there is development shown in the white hole areas BLM will immediately ask for the conveyance of the land for habitat "open space".

5



Fort Ord Reuse Authority

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PLEASE PRINT THE FOLLOWING INFORMATION:

Name: SUE McCLLOUD
Address: Box M-1
City: CARMEL Zip: 93921 Phone: 624-7310

COMMENTS: (please also use the back of this sheet or attach additional sheets if needed).

REQUESTED FOR A BOARD
BE PRESENT FOR ALL
PUBLIC HEARINGS.



Fort Ord Reuse Authority

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Phone: (408) 883-3672 Fax: (408) 883-3675

PLEASE PRINT THE FOLLOWING INFORMATION:

Name: MILOS RADAKOVICH
Address: 1199 FOREST AVE. #156
City: PACIFIC GROVE Zip: 93950 Phone: _____

COMMENTS: (please also use the back of this sheet or attach additional sheets if needed).

Q140

- THE GROWTH PROJECTIONS ARE JUST THAT: PROJECTIONS
- "PROJECTIONS" ARE NOT REALITY! PROJECTIONS MADE IN THE 50'S, 60'S, 70'S & 80'S HAVE BEEN SHOWN TO BE OVERESTIMATES. THE LOCAL COMMUNITIES HAVE DEMONSTRATED A RESISTANCE TO THE KIND OF UNCONTROLLED GROWTH WHICH HAD BEEN PROJECTED.
- > THE IMPLICATION IS THAT WE ARE IN A KIND OF "BALLISTIC" FLIGHT (LIKE A THROWN ROCK), UNABLE TO CONTROL OUR COURSE OR DESTINATION.
- > I PROPOSE THAT WE ARE, INSTEAD, IN A CRAFT CAPABLE OF "CONTROLLED" FLIGHT. IT IS ~~OUR~~ WITHIN OUR CAPACITY, INDEED, IT IS IMPERATIVE THAT WE EXERT CONTROL OVER THE COURSE OF GROWTH THAT AFFECTS OUR COMMUNITIES. WE MUST ENSURE THAT UNREALISTIC PROJECTIONS ARE NOT FOLLOWED BLINDLY AND BECOME SELF-FULFILLING, AGAINST THE BETTER JUDGEMENT OF THE COMMUNITIES,

handed in

D:\Mary\Fora.let

Fora members, other officials and Staff:

I have many reservations about the Fora plan and the DEIR, but to my mind the water issue is paramount. I find both these plans inadequate to resolve this issue. The Draft Ft. Ord Reuse Plan states "Water supply is the single most critical resource controlling phasing and buildout for economic recovery."

I have lived on the Mtry. Pen. 22 years, and for all that time no adequate solution to the water delimmma has been found. I rather reluctantly voted for the dam on Carmel River. Many of my friends voted against it thinking that a desalinate plant would be the solution. Does the ^{DFOR} DEIR and the DEIR assume that this is the needed water solution for this Plan? If so, we have some questions regarding such a plant. We know that approx-

imately 6,600 acre feet of water ^{per yr} is currently ~~being used~~ ^{available use by} for CSUMB.

According to the DEIR 18,000 AF of water per year is needed for this plan. If no dam is built on the Carmel River and with a pipeline taking water from farmers is used an additional 10,000 AF would still be needed to implement this plan.

A desalinate plant this size would be the first and only plant this size in the U>S.

The DEIR doen not:

1. Have a specific location for such a plant
2. Have a description of how large the facility must be
3. Have adequate information regarding possible seismic hazards
4. Have a statement of energy needs

Although there are other questions remaining, I consider answers to these few questions critical in an EIR and FORA Plan.

Mary Briscoe 24501 Via Mar Monte, Carmel CA 93923

Mary Briscoe 8/22/96
194



Fort Ord Reuse Authority

DRAFT FORT ORD REUSE PLAN/EIR COMMENTS FORM

If you use this form to submit your comments, it is important that you include your name, address, and phone number below. You can use this form to submit your comments, or you can mail or fax your written comments directly to FORA. Your comments must be received no later than 5:00pm on Friday, August 30, 1996 unless otherwise announced.

Comments should be directed to:

Fort Ord Reuse Authority
100 12th Street Building 2880
Marina, CA 93933
Phone: (408) 883-3672 Fax: (408) 883-3675

PLEASE PRINT THE FOLLOWING INFORMATION:

Name: CAROLYN DLOUHY
Address: BOX 7144
City: CARMEL Zip: 93921 Phone: 626-9424

COMMENTS: (please also use the back of this sheet or attach additional sheets if needed).

I'm in favor of zero population growth. It seems that if the Reuse plan uses the original Ft Ord population as the guide (20,000) there will not be significant impacts on water, traffic, wastewater and other infrastructure. Even with this limitation there is plenty to do to enhance the property. The improvement process will provide jobs and increase the economic base of the area.

I would like to see an agency for long range planning and management of the Monterey Peninsula that unites all of our local communities in a positive way.

~~From~~ Wallace B. Wilson and 855 Ocean View -
Thelma Wilson -
residents of Pacific Grove -

Having recently attended a workshop

regarding the FORA plan. I am

particularly concerned about two major

aspects of the proposed plan

1) - Where-oh-where - will the necessary
water come from to support this
gigantic proposal?

2) Where-oh-where - will money/come ²
from to improve-enlarge-support
the highways needed throughout this
developed land area?

Before this gigantic-horrifying plan
is approved answers must be found
to these two problems.

I plead with you - please take time to
re-think-revise - find solutions to
these proposals mentioned. The future
of this beautiful peninsula is too
precious to destroy. Thank You

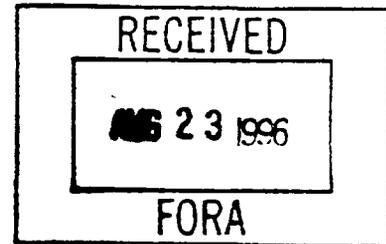


FORT ORD PROJECT
Monterey Bay Education,
Science, and Technology Center
(MBEST Center)

SANTA CRUZ, CALIFORNIA 95064

August 20, 1996

Mr. Leslie White
Executive Officer
Fort Ord Reuse Authority
100 12th Street, Building 2650
Marina, California 93933



Re: Comments on Fort Ord Reuse Authority Reuse Plan and
Business and Operations Plan

Dear Mr. White:

On behalf of the University of California Monterey Bay Education, Science, and Technology Center (UC MBEST Center) planning team, I submit the following comments to the Fort Ord Reuse Authority (FORA) based on our review of the Fort Ord Reuse Plan and the Business and Operations Plan. Our comments on the accompanying Environmental Impact Report (EIR) will follow under separate cover. The comments we include in this letter and its attachment are submitted to assist FORA in improving the final text of these documents. We support FORA's efforts toward reuse of the former Fort Ord and are prepared to offer any assistance that may help FORA finalize its Reuse Plan and supporting documents.

Comments included in the body of this letter are considered by the UC MBEST Center team to be either global in nature or of significant importance. We respectfully request that they each be addressed in the document edit process. In addition to the priority issues we have attached a more detailed list of our requests for edit attention. Thank you in advance for your serious consideration of our requested changes to the document.

1. The FORA draft Business and Operations Plan summarizes in the key strategic assessment section that the job creation success of the reuse effort will, most specifically, depend upon the success of the UC MBEST Center. This statement is consistent with the Denise Duffy report commissioned by the Army some years ago. Yet, despite this highlighted importance, the UC MBEST Center effort is treated inconsistently within the FORA planning documents. The FORA reuse planning documents in many cases fail to identify the UC MBEST Center in tables, graphics, and text; provide little discussion or acknowledgment of the benefits and opportunities afforded the basewide effort by the UC project; burdens the project with higher assessments; and fails to create priority options of infrastructure development for the UC MBEST Center, and thus job creation opportunities. We ask that the UC MBEST Center job creation effort be appropriately acknowledged and supported throughout the planning documents.
2. No text or graphic descriptions of the landfill parcel (Polygon 8a) should assert UC ownership or habitat management responsibility for that parcel. Ownership of this parcel is still under consideration. The Reuse Plan documents should note that eventual transfer to

either UC or FORA will be in accordance with the recent Habitat Management Plan modification.

3. The UC MBEST Center consists of polygons 7a, 7c, 9b, 8b, and 8c. Text and graphics do not yet make it clear to the reader that the two parcels screened for transfer to UC adjacent to 7th Avenue (parcels 8b and 8c) are also part of the UC MBEST Center. UC is screened to acquire parcels 8b and 8c and intends to treat these parcels as part of its MBEST Center. We request that wherever any of these parcels are described in text or graphics, that they be indicated to be part of the UC MBEST Center. (Many maps do not note the UC MBEST Center but do note CSUMB and the city of Marina. We request equal graphic representation.) Since UC has not yet prepared plans for parcels 8b and 8c, the FORA Reuse Plan EIR need not identify impacts for these parcels in the section that re-states UC MBEST Center impacts. The total square footage for the UC MBEST Center at the airport remains 4.4 million square feet.
4. Please correct all text and graphics to delete "MBEST Cooperative Planning District" and to replace that reference with "UC MBEST Center." No other entity's parcels are referred to as a cooperative planning district. Therefore we feel it inappropriate for the UC MBEST Center to be given this designation.
5. UC Natural Reserve System lands consist of polygons 7b, 9d, 6b, and 5c. These lands were incorporated into the UC Natural Reserve System in June of this year. They should be identified in text and graphics as the "UC/NRS Fort Ord Natural Reserve". At the first mention of the "UC/NRS Fort Ord Natural Reserve", the text should state that this is part of the statewide University of California Natural Reserve System, established to provide for teaching and research in and about natural systems.
6. The Reuse Plan refers to FORA member agencies in the context of voting power and/or requirements to demonstrate consistency with the FORA Reuse Plan. In this sense, The University of California is not a FORA member agency. This distinction should be reflected consistently and visibly in the Reuse Plan.
7. The Business and Operations Plan is difficult to read and inconsistent. It is presented as a compilation of various reports without smooth integrtion. At a minimum, this document would be far more readable if it had an executive summary of findings and outstanding policy issues and if it had glossaries for technical terms and abbreviations.

Thank you for offering the UC MBEST Center team an opportunity to comment on these documents. We are available to discuss any of these comments further.

Sincerely,



Lora Martin, Director
UC MBEST Center
(408)459-3652

enclosure

cc: J. Musbach, EPS
UC MBEST Center Planning Team

Additional Comments on FORA Reuse Plan and Business & Operations Plan

FORA Reuse Plan Volume I

- Global: The author repeatedly misuses the word "comprise". One example is page 3-101, 3rd paragraph, where it is stated, "The portions of UC MBEST in the County are comprised of two major areas..." This word is commonly misused by planners and this misuse is frowned upon by grammarians. The word "comprise" is similar to "takes in" or "is composed of". For example, the whole comprises its parts. The whole is not "comprised of" its parts. The sentence on page 3-101 could be changed to state, "The portions of UC MBEST in the County comprise two major areas..." Alternatively, the word "comprise" could be avoided entirely and in this example the sentence could be written to state, "The portions of UC MBEST in the County consist of two major areas..." 2
- Global: The numbering of several tables appears to be in error. 3
- Global: Check the date when the closure was announced. For example, on pages 1-5, 1-9, and 2-2, the report says the closure was announced in 1990. Wasn't the first announcement made in 1991? 4
- Page 1-2: Second to last paragraph should also indicate UC, CSU, and State Parks as land use jurisdictions. 5
- Page 1-7: Last sentence of largest paragraph incorrectly states that the LRA must share any net proceeds from real estate transactions, after subtracting the cost of infrastructure improvements. The terms have not yet been set and could differ from the statement. 6
- Page 1-7: In the paragraph/section "PBC, EDC Process" it can be incorrectly interpreted that FORA has authority/jurisdiction over property conveyed to the California Department of Parks and Recreation, The Regents of the University of California, and the Trustees of the California State University. The Reuse Plan should consistently and accurately state the limits of FORA authority with regard to state and federal agencies' land use decisions. 7
- Page 1-8: Second to last bullet should indicate that the 600 acres received by the UC Natural Reserve System is adjacent to the UC MBEST Center (as well as in the Marina Municipal Airport area). (Please note, the actual acreage is 605.3.) 8
- Page 1-12: "Public Uses..." states that 85 to 86% of the lands are reserved for public use. Does this include the portion of the impact area that will be fenced in perpetuity to exclude human entry? That hardly seems like a public use. 9
- Page 1-16: The first paragraph uses the phrase "under optimal conditions". Shouldn't this be "under realistic assumptions"? 10
- Page 1-18: First paragraph under 1.2.2--list all land use jurisdictions, including UC, CSU, and State Parks. 11
- Page 2-7: First full paragraph, change "the research center" to "the UC MBEST Center". 12
- Page 2-10: Third line of second to last paragraph--"Valley" should be "Salinas valley". The same applies to the first line of the last paragraph. 13

- On page 2-13, in the paragraph/section following the wage and salary table, the report uses the term "desegregate" when it appears that the term "desegregate" is appropriate. Desegregate does not seem to apply in this case. 14
- On page 2-19 in the 2.3 paragraph/section "MARKET OPPORTUNITIES" and the table on the following page, there are discrepancies in listing the total amounts of square feet in a number of categories. This is confusing, and it appears that the figures from the table don't add up in the numbers in text. For example, the text indicates that a total of 2,544,000 square feet (1,794,000 + 750,000) of office/R&D will occur on Fort Ord in the text, but only 1,794,000 is reflected on the tables 2.3.1 and 2.3.2 unless it is included as a portion of the 925,000 square feet of "induced demand" which is not defined until page 2-26. Some notation should be made on the table to help clarify the difference. Another would be that the number of new housing units differs by 270 units from the text (section 2.3) to the table, although text in section 2.3.3 agrees with the table. 15
- Pages 2-21 to 2-24: the bulleted statements of square footage do not appear to relate properly to the adjacent text. Also, totals should be provided at the bottom of each set of bulleted statements. 16
- Page 2-33: Last paragraph in "Lodging Facilities" section should also state that the UC MBEST Center is expected to generate the need for a related conference and lodging facility. 17
- Page 2-37: First paragraph replace "FORA will be submitting an EDC application" with "FORA may submit an EDC application". 18
- Page 3-4, the Landscape Setting graphic should include the "UC/NRS Fort Ord Natural Reserve" parcels as part of the landscape setting. These parcels will provide a substantial amount of open space visible to persons traveling on Reservation Road or the extension of Blanco Road, and is therefore an important landscape element. 19
- Page 3-5, which depicts Mixed Use Villages, indicates a cluster near the airport as "UC MBEST". A small cluster should also be drawn where parcels 8b and 8c are located (on the north edge of CSUMB at 7th Avenue) and this should also be indicated as "UC MBEST". 20
- Page 3-11: The graphic should identify which entity will have jurisdiction for the "University Office Park/R&D District". Is it CSUMB or Marina? 21
- Page 3-19: Since the UC/NRS Fort Ord Natural Reserve and other managed habitats provide enjoyable open space areas, the existence of these lands should be acknowledged under "Landscape and Open Space". 22
- Page 3-32: In the paragraph/section noted as "Fritzsche Field Area," the Reuse Plan incorrectly describes some elements. The runway is 3,000 feet not 4,000 feet as indicated, and the water tower is checked, not striped as stated in the text. 23
- Figure 3.2-5 should include shading to indicate that parcels 8b and 8c are part of the UC MBEST Center and should provide a separate shading for the UC/NRS Fort Ord Natural Reserve areas. 24
- Figure 3.3-1 should include "UC MBEST" in the graphic, just like "CSUMB" and "Municipal Airport". 25
- Figure 3.3-1: This designates UC MBEST Center lands (Parcels 7a, 7c, 9b, 8b, and 8c) as "Planned Development Mixed Use." According to Table 3.4-1, "Planned Development Mixed Use" does not include many of the uses described in the Sedway Cooke MBEST Center Master Plan Study (Appendix A), which was provided to FORA as the basis for planning efforts 26
↓

regarding the UC MBEST Center. For example, R&D uses are not permitted in the Planned Development Mixed Use district. Furthermore, it is not clear that a conference center, or scientific oriented production-assembly, both of which have long been components of UC MBEST Center plans, would be permitted in the Planned Development Mixed Use district. The FORA Reuse Plan needs to be revised to permit all uses envisioned in the UC MBEST Center. We recommend you indicate that on all UC MBEST Center parcels (Parcels 7a, 7c, 9b, 8b, and 8c) development consistent with the "Planned Development Mixed Use" district, the "Office/R&D" district, and the "Business Park/Light Industrial district is permitted by the FORA Reuse Plan.

Figure 3.3-1: The "Hotel Opportunity" site is shown on the north side of Reservation Road. It should be noted that a final location might be on the south side. Our planning currently would permit this, and we would hope that the designation for these areas will continue to offer the flexibility to locate a business hotel/conference center in either location. 27

Figure 3.2-5 (following page 3-35) should include "UC MBEST" in the graphic, just like "CSUMB Campus" and "Bureau of Land Management". Graphic should include "UC MBEST" shading for parcels 8b and 8c. Legend should state "UC MBEST Center and UC/NRS Fort Ord Natural Reserve. 28

Page 3-37: The text under "UC MBEST Center" should indicate that an additional area of approximately 50 acres (polygons 8b and 8c) is anticipated to be transferred to UC and become part of the UC MBEST Center in the near future. 29

Page 3-37. The two paragraphs under "UC MBEST Center" should indicate that the UC MBEST Center consists of 483.9 acres of land, of which 437 acres are located in the vicinity of the Marina Municipal Airport, and that the UC/NRS Fort Ord Natural Reserve consist of approximately 605.3 acres of land. The UC/NRS Fort Ord Natural Reserve is distinctly separate from the UC MBEST Center, although its management will be funded, in part, from proceeds from the UC MBEST Center. 30

Page 3-37: Second paragraph under Marina Municipal Airport—remove the last sentence that describes UC's intent to negotiate an MOU. This level of detail is unwarranted and inconsistent with treatment elsewhere in the report. For example, UC's intent to negotiate an MOU with the County is not mentioned, nor are possible intentions of other land use jurisdictions. 31

Page 3-41: The description of the Development Capacity table (third paragraph) should treat UC MBEST Center similar to CSUMB, as has often been requested by UC. 32

Table 3.3-1: UC MBEST Center should be included as a separate item in this table, consistent with UC's long standing request to have the Reuse Plan clearly identify UC MBEST Center development. 33

Page 3-43: In the last sentence, replace "potentially" with "expected". 34

Table 3.4-1: This table should indicate that experimental agricultural is a permitted use within Office/R&D. Agricultural linkages are a significant element of the UC MBEST Center program and will be facilitated by the opportunity to engage in limited experimental agriculture. 35

Figure 3.5-2: California Avenue should not be depicted as extending through the UC/NRS Fort Ord Natural Reserve. Such an extension is under discussion by UC and the city of Marina, but it is not certain at this time that such an extension can be feasibly mitigated. 36

On Page 3-62 there is a notation expressing concern about the location of the California Avenue Extension north of Reservation Road, but the concern is not clarified. The text should note that the 37

roadway is proposed through prime habitat in a portion of the UC Natural Reserve System's Fort Ord Natural Reserve and that the University of California and the City of Marina are engaged in discussions regarding the appropriate location of the roadway extension and the nature and extent of required mitigations. The text should also note that this alignment is not discussed or evaluated in the Habitat Management Plan. The University of California and the City of Marina recently requested funding for a study that could help determine whether any feasible measures exist to adequately mitigate the effects of extending California Avenue through the UC/NRS Fort Ord Natural Reserve. Until a long-term study is completed on the subject we believe that the Reuse Plan should refer to the extension of California Avenue as an item under discussion only.

Page 3-86: The UC/NRS Fort Ord Natural Reserve should be described with at least the level of prominence given to the CSUMB campus on this page. 38

Figure 3.6-2 doesn't indicate the UC/NRS Fort Ord Natural Reserve lands (parcels 7b, 9c, 6b, and) as "HMP Reserve and/or Corridors" These should be added to the graphic to make it consistent with the HMP. 39

Page 3-89: The first paragraph should not state that the landfill parcel would be managed by the University of California as a practical laboratory for environmental engineering. This parcel may or may not be transferred to the University of California and the University of California has not prepared plans for its use. 40

On Page 3-89 there is an incorrect assertion that UC will manage a potential future recreation area on the landfill. While the UC Santa Cruz campus is considering the option of managing land at the landfill if UC accepts ownership or if another owner seeks management by the UC Santa Cruz campus, it is not yet affirmed that the UC Santa Cruz campus will manage this habitat. This is also not consistent with terms included in the draft HMP. Also, the text asserts that the landfill cap will be designed to support public commercial recreation, which is not consistent with the design recently described by the U.S. Army and the contractor installing the cap. 41

Figure 3.6-2: "UC MBEST" should be indicated in the graphic, in a manner similar to the way "CSUMB" is indicated. 42

Figure 3.6-2 indicates polygons with opportunities for Oak Woodland Reserve Areas, but the Conservation, Open Space and Recreation Element doesn't specifically address oak woodland preservation. All oak woodland protection policies should be cross-referenced in the Conservation, Open Space, and Recreation Element. 43

Table 3.3-1: Replace "MBEST Cooperative Planning District" with "UC MBEST Center", correctly reference "UC/NRS Fort Ord Natural Reserve". 44

Table 3.8-1: Change "MBEST Cooperative Planning District" to "UC MBEST Center". 45

Figure 3.8-1: Change "MBEST Cooperative Planning District" to "UC MBEST Center". Also, separately identify the "UC/NRS Fort Ord Natural Reserve". This will be funded and possibly managed separately from Marina's habitat lands. 46

Page 3-100: The term "UC MBEST Center Cooperative Planning Districts" is used on this page and others, yet it is not clear why the term "Cooperative Planning District" is used with regard to the UC MBEST Center but not with regard to CSUMB, BLM, or other State and federal agencies. To maintain consistency with the treatment of other State and federal agencies, we suggest that you change this and all other references to "UC MBEST Center Cooperative Planning District", replacing them with "UC MBEST Center". Specifically, change the title of 3.7.2 to "University of California / UC MBEST Center" or "...UC MBEST Center Planning District". Simplify the first 47

paragraph to state, "The UC MBEST Center and UC/NRS Fort Ord Natural Reserve are located in the City of Marina and in Monterey County. The UC MBEST Center and the UC/NRS Fort Ord Natural Reserve will total approximately 1,087 acres upon completion of anticipated land transfers from the U.S. Army. Current planning for FORA projects 5.0 million square feet to represent the ultimate development capacity for the UC MBEST Center." (There is no need to go into the history of changes to planned densities.) Also indicate in this section that two additional parcels (8b and 8c) are part of the UC MBEST Center, but have not yet been master planned by UC and therefore are not included in presentations of square footage or other development characteristics.

Pages 3-100 et. seq. state the uses that will be at UC MBEST Center, including 150-room hotel and residential land use. Also business park/light industrial and office/R&D, with the assumption of 5 million square feet of potential development at buildout. This will slightly exceed our current planning for polygons 7a, 7c, and 9c, and could be adjusted without impacting the analysis of the 2015 scenario. Please note the reduction to approximately 4.4 million square feet in the future revisions for the buildout scenario.

Page 3-101: Second paragraph--Please remove the last two sentences. The ultimate role of the property was not previously "dull". Also, the new UC MBEST Center Master Plan is likely to be available for review before the final FORA Reuse Plan is completed, therefore the reference to the 1995 study is unnecessary.

Page 3-113 The "University Office Park/R&D Office District" section should identify polygons 8b and 8c as part of the UC MBEST Center. These are screened to be acquired by the University of California and we intend to operate them as part of the UC MBEST Center.

Page 3-133 states incorrectly that the former landfill site is expected to be conveyed to UC for the purposes of habitat protection and management of the land fill-clean up activities initiated by the U.S. Army. This is not consistent with terms included in the draft HMP as recently published, and as approved by the FORA Board in its April meeting. This should be corrected to reflect the current FORA Board approved designation and use of this polygon.

Page 3-135 appropriately includes a portion of the UC MBEST Center in the Reservation Road Planning Area, but incorrectly notes the acreage as 267 acres. It is also described as 267 on page 3-101; and Table 3.10-1. This area is noted elsewhere in the documents as 267.7 acres or 272 acres. Our calculations, based on our final recorded parcel for this area is 272 acres which matches our calculations and the conveyance documents from the U.S. Army.

Page 3-156 et. seq.: The report should make it clear to the reader where FORA authority is limited with respect to UC, CSU, State Parks, other state agencies, and federal agencies.

Comments on FORA Reuse Plan Volume 2

Global: All UC MBEST Center lands (Parcels 7a, 7c, 9b, 8b, and 8c) should be indicated as lying within an overlap of the Planned Development Mixed use district, the Office/R&D district, and the Business Park/Light Industrial district. None of these districts alone permits the uses that have been planned to be part of the UC MBEST Center project.

54

Page 4-11: Paragraph 2—there is a notation that a public benefit conveyance is the mechanism that transfers land from the U.S. Army to the University of California. This is incorrect. The conveyance is being accomplished through the provisions of federal law that allow for an economic development conveyance, and are defined as such in a Memorandum of Agreement between the Army and UC. This is further memorialized in the deed that served to document the transfer of 950 acres to UC in September 1994.

55

It is also noted on page 4-11 that this conveyance is to the "University of California for the Monterey Business, Education, Science and Technology Center." It should that this conveyance is to the "University of California for the Monterey Bay Education, Science, and Technology Center" and for the "UC/NRS Fort Ord Natural Reserve."

56

The modifications to the HMP, including the letter with regard to the landfill property is not referenced in this or other volumes. These modifications were intended to be included in the U.S. Army Supplemental Impact Statement (SEIS), and are specifically referenced in the draft HMP. These modifications must be appropriately referenced or reprinted in this volume.

57

Page 4-97: Blanco extension is described as a two-lane roadway. It is shown as 4 lanes elsewhere. This appears to be an inconsistency.

58

Figure 4.2.4: This should indicate that parking lanes are not required on urban streets if adequate on-site parking is provided. By allowing jurisdictions to plan alternatives to on-street parking we will be able to reduce potential conflicts with bicycles and reduce the overall amount of impervious surfacing.

59

Page 4-107 of the Reuse Plan: Program D-1.2 says each jurisdiction shall provide on-street parking on all urban roadways for persons with disabilities. On-street parking may not be the best solution for persons with disabilities, especially if the main entrance of a building is far from the street. This program should be changed to state, "Each jurisdiction shall provide adequate parking in urban areas for persons with disabilities, either as on-street parking on urban roadways or as on-parcel parking."

60

Page 4-180: top of page, reference to Table 4.2.2 should be Table 4.4-2

61

Page 4-217: The cultural resources section appears to overlook an archaeological survey prepared by the Army and entitled, "A Cultural Resources Survey of 783 Hectares, Fort Ord, Monterey County, California". This survey covers land in the vicinity of the Marina Municipal Airport.

62

Page 4-242: Noise Policy B-9 should refer to the County, not the City.

63

Page 4-264: Program A-2.1 should refer to "UBC", not "UCB".

64

Habitat Management Plan Exhibit C incorrectly shows UCNRS as having responsibility for management of the landfill (SR3). No agreement has been made with regard to which single agency will be responsible for managing the landfill. The text should be revised to reflect this.

65

FORA Business and Operations Plan

Global: The Business and Operations Plan identifies costs for the management of habitat lands, but it is not clear where these numbers were generated, as they differ from those appearing in the Biological Resources Management Planning document prepared in September 1995 by Zander Associates. Pages page PFIP 1-41 and page PFIP 3-21 of the Business and Operations Plan present the capital costs of the habitat management plan and Exhibit 5, page II-20 presents a fee structure to fund capital costs. It is not clear what the annual operation costs of the HMP will be and how they will be funded. Because successful implementation of the HMP is crucial to the success of base reuse, annual operating costs must be fully addressed.

66

Page 1-3: First paragraph should identify ex officios.

67

Page 1-4: First paragraph should reference SB900 and UC/CSU's ability to acquire lands through an EDC conveyance as LRAs.

68

Exhibit 1A: UC should be shown as having police responsibilities for UC/NRS Fort Ord Natural Reserve and UC MBEST Center lands, similar to the notation for CSUMB lands. These responsibilities may be delegated to the City of Marina under an MOU. Also, lines for Storm Water and Water Supply and Distribution are not filled out.

69

Page I-9: Clean-up of Hazardous Materials. The Reuse Plan should specifically identify ways to expedite clean-up of contaminated areas.

70

Page II-1: Physical Setting. Fort Ord's physical setting is not "incomparable", as stated in the text. In fact, the appearance of major access routes to Fort Ord could be improved. For example, the Reservation Road corridor from Highway 1 could be improved with landscaping or other physical treatment. The Reuse Plan should emphasize the need to concentrate on improving strategic corridors to Fort Ord. This is also briefly addressed on Page III-2 of the Comprehensive Business Plan (#5 under Community-building Strategy).

71

Page II-1, 3. Presence of Premier Educational Institutions - Change footnote from University of California, Santa Cruz (UCSC) to University of California Monterey Bay Education, Science and Technology (UC MBEST) Center.

72

Page. II-2, 4. Strong Base of Research Institutions - Remove paragraph and replace with

73

"The Monterey Bay research crescent is a rich resource of innovation and technologies available from the numerous research and educational institutions (a total of 20 have been identified to date). The research crescent is emerging as a leader in disciplines with applications in diverse markets such as: environmental technologies and applied instrumentation; biotechnology, especially in agriculture and marine applications; information science and engineering; education research (K12 to lifelong learning) and multimedia applications to both education and entertainment; and language instruction. The UC MBEST Center will draw upon and link the talents of the regional institutions to each other, to public and private sector entities that will relocate to or participate in the newly formed UC MBEST Center at Fort Ord, and to national and international regions and institutions. The UC MBEST Center is planned to be a place of innovation and development that will help to position the Monterey Bay region and Central California competitively in the global

economy of the coming decades.”

Page II-2: First paragraph--The sentence fragment, "...planned technology transfer centers that are planned with the UC MBEST Center" is awkwardly worded and incorrect. Revise to read, "These research institutions include marine biology, astronomy, the Naval institutions, and public and private institutions that will be associated with the UC MBEST Center." 74

Page II-3: First paragraph states, "Attitudes on the part of the educational institutions that ignore this reality are counterproductive." This implies that educational institutions such as CSU and UC have ignored the fiscal difficulties facing local governments. As such, the statement is incorrect, is unacceptable to UC, and must be removed. 75

Page II-3: "Infrastructure Capacity and Costs"--Add to the end of the last sentence "... that showed initial basewide assessments to be prohibitive to UC MBEST Center success." 76

Page II-3: "Lack of Control over Major Properties within Fort Ord"--The first sentence implies that some organizations went around FORA. It would be more accurate to say "Numerous transfers of Fort Ord property from the Army to various organizations occurred under the planning umbrella of the Fort Ord Reuse Group (FORG), prior to creation of FORA." 77

Pages II-3 and II-14: There is a reference in two locations to the "Preliminary UC MBEST Business Plan", prepared in the summer of 1995. The appropriate title is "Baseline Operations Plan and Financial Analysis". The reference to an "Initial Operations Plan" (published in June 1995) should also be changed to "Baseline Operations Plan and Financial Analysis". 78

Page II-6: Light Industrial. Typical light industrial properties in the area rarely sell for \$6.50 per square foot. The text should present a range that is more representative of typical light industrial transactions. 79

Page II-13: "Access between Fort Ord and Silicon Valley..." . We agree that a high priority should be placed on improving the access between US 101 and Fort Ord. All efforts should be made to emphasize that this improvement would be of County-wide significance. 80

Page II-14: First paragraph. While it is true that in many places economic development is a "zero-sum game", the efforts of the UC MBEST Center program to create net new economic growth for the region should be recognized. 81

Page II-14: Third paragraph, last sentence should be changed to read, "In other words, the capital costs of infrastructure, particularly offsite, basewide infrastructure, were estimated..." This makes it clear to the reader that the issue was larger than just the UC MBEST Center. 82

Page II-15: Energy Supply Systems. It is important to place emphasis on improving the electrical power grid to increase stability. For example, attracting large scale R&D users could require upgrades to create a "dual" system. 83

Page II-16: Second sentence of second paragraph is redundant and should be removed. 84

Page II-18: "Necessary Demolition" Please state whether or not costs of demolition are included in the feasibility equations and state how they will be paid for. 85

Exhibit 5: Why is the total burden of development per acre higher for the UC MBEST Center than for nearly all other land uses? Unless this figure is in error, it appears that the Reuse Plan is not facilitating development of the intended primary job generator on the former base. 86

- Exhibit 1A: UC should be indicated as having police responsibilities, even though these responsibilities may be carried out by the city of Marina through a future MOA. 87
- Page III-1: The "Market Strategy" section should state the importance of coordinated marketing and leveraging of marketing opportunities. It should also acknowledge that the UC MBEST Center and CSU Monterey Bay will be addressing different markets than the rest of the base and will therefore have a separate marketing strategy. 88
- Page III-3: Largest paragraph: "Monterey Crescent" should be changed to "Monterey Bay Crescent". 89
- Page III-3: While the name of former Fort Ord may not have "cache" in international circles, it does have market recognition by more than one million former soldiers (many of whom are in the age bracket of company relocation decision makers) who have gone through its gates. This name recognition should be considered as part of the marketing strategy. 90
- Page III-14: "UC MBEST Center" paragraph--change "MBEST Cooperative Planning District" to "UC MBEST Center" 91
- Page III-14: The "UC MBEST Center" paragraph gives the reader the impression that the FORA consultant team has determined, based on its own work and ingenuity, that the UC MBEST Center is appropriate for office and research and development use. The paragraph further implies that the FORA team has targeted a specific 11-acre area for the first phase of development. This paragraph should be rewritten to reflect the fact that the UC MBEST Center has been planned by UC with the assistance of consultants. It should also be rewritten to make it clear that it is the FORA business plan that is assuming a market absorption of 11 acres in the first stage of development. If you wish to more clearly describe phasing concepts, UC would be happy to provide you with the phasing diagrams that have been prepared by our consultants. 92
- Figure 3.3-1 Hotel Opportunity Site is shown north of Reservation Road. It is possible that UC will locate a conference hotel below Reservation Road and the text should state that either site may serve as a "Hotel Opportunity Site." Add "UC MBEST" to the graphic. 93
- Page IV-1: CSUMB is discussed separately, but the UC MBEST Center is not. Please treat both institutions similarly. 94
- Page IV-6: Under "UC MBEST Capacity", please state that the UC is currently preparing a master plan for the UC MBEST Center plan, and is forecasting 4.4 million square feet at buildout, even though the FORA plan is assuming 5 million square feet. 95
- Page IV-18: Paragraph 2 identifies a cash flow of \$102.4 million. Paragraph 3 identifies a surplus of \$41.2 million over 20 years. These numbers are difficult to find (we have been unsuccessful) in the accompanying tables. Please provide a better linkage between tables and text. 96
- Page IV-23: states that UC MBEST developers are assumed to pay \$64,897 per acre of land area for development fees/special taxes. It is not clear how this relates to the notations in later sections about the \$263,000 capital costs per acre. Please state clearly in the text whether the \$64,897 will pay for all costs associated with off-site development that are not covered by rate-based financing. 97
- Exhibit 9 indicates about \$8,800,000 in development fees from the UC MBEST Center. The report should state explicitly that the financing model does not assume FORA will receive any UC MBEST Center land sale proceeds. 98

Exhibit 9: FORA operating costs appear to be excessive. An operating budget of approximately \$500,000 appears to be adequate and more appropriate.

99

Page IV-26: Second line of last paragraph indicates a net fiscal deficit of approximately "\$20.0" during the 20-year development period. This is an extremely small number. Please double-check.

100

Exhibit 13: Please indicate whether or not the exhibit includes the cost of improvements to Highway 156.

101

Exhibit 13: Because of the way this exhibit aggregates funds, it appears that the Mello-Roos fees are being used to pay for non-infrastructure items. We assume the accounting framework created by the Reuse Plan would dictate that Mello-Roos moneys are directed toward infrastructure capital and maintenance only. This should be stated explicitly to reduce the potential for misunderstandings.

102

PFIP 1-17: Paragraph 4 states that all property taxes will be needed to pay for on-going services and therefore Tax Increment Financing cannot be used. This conflicts with many previous comments and eliminates a valuable redevelopment tool. This issue should be given careful thought before an implementing policy is adopted.

103

PFIP 1-18: First full sentence should be augmented to include the University of California (UC) among the agencies whose HMP management costs will not be financed by a uniform benefit assessment. UC accepted the 600 acres of habitat land based on the understanding that we would manage it at our own expense and be freed of basewide habitat management fees. The tables in the Business and Operations Plan are consistent with this understanding, but the text needs to be modified to avoid misunderstandings.

104

PFIP 1-28 Indicates that Reservation Road from Blanco Road to the Ft. Ord boundary will be widened from 4 to 6 lanes. Please check with your traffic engineer to see if this width is necessary provided that Blanco Road extension is constructed in the near future.

105

PFIP 1-32 indicates that Blanco Road Extension will be built in the 2001 through 2005 period, yet other portions of the document indicate development of this road segment would occur later. We have recommended that this segment be constructed before widening Reservation Road between Blanco and Imjin to six lanes. We believe that with Blanco Road extension, Reservation Road might not need to be widened to six lanes between Blanco and Imjin roads. We recommend that this inconsistency be resolved in favor of retaining the Blanco Road extension in the year 2001 to 2005 timeframe.

106

PFIP Figure 1-3: This table shows transportation improvements through the year 2015. It does not depict, but should depict, the extension of Blanco Road noted on PFIP 1-32.

107

PFIP Figure 1-3: Page 1-35--A desalination facility is included, yet it is not clear that direction has been given to pursue a desalination plant. Please provide an explanation for including the desalination plant in this table or delete the reference.

108

PFIP Page 2-7: Table indicates UC MBEST Center water demand at .0001 acre-feet/year/square foot, whereas the FORIS study indicated a water demand of .00012. Please use the FORIS study figures in this document or explain why alternative figures have been used. Also, please confirm that the figure on PFIP 2-8 for UC MBEST Center "Water Demand Basis of Wastewater Flow" is consistent with the figure ultimately used on page 2-7 for the UC MBEST Center.

109

PFIP 2-23 contains Set 3, the Summary cost screen for all capital improvements. The total burden of development costs is shown to be \$263,546 per acre, which translates to 6.05/square foot. The

110

accompanying text should explicitly state that this does not reflect the reallocation resulting from imposition of a one-time Mello-Roos fee.

110

PFIP 3-8 Project T-6 is the widening of Reservation Road from 4 to 6 lanes. Please see comment above, this may be unnecessary if Blanco Road is extended.

111

PFIP 3-15 Project T-40 shows Blanco Road extension being a 4-lane arterial, to be constructed in the year 2004. This statement and others referring to Blanco Road should be made consistent with each other.

112

PFIP Page 3-18--A desalination facility is included, yet it is not clear that direction has been given to pursue a desalination plant. Please provide an explanation for including the desalination plant in this table or delete the reference.

113

PFIP Page 3-24: The Project Description Cell for Habitat Management should state parenthetically that BLM, State Parks, and UC carry their own costs.

114

PFIP page 3-32, last sentence before "Transition Strategy...": "the Airport area" should be changed to "the UC MBEST Center, Marina Municipal Airport, and the Marina Business Park." Also, change "public benefit transferees" to "entities" (UC is not a public benefit transferee--the Army is transferring land to UC through an EDC).

115

PFIP page 3-39: first paragraph states that conveyance of the water supply system from the Army to FORA through a PBC warrants a favorable response, but no justification is given for this statement. Please provide full justification why this alternative is favorable when compared with an EDC or private ownership.

116

PFIP page 3-39: Second to last bullet mentions "desal" water rates, but desalination is not an adopted option. The item should be reworded so as not to imply that a decision has been made to pursue a desalination option.

117

PFIP pages 3-40 et seq.: Several references are made to desalination facilities. Please state clearly at the beginning of this section the current FORA Board position on the issue of desalination.

118

PFIP page 3-60: The discussion of the Historic Allocations plan should state explicitly that since the UC MBEST Center had very little water use historically, this option would prevent development of the UC MBEST Center and foreclose the economic benefits that would otherwise accrue from it.

119

PFIP 3-67: A Negative Factor for this figure should be "Forecloses UC MBEST Development".

120

PFIP 3-73: Footnote the bottom of the table to indicate that the weighting is arbitrarily assigned by the consultant.

121

PFIP 4-3: It would be helpful for the report to summarize outstanding policy issues here.

122

PFIP page 5-7: This table and the accompanying text should state when the special tax will begin to be collected.

123

Public Services Plan, Page 6: The UC MBEST Center should be included or an explanation should be given in the table or accompanying text.

124

Public Services Plan, page 8: Last sentence of third paragraph states, "A consensus appears to be emerging that a joint powers authority would be a practical means to achieve a single unified

125

agency with responsibility for water supply." Please check to see if this statement is still accurate, and modify, if appropriate.

125

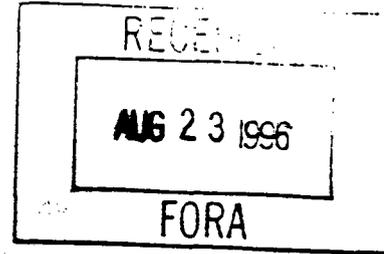
Public Services Plan page 54 et seq.: Tables 4-9 through 4-12--change "MBEST Cooperative Planning District" to "UC MBEST Center".

126



City of Salinas

PUBLIC WORKS DEPARTMENT • 200 Lincoln Avenue • Salinas, California 93901 • (408) 758-7241



August 20, 1996

Ann Hebenstreit, Planner
Fort Ord Reuse Authority
100-12th Street, Building 2880
Marina, California 93933

RE: LETTER OF COMMENT ON DRAFT EIR FOR FORT ORD REUSE PLAN

Dear Ms Hebenstreit:

Thank you for the opportunity to review the Draft Environmental Impact Report (DEIR) for the Fort Ord Reuse Plan. The City has previously commented on the Notice of Preparation for the referenced project and has the following comments.

Transportation Issues

The Final Environmental Impact Report (FEIR) or a revised Draft Environmental Impact Report (DEIR) should fully identify the project's expected traffic impact on Davis Road and Fort Ord's contribution to mitigating that impact. The recent release of Working Paper #3 on Fort Ord's Reuse Plan by JHK & Associates included that traffic consultant's conclusion that Davis Road will need widening before 2015. According to that paper, Fort Ord development would be responsible for about 60% of the cost of that improvement. That comment and the mitigation measure must be incorporated into the FEIR or revised DEIR.

The DEIR and the Reuse Plan should require that circulation infrastructure be provided concurrent with development impacts. This will provide Fort Ord and surrounding communities with assurance that appropriate Level of Service standards will be maintained while development occurs.

The FEIR or revised DEIR should more fully examine the feasibility of alternative transportation modes for both on- and off-site development including expanded use of carpools, vanpools, transit service, telecommuting, bicycling and walking to reduce project and cumulative traffic impacts expected from development. The Reuse Plan and the DEIR take a "business as usual" approach to traffic demand accepting the current mode split favoring single occupant vehicles as a given for

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the future. Project and cumulative traffic impacts can be significantly reduced through a comprehensive traffic demand management program.

3

The FEIR or a revised DEIR should contain a series of scenarios with different mixes of conventional and alternative transportation modes including the following:

4

- A "status quo" scenario which assumes the region's current high percentage of trips are made by single occupant vehicle trips.
- A "moderate change" scenario which evaluates the impact on required road improvements of transferring 10% of current and anticipated single occupant vehicle trips to alternative modes.
- A "major change" scenario which evaluates the impact on required road improvements of transferring 20% of the current and anticipated single occupant vehicle trips to alternative modes.

Water Use/Supply

5

The FEIR or a revised DEIR should evaluate a scenario which identifies the level of development possible from on-site wells without aggravating the rate of seawater intrusion as required by the MOU between Fort Ord Reuse Authority (FORA) and the Monterey County Water Resources Agency (MCWRA). This scenario was requested in our Notice of Preparation comments but it hasn't been addressed.

A second scenario would involve the 2015 development of the site utilizing 6,469 acre feet of water annually. This scenario should evaluate the impacts of providing a realistic portion of that water from off-site sources, such as the Salinas Valley Water Transfer Project or the Castroville Seawater Intrusion Project. This information should be available from those project's EIRs.

6

The FEIR or revised DEIR should fully evaluate the water supply alternatives needed to achieve the full development at 18,300 acre feet per year. How would a new water supply be provided? What would be the environmental and economic impacts of desalinization or diversions from other locations?

7

In our comments on the Notice of Preparation, we asked that the DEIR to identify whether the 6,600 acre feet agreed to in the Memorandum of Understanding between FORA and the MCWRA allows water use anywhere on the former fort or only on those portions within the jurisdiction of the MCWRA's Basin Management Plan. That issue was not addressed in the DEIR.

8

Storm Water Runoff

9

In our comments on the Notice of Preparation we asked for the DEIR to quantify the project's expected storm water runoff impacts and propose specific mitigation

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measures to mitigate those impacts to the level of insignificance. Despite the fact that the project proposes to urbanize several thousand acres of land adjacent to a marine sanctuary, the DEIR contains no quantification of runoff impacts. Instead, standard policies and programs are proposed to mitigate these unquantified impacts. How can the DEIR reach the conclusion that these measures can mitigate the impact without some quantification of the potential runoff from these lands?

9

Water quality will be degraded as a result of contaminated urban runoff. Rather than adopting site specific mitigation measures, the DEIR directs the City/County to "develop and make available a description of feasible and measures and site drainage designs that could be implemented in new development to minimize water quality impacts". This statement is so qualified that it provides no assurance that acceptable water quality standards will be maintained with new development.

10

The City of Salinas raised several critical environmental issues in our February 6th comment letter on the Notice of Preparation for this DEIR which either have not been responded to at all or have been responded to inadequately. Given the project's magnitude and the potential for significant environmental harm, the City requests reconsideration of these issues in a revised Draft EIR.

11

Thank you for the opportunity to review the DEIR. We look forward to seeing these issues addressed in a revised Draft EIR. If you have any questions regarding these comments, please do not hesitate to call Kevin Callahan at 758-7919.

Sincerely,

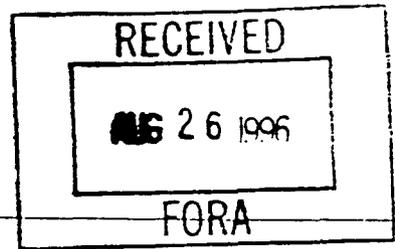


JOHN K. FAIR P.E.
Public Works Director/City Engineer

cc: Mayor Styles
• City Council
Dave Mora, City Manager

Attachments: February 6, 1996 Comment Letter on Notice of Preparation

AUGUST 23RD 1996



TO:

JACK BARRETT, CHAIRMAN OF FORA

THE DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE FORT ORD REUSE PLAN DOES NOT CONTAIN AN ALTERNATIVE SOLUTION, OR SOLUTIONS, TO ADDRESS THE IMPACTS OF INCREASED WATER USE, INCREASED TRAFFIC FLOWS AND INCREASED WASTE-WATER.

THE AGREEMENT WITH THE ARMY AND THE MONTEREY COUNTY WATER RESOURCES AGENCY CONDITIONALLY ALLOCATES 6,400 ACRE FEET TO THE FORT ORD PROPERTY. THE FORA PLAN SUGGESTS A NEED FOR AN ADDITIONAL 11,462 ACRE FEET. THE PLAN ALSO SUGGESTS A MAJOR ROAD SYSTEM THROUGH THE CLENCO FARMING AREA FROM HIGHWAY 101 TO THE FORT ORD PROPERTY.

THE INCREASED WATER USE, INCREASED TRAFFIC, PLUS THE LOSS OF CLENCO FARM GRACIA ARE NOT ACCEPTABLE CONDITIONS OF THE CURRENT D.E.I.R FOR THE FORT ORD REUSE PLAN. THE NEED IS TO REPLACE WHAT WAS LOST, NOT TO MAKE GREATER DEMANDS ON LIMITED RESOURCES.

AS A MONTEREY COUNTY TAXPAYER, FARMER OF CLENCO AREA FARM LAND AND A CONCERNED CITIZEN I CAN NOT ACCEPT THE D.E.I.R FOR THE FORT ORD REUSE PLAN CHANGES WILL HAVE TO BE MADE! 199-1

THANK YOU FOR YOUR ATTENTION

2

Ross Nissen

ROSS NISSEN FARMS

22281 BERRY DR.

SALINAS, CA. 95907

AP#

414-014-017

175-031-010

175-011-028

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AUG 26 1996

COUNCIL MEETING August 28, 1996

AGENDA ITEM B - 1

CITY OF _____

TO: FORA City Council and Planning Commission

FROM: City Manager

DATE: August 22, 1996

SUBJECT: Joint Session on With Planning Commission on Fort Ord Impacts
a. City Council Action

RECOMMENDATION:

That City Council on August 28, take public testimony, discuss the following items with the Planning Commission, and approve them as City of Monterey comments to FORA on the Draft Fort Ord Base Reuse Plan EIR:

- 1. The purpose of an EIR is to facilitate suggestions on how projects can be modified to avoid causing significant environmental impacts. Our review of the Base Reuse Plan EIR is that the Plan, if built out, will cause significant environmental impacts, particularly in terms of traffic generation, water consumption and scenic highway impacts. The City of Monterey's comments focus on those impacts.
2. The City of Monterey has reviewed the EIR project alternatives. In view of the significant environmental impacts caused by the build out of the Plan, we recommend that the Final EIR address a reduced project alternative that reduces density and intensity of development from the buildout Plan to a Plan that can be served by concurrent infrastructure.
3. The Final EIR should recommend the Plan be revised to set a level of economic activity tied to the previous military use of the base. Job replacement should be set at only replacing the 18,227 jobs that were at Fort Ord and a level of economic activity lost due to the closure of Fort Ord. The rate of development should largely be tied to its ability to fund infrastructure costs and minimize environmental impacts, particularly traffic and water impacts on the Monterey Peninsula.
4. The Final EIR should recommend the Plan be revised to set a year 2015 population level at approximately 31,500 people (including CSUMB students), the same population that was on the base when Fort Ord was a full military installation.
5. The Final EIR should recommend that the assumptions for implementing Fort Ord infrastructure improvements be clearly

listed in the Final Plan.

6. The Final EIR should recommend that the Final Plan include a policy that infrastructure funding mechanisms will be provided concurrently with development so that infrastructure impacts will be mitigated prior to or at the same time as land use development. 5
7. The Final EIR should recommend that the Final Plan include a program to develop funding mechanisms treating base wide infrastructure (transportation, water, sewer, drainage) projects as single projects to mitigate impacts. 6
8. The Final EIR should recommend that the Final Plan include a policy requiring each on base jurisdiction to develop more detailed allocations of infrastructure costs for each planning area and then require coordinated infrastructure development programs per planning area linked to base wide infrastructure. 7
9. The Final EIR should recommend that the Final Plan include a program managing traffic related to available capacity of roads and transit systems. Based on traffic analysis in future project EIRs, if roads and transit systems capacity is exceeded, additional capacity would be funded, or the project denied or the Final Plan revised. 8
10. The Final EIR should recommend that the Final Plan include a program identifying how transit service to Fort Ord will be funded. 9
11. The Final EIR should recommend that the Final Plan include FORA's policy for paying its fair share of regional highway expansion, including State Highways 1, 101, 68 & 56. 10
12. The Final EIR should recommend that the Final Plan include a policy that the ultimate development pattern at Fort Ord reflect AMBAG's "Liveable Communities Initiative". 11
13. The Final EIR should recommend that the Final Plan include a water allocation and monitoring program for 6,600 Acre Feet of water supply. If planned sites or opportunity sites exceed the water allocated, reconsideration of Plan densities/intensities should be reconsidered at that time. 12
14. The Final EIR should recommend that the Final Plan include a policy that new water supply sources include not just desalination facilities but recharge ponds, on-site storage facilities and any other feasible water technology that becomes available during the life of the Plan. 13
15. The Final EIR should recommend a program requiring on base 14

jurisdictions to adopt specific design guidelines for development affecting the Highway 1 and Highway 68 scenic corridors.

15

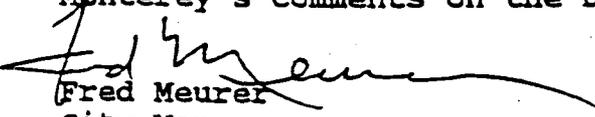
16. The Final EIR should address concerns raised on the enforceability of Plan policies and programs by clearly stating the FORA appeals procedure and plan compliance procedure. The City of Monterey recommends that projects must be found to be consistent with the timing of infrastructure similar to a planning process used by the State of Florida.

16

17. The Final EIR should recommend a program that FORA will monitor and annually review its Plan implementation particularly its Capital Improvement Program. The program should also ensure that the Plan is regularly updated (at least every 5 years) to facilitate coordinated regional planning.

17

On August 22, FORA Board extended the EIR comment period to October 11, 1996. Staff recommends that on August 28, City Council take public testimony, discuss the items above with the Planning Commission and approve comments for submission to FORA. City Council's comments will be sent to FORA at this time. Unless new information is presented, this will complete City of Monterey's comments on the Draft EIR.


Fred Meurer
City Manager

FM/BF/pk

cc: Les White, Executive Director, FORA,
100 12th Street, Bldg. 2880, Marina, CA 93933
All Neighborhood Associations
All Business Associations
League of Women Voters, Monterey Peninsula Chapter,
Jean Esary, 4078 El Bosque Drive, Pebble Beach, CA 93953
Sierra Club, Ventana Chapter, Janie Figen,
1443 Deer Flat Road, Monterey, CA 93940
California Native Plant Society, Mary Ann Matthews,
P.O. Box 381, Carmel Valley, CA 93924

RECEIVED

AUG 26 1996

FORA

LEO D TANCOS

8/20/96

Fora

100 - 12th St

Bldg 2880

Marina 93933

re the Fort Ord DeIR
letter Herald 8/5/96

These people dream a lot.
 If there was any common sense
 to be used on this peninsula
 this is where it should be used.
 If they had a mind at all it certainly
 is not being used - total nonsense!

Leo Tancos

Fort Ord Reuse Authority
100 12th. Street Building 2880
Marina, CA 93933

Are there combat veterans represented on the Board? Is the Board taking the idea of a resting place for the warriors who spilled their blood for this nation too lightly? Those of us who did deserve another National Cemetery near the home we left to protect. Why not at Fort Ord?? We Americans bought and paid for the ground!

In the words of President Theodore Roosevelt, 1902, as he spoke at Arlington:

"A man who is good enough to shed his blood for his country is good enough to be given a square deal afterward....."

My sources tell me that the cemetery at the Presidio in San Francisco and San Bruno are full. Someone recently questioned whether Santa Nella was a fitting resting place for our veterans. (?) Leon Panetta said "the Monterey Peninsula is the most beautiful place in this country". What a tribute a cemetery "in the most beautiful place in this country" would be for our veterans!

Take a trip down memory lane for a moment.....perhaps through Arlington and see the graves; walk along the Wall at Washington, D. C. and witness the mourning; remember Okinawa, Normandy, Viet Nam, Korea and the brave men and women who died for us;

I submitted a question to the President when he was in Salinas. "Would you consider the possibility of a National Cemetery at Fort Ord if there was enough interest in one?" Mister President, there is enough interest in one. At this writing over 500 citizens including veterans and families of veterans, as proved by their signatures, are asking you to give this issue the



OFFICE OF THE CITY MANAGER
440 Harcourt Avenue
Seaside, CA 93955-0810

Telephone (408) 899-6200
FAX (408) 899-6227
TDD (408) 899-6207

August 26, 1996



Les White, Executive Officer
Fort Ord Reuse Authority
100 12th Street, Building 2880
Marina, CA 93933

RE: Comments Regarding Base Reuse Plan and Business and Operations Plan

Dear Mr. White:

The City of Seaside offers the following comments in response to your memorandum of August 16, 1996 to the Administrative Committee. The comments are comprehensive, addressing the primary areas of concern to the City which have been identified in the Business and Operations Plan, as well as in the other volumes of the Base Reuse Plan.

A. Conceptual Areas

1. Identity of Fort Ord Development

Throughout the documents there are many references to establishing a single location name for Fort Ord properties, an overall vision and unique identity for the area. The community form is proposed to be well defined and discernable. And, while development is "related and connected to the adjacent cities," the former Fort Ord is to have its own "distinct character consisting of definable edges, entries and structure" (Volume 1: Context and Framework, pages 3-9). It is unclear how these statements are compatible with the design objective which aims to link new neighborhoods with the surrounding cities' development fabric. The document's use of the word "seamless" (Volume 2: Reuse Plan Elements, pages 4-2) appears to relate more to intra-Fort, rather than to inter-Fort development.

We would like to see the document more clearly recognize the City of Seaside's intent to integrate, to the greatest extent possible, any new development into the fabric of the existing community and to maintain Seaside's integrity as a unique community on the Peninsula. It is hoped that any urban design guidelines and community design standards developed by FORA will give appropriate consideration to this position.

attention it rightly warrants.

I pray he is considering it. Hopefully, a letter will be forthcoming.

Peter Leonardich

Peter Leonardich

44 Madonna Dr.

Salinas, CA 93906

cc: President Bill Clinton
Chief of Staff Leon Panetta

- c. Capital outlay costs, operation, maintenance and personnel costs for non-base-wide capital improvements.

This table also assumes that CSUMB and UCSC will pay their fair share of capital costs; a major assumption which has not yet been confirmed.

Pages 1-26 of the PFIP, Table PFIP 1-3, outlines the various transportation improvement projects which the consultant recommends be paid for by FORA. Some of these projects are intended to serve areas that are regional in scope. The significant issue to be addressed is whether FORA should unilaterally commit to a payment mechanism for non-Fort Ord transportation improvements. We understand that none of the other public or private agencies to benefit from these improvements have made such a commitment to a similar funding mechanism.

3. Land Sale Proceeds

While unclear from our reading of the plan, it appears that the aggregated land sale proceeds in the Base-Wide Pro Forma (Business and Operations Plan, Exhibit 9) incorporate the proceeds from the sale of the proposed hotel site and the Hayes Housing site. These sites will be transferred directly to the City of Seaside through a conveyance made possible by special Congressional legislation, not pursuant to the Pryor Amendment or the provisions of SB899 or SB1600. None of the proceeds of the sale of these sites will be provided to FORA. The Exhibit should be modified to exclude any assumed use of the proceeds of these sites.

Pages III-17 of the Business and Operations Plan should be revised to reflect the fact that the Army will not retain ownership of the golf courses.

C. Planning Issues

1. Level of Specificity in the Base Reuse Plan

We believe the level of specificity dictated by the Base Reuse Plan for incorporation in general plans is inappropriate. For example, issues such as lot size (Table 3.4-1 Volume 1: Context and Framework) are more appropriately addressed in zoning and subdivision ordinances.

Additionally, the City seeks to preserve flexibility for development within its borders and the ability to respond to and capitalize on opportunities as they arise. An example of such flexibility is shown on pages 3-126 of Volume 1: Context and Framework. The text suggests integrating new residential development within the

2. Role of FORA

The City of Seaside supports a limited role for FORA in the development process from initial marketing through disposition of land. We believe FORA's role in the marketing of Fort Ord should focus on the promotion of the Fort communities, in general, as desirable locations for development. We also support the current Board policy precluding FORA's involvement in the conveyance of specific sites to the private sector and strongly object to the setting of basic business parameters for specific development projects. It is the local jurisdiction which has ultimate accountability regarding the legal and liability requirements of land disposition. If FORA believes assurances are necessary that the structuring of any disposition agreement by the City will recognize and incorporate FORA's goals regarding the amount and timing of the receipt of land use proceeds, perhaps a method other than the placing of constraints on the on terms of agreements could be identified.

While respecting the provisions of the reuse plan regarding land uses and densities, in general, the City seeks to preserve autonomy and flexibility in the control of development within its borders.

B. Cost Issues

1. The implementation of planning requirements, such as amending the City's General Plan and zoning code, preparing other plans and specific design guidelines for Seaside development on Fort Ord will be burdensome given existing staffing patterns and the cost of additional staff or consultant services. Many of these costs must be incurred immediately. We believe this issue and the subsequent issue of sources of financing for certain capital and operations costs must be addressed.

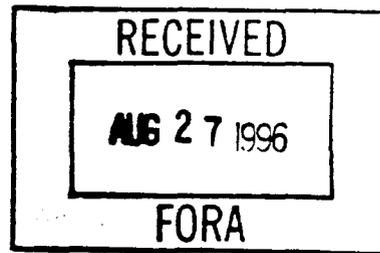
2. Capital and Operations Costs

Pages 2-23 of the Public Facilities Implementation Plan (PFIP), Set-3 Summary Cost Screen for all Capital Improvements (Phase 1-2015), summarizes base-wide capital costs. However, it is incomplete. It fails to include the following information which is necessary to provide a complete, overall cost analysis and funding alternatives.

- a. Operations and maintenance costs for these capital improvements, plus the associated personnel costs for all of these functions;
- b. Capital outlay costs, operation, maintenance, and personnel costs for police and other municipal services; and

City of Marina

211 HILLCREST AVENUE
MARINA, CA 93933
TELEPHONE (408) 384-3715
FAX (408) 384-0425



OFFICE OF THE MAYOR

August 22, 1996

Mr. Jack Barlich, Chairman
Fort Ord Reuse Authority
100 12th Street, Building 2880
Marina, CA 93933

Dear Chairman Barlich:

SUBJECT: COMMENTS ON DRAFT FORT ORD REUSE PLAN AND DRAFT ENVIRONMENTAL IMPACT REPORT

The City of Marina has participated with the Fort Ord Reuse Authority (FORA) during your preparation of the Draft Fort Ord Reuse Plan (Plan) and the Draft Environmental Impact Report (DEIR) prepared for the Plan. The basic outlines of this Plan within Marina are a direct outgrowth of past planning the City and others have conducted for Marina's portion of the former Fort Ord and Marina's review has found that the Plan is largely consistent with Marina's prior planning on the former base. Clearly, the Plan and DEIR represent a monumental effort by FORA, its member agencies and their communities. They are extensive and complicated documents which, with some modifications, should be able to serve well for many years to come the communities represented by FORA. The City of Marina and our community generally support the Plan and EIR. However, given the extensive scope and detail of the documents, they do need some modifications to adequately respond to the needs of Marina and our community. We encourage FORA to incorporate the modifications suggested by the comments below, consider all the other public comments you are now receiving, further revise the documents as necessary, and then act upon them in an expeditious manner so Marina and other communities affected by the FORA Plan and EIR can get on with our recovery from the closure of the former Fort Ord and the reuse of the major resources offered by the closed base.

Given the above, the City of Marina is pleased to submit the following comments on the Plan and the DEIR prepared for the Plan. These comments were developed during a joint meeting of the Marina City Council and Planning Commission following a presentation on the Plan and DEIR by your Staff. We appreciate your Staff's illuminating presentation and responses to questions raised by the Council, Commission and members of the public at the meeting. City Staff may

existing golf course area to optimize the benefit of the amenity regarding the new community. This statement is not consistent relative to the latitude afforded in the land use plan, but is an example of the more liberal portrayal of development which Seaside intends to pursue.

2. Bostrom Park

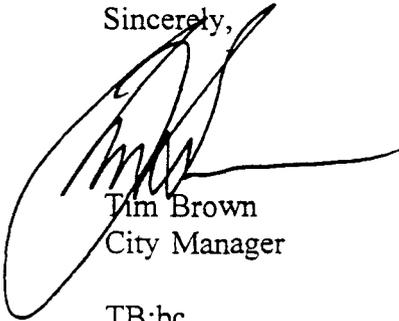
Bostrom Park, a part of the new golf course community in the Seaside Residential Planning Area, is designated as high density residential. Pages 3-125 of Volume 1: Context and Framework discusses the entire new golf course community, including the 24-acre, 291 unit Sun Bay Apartments. While Brostrom Park is designated as high density residential on Table 3.9.1 (Land Development Intensity Summary) in that document, the development capacity for high density residential is projected at 24 acres and 291 units. We wish to confirm that high density development on the remainder of polygon 20g is not constrained by the projected development capacity. Rather, it is our understanding that additional development there would be limited by the cumulative allowable number of dwelling units.

3. Preparation of Design Guidelines

In addition to our comments in Section A.1 regarding design guidelines, we believe that the City should play more than a supporting role in their development (pages 4-56 of Volume 2: Reuse Plan Elements), particularly regarding Community Design Guidelines. We would suggest that this become a joint effort of the directly affected jurisdictions.

We appreciate your attention to these more important issues.

Sincerely,



Tim Brown
City Manager

TB:bc

follow this letter with a supplemental letter on more detailed aspects of the Plan and DEIR within the comment period.

1. FORA may partially respond to criticisms from the public about growth associated with the Plan by indicating that, given the huge loss of population from the former base during its closure, the real rate of population growth on the former base from the most recent census (1990) through the year 2015 is near zero. Additionally, the former Fort Ord provides the best opportunity to accommodate the Monterey Peninsula's share of California growth over the next 50 years and it can be reasonably argued that if growth is severely restricted on the former Fort Ord, the pressures for growth will fall more upon communities west of the former Fort Ord which may not favor this growth within their communities. 1

2. It is very important that FORA not retreat from the 50 year Plan and DEIR horizon back to only a 20 year horizon. If the time horizon were reduced from 50 to 20 years and the buildout projections were not changed, this would probably be unrealistic from a market standpoint and it would increase the annual growth rate of the plan by 250%. Such an increase in annual growth rate would unnecessarily provide fuel to the fire of opponents of the Plan in general. There would then also be arguments to cut out 60% (or more) of the development and redevelopment opportunities now found in the buildout scenario in order to reduce the growth rate back down. If this latter path were to then be chosen, the Plan would end up with numerous white holes where development opportunities would no longer be available. Not only would this critically limit flexibility for development and redevelopment, it would be fundamentally flawed planning to ignore such a possible 60% of the reasonable long term development opportunities on the former Fort Ord. Ultimate development would be made more expensive in the long run if infrastructure were to then be downsized for only the 20 year period, thus requiring very expensive upgrades and/or reconstruction in the future to add back an increment of capacity which could have been much more cheaply provided at the time the 20 year capacity would have been installed. Lastly, such a retreat to a 20 year time horizon would require an expensive and time consuming redrafting of the Plan and DEIR and thereby further delay FORA's proposed economic development conveyance and many other aspects of actually implementing any reuse. 2

3. The City Council has determined that the costs of providing municipal services on the former Fort Ord will lead to unavoidable environmental impacts due to the inability to provide services within the portions of Marina either inside or outside the former Fort Ord at an adequate level to maintain the community's norms of service provision and/or other environmental factors. 3

4. The Plan should provide better opportunities for lower density single family residential development in Marina's portion of the former Fort Ord. 4

5. Generally speaking, programs in the Plan are too restrictive, too precise, and not general and flexible enough. The acreages of uses identified for each planning area are particularly too precise and could severely limit future flexibility which may be necessary. 5
6. The percentage of multi-family residential units allowed within the "Medium Density Residential (SFD)" land use designation needs to be substantially increased or some other adjustment in Table 3.4-1 or the designation for the existing family housing in the Marina "Planned Residential District" (Polygon 4) needs to be made to avoid making the great majority of the 1,522 existing units in this district non-conforming since almost all of them are attached units and the draft Medium Density Residential (SFD) designation allows no more than 25% of the units within an area with this designation to be attached housing. 6
7. The Blanco Road extension from Reservation Road to Imjin Road is required to be built on an earlier schedule no later than the year 2005, so as to avoid congested conditions at the intersection of Reservation Road and Imjin Road. It is believed that the traffic model does not properly project the traffic turning movements at Blanco and Reservation Roads since the projected volumes were less than experienced when Fort Ord was operating. The great majority of traffic emanating from Salinas via Blanco Road would have to turn left at Reservation Road. Additionally, the development of the MBEST/Airport property is believed to have been estimated to be much later than will actually happen. The development of more than six million square feet of MBEST/Airport property is planned and a minimum of a third of that development is planned prior to the year 2005. These developments will further dictate the need for the Blanco Road extension cited. 7
8. Marina's Zoning Ordinance requires Design Review Approval for all multi-family residential and all non-residential development. Pursuant to an adopted resolution of the Planning Commission, Design Review Approval is also always added as a condition of approval of all subdivisions of five or more lots. Such Design Review Approvals are formally considered by the Marina Planning Commission upon recommendations of a Site and Architectural Design Review Board which is composed principally of design and landscape professionals. This process is in place to ensure quality design and development in Marina, including Marina's portion of the former Fort Ord. Marina contends that our existing ordinances and processes are adequate to ensure quality design on Marina's portion of the former Fort Ord. However, should FORA choose to adopt design guidelines concurrent with or following adoption of the Plan, any such guidelines must provide for flexibility in the City's administration of them in order for redevelopment and development to realistically respond to market opportunities. Marina also needs the local flexibility to build our own character in our own community. Any such possible design guidelines must be textually based instead of graphically based in order to provide such realistically necessary flexibility. 8
9. At the 3/29/96 FORA Board Meeting Board Members Perrine and Johnson commented upon the Administrative Draft Plan's version of the "Community Design Vision" with 9

concern that it stressed a few key principles including principles which emphasized distinguishing the former Fort Ord as a "new community" separate from the existing cities of Marina and Seaside which include the great bulk of near term development areas. City Staff acknowledged soon thereafter that in Administrative Draft Section 3.1.2 "Design Objectives" there were a few references to linkages and connections of "the new community" with the civilian portions of Marina and Seaside. However, integration of the portions of the former Fort Ord within the Cities of Marina and Seaside with the civilian areas of Marina and Seaside still needs to be promoted to be among the fundamental organizing principles in the statement of the "Community Design Vision" instead of relegating the civilian portions of Marina and Seaside to just connections and linkages. The former Fort Ord is no longer an entity but instead it now composes parts of Marina, Seaside and Monterey County. This needs to be a more fundamental organizing principle than the creation of some artificial "new community" within the boundaries of the former base. There is no "new community" and references to such should be removed entirely from the documents. To the extent the "Design Vision" is founded upon a "new community", it is fundamentally in error.

10. The Draft Plan is overly ambitious in terms of the extensiveness of its goals and policies. For example, these goals and policies appear a) to call for the City to carry out many follow-up projects which could be expensive and/or conflict with other high City priorities, b) they may provide very fertile ground for anyone who might want to take pot shots at future development on Fort Ord by saying that a particular project does not comply with this or that policy, and c) that by being so extensive in its policies and programs, the Plan could severely constrain the flexibility that the market and the realities of redevelopment may demand.
11. There has been little direct community input into the preparation of the Plan. Given this and the fact that the City is now embarking upon a comprehensive update of the General Plan for the entire City, it is very important the Plan and the FORA Board provide adequate flexibility for the City to revisit the many goals and policies of the Plan during our General Plan process so that we may tailor the overall set to more closely reflect the needs and desires of the Marina community which become articulated through our General Plan update process.
12. Page 3-109 (and elsewhere) -- In the overwhelming number of situations in the Plan where there are acreage or square footage projections for a series of component land uses within any one area or district (such as the mixed use district adjoining Highway 1) please clarify in the text 1) that projections of component land uses (eg. 326,000 square feet for regional retail) within a larger overall amount of square footage are not controlling numbers, and 2) that there is flexibility to shift development between the various component use projections. For example, if there is demand and a real project proposed for 500,000 square feet of regional retail instead of the projected 326,000 square feet it will be important to indicate that the Reuse Plan incorporates the flexibility to shift some square

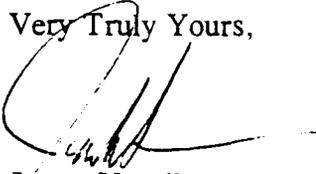
- footage out of another component (such as the 818,405 project for office and research and development land uses) and into the component where the current projection turns out to be too low. Although Table 3.8-1 has a note at the top which is responsive to this concern, the problem must also be addressed in the text which has more weight as policy than does a table. 12
13. Many of the policies in the Plan might be great ideas from the standpoints of professional planning and theory and they might work very well if they fit the reality of the market and economic forces which fundamentally drive development. However, if they turn out to be unrealistic and utopian, they will limit our flexibility to where it may be difficult to allow development of what the market reality and economic forces demand, thereby impeding economic development and reuse. It is extremely important that the final Reuse Plan incorporate flexibility to respond to the changing needs of reality that can only become evident as the future unfolds. We do not see this flexibility in the draft Plan and unless FORA is clear that the Plan is to be interpreted with flexibility, it may become more of an impediment to quality development than a help because it may impede much of any substantial development at all if each significant development needs to go through a long process to change or clarify one or two policies in the Plan which might be at issue for any particular development. 13
14. AMBAG's "Livable Communities Initiative" needs to be recognized as a reference document and should not be considered as a policy document constraining the Plan. 14
15. The map and textual description for Polygon 2b needs to recognize the 20 acre recreational conveyance which the City will be receiving adjoining 2nd Avenue south and slightly north of 8th Street. 15
16. The City takes exception to a number of the policies in the Recreation element, partially because they are far too rigid and do not provide the type of flexibility which we have so strongly advocated above. One prime example which we disagree with is Policy A-2 as it is now written. At the very least this policy should be softened to read "The City of Marina shall consider supporting the development of a regional Visitor Center/Historical Museum complex..." This concept may warrant consideration but it far too early to determine that it be an absolute mandate. 16
17. The Plan should further address the need for improvement to Highway 1. 17
18. Given the concern expressed in comment number 3. above, the DEIR should respond to the possibility of the City of Marina not providing public safety services at the former Fort Ord and then analyze the potential impacts of such a possibility. 18
19. In addition to the Plan's discussion on the "Community Design Vision", there is also mention of "Gateways" being provided, particularly in landscaping themes. While the 19

- underlying concept of aesthetic landscape character is meritorious, the context of gateways promotes the image and mind set of a "new community". The notion that a "gateway" is warranted, suggests that there is a need to separate and distinguish from the adjacent. The landscape features should be more generally stated as beneficial throughout the community and for inclusion whenever possible between land use types, within larger expanses of the same land use, etc. The specific level and detail of such landscape relief should be flexible. If this flexibility is not incorporated, then the environmental impacts of the economic viability of installation and maintenance of specific features needs to be analyzed. 19
20. Please clarify in Table 2.2-1 (page 2-11) the accounting of the unincorporated population of the Monterey Peninsula. Pebble Beach and the unincorporated areas surrounding Carmel contain a significant population which should be considered a part of the Monterey Peninsula. 20
 21. The Marina Town Center Illustrative provided on page 3-14 is not representative of any recognized planning process. 21
 22. The Draft Regional Landuse Context provided by Figure 3.2-3 (page 3-25) and the Draft Proposed Landuse Context provided by Figure 3.2-3 (page 3-47) misrepresent land uses within Marina. The Armstrong Ranch is shown as residential, with a business park on the west side of Highway 1; business park indicated on Beach Road where Olson School exists; commercial center indicated on Del Monte where Vince DiMaggio Park exists; vernal pond along Robin Drive not indicated, etc. These errors need to be corrected. 22
 23. Is there any discussion provided relative to a comparison between the vehicle trips when the lands were used by the Army, prior to 1991, compared to reuse? 23
 24. On page 3-79 (fourth paragraph) and page 3-83 (second paragraph), the existing jurisdictional boundaries of Marina and Seaside are misstated. 24
 25. Is the illustration of the entire polygon 2A as a Habitat Reserve or Corridor correct on Figure 3.6-2 (page 3-87)? 25
 26. On page 4-123, Table 4.3-1, footnote (2) should be corrected to reflect a 1983 Marina General Plan. 26
 27. In the discussion of parks, and particularly in Table 4.3-3 (page 4-127) the definition of Community park and neighborhood park needs further clarification. The 27+ acre park in polygon 4 and the 20 acre park in polygon 2B will likely highlight service to the regional community with neighborhood amenities. 27

The City looks forward to working with the FORA Board. Staff and consultants during their

consideration of and response to the concerns expressed in this letter in the hopes that FORA will arrive at a final Plan and EIR which can receive the full support of the City. You or your Staff should feel free to contact me, City Manger John Longley, or Planning Director Jeff Dack during the Plan and DEIR revision which we anticipate that FORA will prepare in response to the concerns in this letter and any subsequent letters and oral comments which may submitted by the City regarding the Plan and DEIR. On behalf of the Marina City Council I am:

Very Truly Yours,



James Vocelka
Mayor

cc: Les White, FORA
Ann Hebenstreit, FORA
Mike Groves, EMC Planning
City Council
City Manager
Planning Director

foplan6.ltr



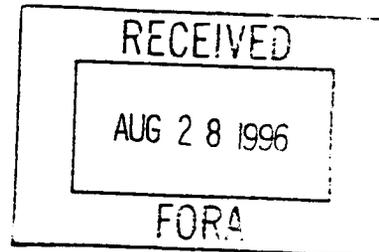
Fort Ord Reuse Authority

DRAFT FORT ORD REUSE PLAN/EIR COMMENTS FORM

If you use this form to submit your comments, it is important that you include your name, address, and phone number below. You can use this form to submit your comments, or you can mail or fax your written comments directly to FORA. Your comments must be received no later than 5:00pm on Friday, August 30, 1996 unless otherwise announced.

Comments should be directed to:

Fort Ord Reuse Authority
100 12th Street Building 2880
Marina, CA 93933
Phone: (408) 883-3672 Fax: (408) 883-3675



PLEASE PRINT THE FOLLOWING INFORMATION:

Name: F. C. EUBANKS JR.
Address: 1733 MENDOCINO
City: SEASIDE, CAL. Zip: 93455 Phone: 394-1227

COMMENTS: (please also use the back of this sheet or attach additional sheets if needed).

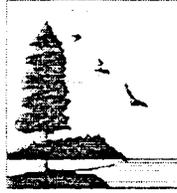
FIRST - I THANK THE BOARD SHOULD REVIEW THE DRAFT REPORT. BUT I DONT BELIEVE WILL EVER GET THE PUBLIC TO APPROVE ANY ENVIRONMENTAL FOR FORT ORD SO I SAY DONT TRY TO PLEASE EVERY BODY FROM MONTEREY, KING CITY, CARMEL, SALINAS PACIFIC GROVE, PEBBLE BEACH AND SEASIDE. THE OUTLYING CITIES HAVE DIFFERENT ECONOMIC NEEDS THAN SEASIDE & MARINA AND WILL NEVER AGREE TO ANY PLAN THAT WILL UP SET THEIR STATUS

SECONDLY, AS A CITIZEN OF SEASIDE I THINK THE BOARD IS DOING A GOOD JOB BUT BUT IT IS TAKING TO LONG TO ARRIVE AT A WORKABLE PLAN. PLEASE KEEP IN MIND THAT FORT ORD HAD OVER 45,000 POPULATION PLUS A HOSPITAL W/ CIVILIAN EMPLOYEES AND TWO PROFESSIONAL GOLF COURSES AND NO WATER PROBLEM.

THIRD I HOPE YOU GET ON WITH THE PROBLEM OF DISTRIBUTION OF PROPERTY LAND TRANSFER. SO THE THE PROPERTY CAN BE PROPERLY MAINTAINED THEIR RESPECTIVE LEAS.

FRANK C EUBANKS JR

CALIFORNIA STATE LANDS COMMISSION
 100 Howe Avenue, Suite 100 South
 Sacramento, CA 95825-8202



ROBERT C. HIGHT, Executive Officer
 (916) 574-1800 FAX (916) 574-1810
 California Relay Service From TDD Phone 1-800-735-2922
 from Voice Phone 1-800-735-2929

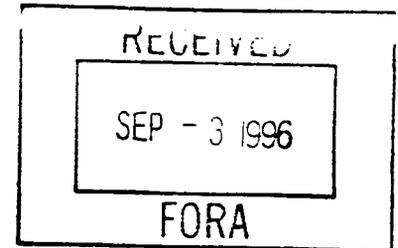
Contact Phone: (916) 574-1858
 Contact FAX: (916) 574-1925

August 29, 1996

File Ref: W25112

Ann Hebenstreit
 Fort Ord Reuse Authority
 100-12th Street
 Building 2880
 Marina, Ca 93933

RE: Fort Ord Reuse Plan; Draft Environmental Impact Report
 (SCH #96013022)



Dear Ms. Hebenstreit:

This is written in response to the Draft Environmental Impact Report (DEIR) for the Fort Ord Reuse Plan. The applicable State Clearinghouse Number is 96013022.

Upon admission to the Union in 1850, California acquired nearly four million acres of sovereign land underlying the State's navigable waterways. Such lands included the beds of more than 120 navigable rivers and sloughs and nearly forty navigable lakes. Concerning Fort Ord, California's sovereign lands also included the three mile wide band of tide and submerged lands adjacent to the coast. These lands are managed by the State Lands Commission (SLC) as lands subject to the public trust.

We have reviewed the DEIR for the Fort Ord Reuse Plan and have the following comments:

1. The State Lands Commission administers the fee interest of California in any tide and submerged lands which lie within the reuse area. These lands, which are subject to the public trust, are required to be used for purposes of commerce, navigation, fisheries, water-dependent recreation, and preservation in their natural state. We are pleased to see that the Plan calls for the beaches and dunes along the ocean to be used for Fort Ord Dunes State Park, for purposes of public access, service to visitors, and habitat preservation. The State Lands Commission would be pleased to consider a lease of properties under its jurisdiction to a public agency for these purposes.

2. We note that unsafe conditions in ocean outfalls and in their support structures should be corrected prior to transfer, if they are to remain. As an alternative, the facilities should

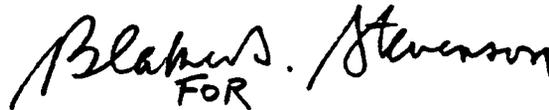
Ann Hebenstreit
August 29, 1996
Page 2

be removed if the Department of Parks and Recreation and local communities implement plans for stormwater disposal which terminate discharge into the ocean. In this regard, please see page 58 of the Preliminary General Plan for Fort Ord Dunes State Park. 2

3. We note that transfer of properties will be preceded by complete remediation for hazardous substances. 3

Thank you for the opportunity to comment.

Sincerely,



FOR
David E. Plummer
Public Land Manager

cc: Robert Ueltzen
Department of Parks and Recreation
Sacramento



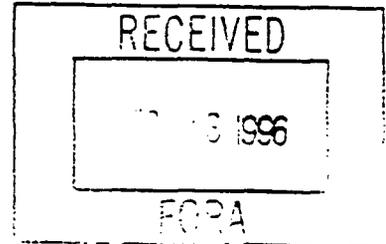
DEPARTMENT OF THE ARMY

HEADQUARTERS UNITED STATES ARMY TRAINING AND DOCTRINE COMMAND
FORT MONROE, VIRGINIA 23651-5000

August 27, 1996

REPLY TO
ATTENTION OF

Base Realignment and
Closure Office



Mr. Les White, Executive Officer
Fort Ord Reuse Authority
Building T2880, 100 12th Street
Marina, California 93933

Dear Mr. White:

This letter forwards comments provided by the U.S. Army Corps of Engineers, Construction Engineering Research Laboratories (CERL), regarding former Fort Ord reuse transportation infrastructure issues. These comments are a result of CERL's review of Volumes 1 and 2 of the Fort Ord Reuse Authority's Base Reuse Plan (Administrative Draft, March and May 1996 versions); Appendix B, Business and Operations Plan, of the Reuse Plan (Public Draft, May 1996); and the Fort Ord Infrastructure Study (FORIS). While CERL's comments are in support of Sacramento District, they are being provided for your consideration. We considered them to be germane to both your current EIR/Reuse Plan as well as your Economic Development Conveyance (EDC) submission.

In reviewing the transportation infrastructure and related projects, CERL found inconsistencies from the FORIS Report to the Reuse Plan and from the Reuse Plan to the Business Plan. CERL estimates that approximately \$25 million in transportation improvement project costs (to be financed by FORA) are contained in the Business Plan that are unaccounted for in the Reuse Plan.

In their forwarding memorandum provided to this command, CERL recommended that FORA "resolve the inconsistency in advance of their EDC application, as well as provide clarification for apparent overlapping and difficult to interpret elements of their transportation infrastructure improvements plan." We support this recommendation.

If you have questions related to CERL's comments, please do not hesitate to contact Mr. Ken Fox, Sacramento District Corps of Engineers, (916) 557-6870.

Sincerely,


TIMOTHY C. BAKER
Lieutenant Colonel, U.S. Army
Director, Operations

Enclosure

207-1

Copy Furnished:

Commander,

Defense Language Institute, Foreign Language Center and Presidio
of Monterey, ATTN: ATZP-GC (COL Ila Mettee-McCutchon/ATZP-BR
(Mr. Adrian Nakayama))

U.S. Army Corps of Engineers, Sacramento District,

ATTN: CESPk-PM-M (CPT David LaBranche)/CESPK-RE (Mr. Ken Fox)

U.S. Army Corps of Engineers, Construction Engineering Research
Laboratories, ATTN: Mr. Dennis McConaha

Mr. Jack Barlich, Chair, Fort Ord Reuse Authority

***CERL Comments:
Fort Ord Transportation Reconciliation***

- CERL compared the proposed improvements contained in the May 1996 Fort Ord Reuse Plan, *Appendix B: Business and Operations Plan* (hereupon referred to as the "Business Plan") and May 1996 Fort Ord Reuse Plan, *Volume 2: Reuse Plan Elements* (hereupon referred to as the "Reuse Plan"). Proposed improvements contained in the November 1994 FORIS (Fort Ord Reuse Infrastructure-Study) report were disregarded in the final analysis due to the preliminary guidance role of the document and the fact that it was not adopted as a public advisory plan.
- The May 1996 Vol. 1 Reuse Plan states that, "for the most part, the proposed regional improvements are consistent with those included in the FORIS project" (p. 3-64). It is the finding of CERL that the elements contained in the FORIS report and Reuse Plan differ substantially in some cases, both in terms of location and type of improvement. This also holds true when the costs and elements of the Business Plan are compared to the FORIS report.
- CERL takes exception to the notable differences between the transportation elements contained in the Reuse Plan which guides development and the Business Plan which implements and finances it. These two documents are in fact components of the same plan, and as such, should be internally consistent (a reconciliation sheet outlining these differences is attached). These inconsistencies must be rectified prior to, or addressed contemporaneously with the EDC application.
- The Reuse Plan contains regional transportation network improvements that are contained in the Business Plan. However, it is unclear from the Reuse Plan if FORA is programmed to pay a prorated share of capital improvement cost in contrast to the Business Plan where a percentage nexus test is employed. This also holds true for some off- and on-site improvements. This issue is further complicated by the fact that, "each jurisdiction shall design and construct the roadway consistent with the phasing program identified in the Fort Ord Business and Operations Plan." (p. 4-105, May 1996 Vol. 2 Reuse Plan).
- An illustrative example of inconsistencies between documents and difficult to interpret elements within each is as follows: The Reuse Plan articulates a strategy to "reduce" demand along 12th St/Imjin and "de-emphasize" Intergarrison Rd/8th St as a "major vehicular route" (p. 3-48, Vol. 1). According to this Reuse Plan strategy, the campus area and major redevelopment parcels would, in effect, be restricted from efficient access. Access along this critical east-west corridor would depend on the Multimodal Corridor which has only been agreed to in concept. Moreover, this strategy appears to contradict that of the Business Plan which programs upgrades to 4- and 2-lane arterials respectively.

CERL Action Item

Due to the observed inconsistencies between the Reuse Plan and Business Plan, and the presence of apparent overlapping and difficult to interpret elements within each individual document, CERL recommends that the LRA advance a single "preferred" transportation plan that is internally consistent and provides ample economic justification for proposed improvements. A single "preferred" transportation plan will not only expedite the Army's evaluation of the Reuse Plan and forthcoming EDC application, but will also mitigate misunderstandings and misguided expectations of FORA's members and the regional community as a whole.

Transportation Reconciliation Sheet

The attached reconciliation report is organized in the following way:

1. all roads contained in either the Business Plan or Reuse Plan are contained in the first column;
2. Business Plan project identification numbers are in the second column and correspond to the roads on which improvements are proposed;
3. the third column contains the calculated percentage cost of each improvement attributable to FORA as set out in the Business Plan;
4. the fifth column contains the total cost of a proposed improvement contained in the Business Plan;
5. the sixth column contains Reuse Plan descriptions of improvements that best align those contained in the Business Plan;
6. the last column contains USACERL comments concerning each line item.

USACERL aggregated the improvements contained in the Business Plan which were not included in the Reuse Plan and concluded that over \$25,000,000 in proposed improvements to be financed by FORA is apparently unaccounted for in the Reuse Plan. Moreover, when total improvement costs are considered, around \$36,000,000 in improvements is apparently unaccounted for in the Reuse Plan. However, as noted in the reconciliation sheet, some improvements contained in the Reuse Plan are not programmed in the Business Plan which will reduce the apparent financing gap between the two documents.

Fort Ord Transportation Reconciliation

Jul-96

Road	Business Plan	Description	FORA Cost	Total Cost	Reuse Plan Description	Comments
HWY 68	T-1	construct 4 lane by-pass freeway	\$18,050,000	\$177,000,000	construct 4 lane by-pass freeway	existing HWY 68 contains 4 lanes
HWY 156	T-2-r	widen to 4 lane expressway	\$34,000,000	\$50,000,000	widen to 4 lane expressway	Fort Ord cost is now 100% - 156 is 8-9 miles north of Ft Ord Boundary
Buses	T-3	procure 15 buses	\$4,950,000	\$4,950,000	not explicitly included	
US101		construct new freeway - upgrade to 4 lane freeway	not significant		not explicitly included	
HWY 183		widen to 4 lane	not significant		widen to 4 lanes	Reuse Plan makes it unclear if FORA will pay a % or not.
Davis Road	T-4	4 lane bridge-no roadway widening thru 2015	\$2,030,000	\$5,000,000	upgrade road	Justification for bridge upgrade without roadway widening
Blanco Road	T-5.1	widen from 2 to 4 lanes (4500*\$320/LF	\$1,440,000	\$1,440,000	upgrade (4 lanes?) to Davis vs Allisal (BP)	length of improvement differs between plans (Allisal vs. Davis) - .4 mile difference
	T-5.2	widen from 2 to 4 lanes (20,700*\$320) + bridge	\$5,600,000	\$10,930,000	not included	
	T-40	construct new 4 lane arterial (5400*\$755)	\$600,000	\$600,000	not included	
HWY 1			not significant		limited improvements (upgrade to 4 lanes)	Reuse Plan makes it unclear if FORA will pay a % or not.
Reservation Road	T-6	widen from 4 to 6 lanes w/ turning lanes (7000*\$573)	\$2,450,000	\$4,010,000	not included	
	T-7	construct new 4 lane	\$2,800,000	\$3,400,000	not included	

207-5

<i>Road</i>	<i>Business Plan</i>	<i>Description</i>	<i>FORA Cost</i>	<i>Total Cost</i>	<i>Reuse Plan Description</i>	<i>Comments</i>
	T-8	arterial (4500*\$758) construct new 4 lane arterial (3400*\$756) + retaining wall (2300*\$300)	\$3,100,000	\$3,770,000	unknown	
	T-16.1	improvements on existing street intended for reuse			unknown includes upgrade from Davis to Intergarrison	
<i>Del Monte Blvd</i>	T-9	widen to 5 lanes + ROW acquisition	\$2,200,000	\$10,000,000	widen to 6 lanes	where improvements are programmed is unclear
	T-10	widen to 6 lanes (3700* \$499) ROW	\$4,480,000	\$5,570,000	Included (6 lanes?)	length of improvement unclear from Reuse Plan
<i>HWY 218</i>	T-11	widen to 4 lanes (3500* \$600) + ROW	\$1,640,000	\$3,590,000	"Improved"- 4 lanes?	
<i>California AVE</i>	T-12	construct new 2 lane arterial	\$0	\$600,000	not included in narrative but on map?	
	T-13	upgrade & extend as 2 lane arterial (3000*\$320)	\$700,000	\$1,860,000	not included in narrative but on map?	
<i>Crescent Court</i>	T-14	construct new 2 lane arterial	\$720,000	\$720,000	included in Abrams improvements	
<i>various locations</i>	T-15	26 miles of Interim safety & rehab	\$0	\$1,100,000	see individual improvements	
	T-16	improvements on existing street intended for reuse (29 miles) @\$37/LF	\$5,600,000	\$5,600,000	see individual improvements	
	T-17	Interim rehab to arterials to be rebuilt (44000*\$100)	\$3,080,000	\$4,400,000	see individual improvements	
	T-18	construction of new 4 lane divided arterial entrances w/ landscaping & signage	see individual projects		see individual improvements	

207-6

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207-1

Road	Business Plan	Description	FORA Cost	Total Cost	Reuse Plan Description	Comments
Monterey Road	T-16.2	Improvements on existing street intended for reuse	see T-16	NA	not included	Monterey Rd does not connect until North-South
Abrams	T-16.3	Improvements on existing street intended for reuse	see T-16	NA	not included	
	T-39	construct new 2 lane arterial (1000'*\$603)	\$600,000	\$600,000	similar improvement	
					Includes extension along Ft Ord Boundary to CA Ave	not on Reuse Plan map - inconsistent with BP
Intergarrison	T-16.4	Improvements on existing street intended for reuse	see T-16	NA	various improvements	
	T-17.4	Interim rehab of arterials to be built (44000'*\$100)	\$600,000	NA	various improvements	RP wants to de-emphasize - contradicts BP
	T-38	upgrade to 2 lane arterial (14000'*\$320)	\$3,810,000	\$4,480,000	various improvements	Overlaps with project T-16.4
	T-18.5	see T-18 - 1000' realign + signal	\$300,000	\$1,500,000	not included	
8th St	T-16.4	Improvements on existing street intended for reuse	see T-16	NA	various improvements	RP wants to de-emphasize - contradicts BP
	T-21	upgrade as 2 lane arterial (2000'*\$420)	\$710,000	\$840,000	various improvements	
	T-31	construct new 2 lane arterial (3300'*\$603)	\$1,700,000	\$2,000,000	various improvements	RP wants to de-emphasize - contradicts BP
	T-32	upgrade to 2 lane arterial (3100'*\$320)	\$840,000	\$990,000	various improvements	RP wants to de-emphasize - contradicts BP
Parker Flats Rd	T-16.5	Improvements on existing street intended for reuse	see T-16	NA	not included	
Coe	T-16.6	Improvements on existing street intended for reuse	see T-16	NA	not included	
	T-28	upgrade to 2 lane arterial	no improvements proposed		not included	

RECORDS.XLS

Road	Business Plan	Description	FORA Cost	Total Cost	Reuse Plan Description	Comments
Eucalyptus	T-16.6	Improvements on existing street intended for reuse	see T-16	NA	not included	
	T-17.5	Interim rehab	\$900,000	NA	not included	This project is similar to T-16.6
	T-37	upgrade to 2 lane arterial (9900**\$320)	\$2,880,000	\$2,880,000	not included in narrative but on map?	Overlaps completely with T-17.5 & partially with T-16.6
North South Rd	T-16.7	Improvements on existing street intended for reuse	see T-16	NA	part of North-South will be eliminated	overlaps with T-33
	T-17.2	Interim rehab	\$600,000	NA	not included	
	T-18.2	3300' + signal	\$640,000	\$3,200,000	upgrade/improve	Is it 4 lanes in RP?
	T-18.4	1000' + signal	\$240,000	\$1,200,000	not included	overlaps T-34
	T-33	widen to 4 lane arterial (5400**\$588-\$100)	\$1,430,000	\$2,640,000	upgrade/improve	overlap with T-16.7
	T-34	upgrade to 2 lane arterial (11000**\$320)	\$1,900,000	\$3,520,000	part of North-South will be eliminated	overlaps T-18.4 (4lane entrance upgrade)
1st Ave	T-16.8	Improvements on existing street intended for reuse	see T-16	NA	not included	
10th St	T-16.9	Improvements on existing street intended for reuse	see T-16	NA	not included	
3rd Ave	T-16.10	Improvements on existing street intended for reuse	see T-16	NA	not included	
Normandy Rd	T-16.11	Improvements on existing street intended for reuse	see T-16	NA	not included	
8th Ave	T-16.12	Improvements on existing street intended for reuse	see T-16	NA	not included	8th Ave is not perpendicular to 8th St but is to Intergarrison
Col Durham Rd	T-16.13	Improvements on existing street intended for reuse	see T-16	NA	not included	Durham does not connect until North-South. It ends at Malmedy

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Road	Business Plan	Description	FORA Cost	Total Cost	Reuse Plan Description	Comments
Imjin Rd	T-17.1	see T-17	\$550,000	see T-17	Improve?	Imjin does not Intercept California - overlaps with T-26 overlaps T-17.1
	T-18.1	2760'	\$460,000	\$2,300,000		
	T-26	widen to 4 lane arterial (7500'(\$755-\$100))	\$2,460,000	\$4,910,000	Improve?	
2nd Ave	T-17.3	see T-17	\$430,000	see T-17	upgrade/improve	
	T-27	lane arterial (4000*\$755) demolition (87000*\$7)	\$2,790,000	\$ 3,630,000	upgrade/improve	
	T-29	widen to 4 lane arterial (55000*\$755-100)	\$2,600,000	\$ 3,600,000	upgrade/improve	
11th St	T-18.3	see T-18 - 1200'	\$200,000	\$1,000,000	not included	Why not continue 2nd Ave until 12th *** contradicts RP which seeks to reduce demand
12th St	T-18	construct new 4 lane arterial (5500*\$755)	\$2,080,000	\$4,150,000	improve?	
California Ave	T-20	construct new 2 lane arterial (2100*\$603)	\$480,000	\$1,270,000	not included in narrative but on map?	
	T-30	construct new 2 lane arterial (2500*\$603)	\$570,000	\$1,510,000	not included in narrative but on map?	
Gigling Rd.	T-35	construct new 4 lane arterial (4600*\$603)	\$1,970,000	\$2,770,000	upgraded	
	T-23	rebuild as 4 lane arterial (3000*\$588)	\$1,250,000	\$1,760,000	upgraded	
Eastside Rd	T-36	construct new 2 lane arterial (10000*\$603)	\$4,370,000	\$6,030,000	"connection to Gigling Rd."	
Intermodal Center	T-22		\$3,600,000	\$3,600,000	Included in concept	does this include rail Improvements (BP)?
Salinas St	T-24	construct new 2 lane arterial (4000*\$603)	\$2,410,000	\$2,410,000	not included	

207-9

DRAFT FORT ORD REUSE PLAN/EIR COMMENTS FORM

If you use this form to submit your comments, it is important that you include your name, address, and phone number below. You can use this form to submit your comments, or you can mail or fax your written comments directly to FORA. Your comments must be received no later than 5:00pm on Friday, August 30, 1996 unless otherwise announced.

Comments should be directed to:

Fort Ord Reuse Authority
100 12th Street Building 2880
Marina, CA 93933
Phone: (408) 883-3672 Fax: (408) 883-3675

EDWARD A. BOTSFORD

Box 4293
Carmel, CA. 93921-4293

The Honorable Pete Wilson
Governor's Office, Sacramento, CA.
Dear Governor Wilson:

Sept. 3, 1996.

I would like to call your attention to a letter to the editor published in The Monterey County Herald of September 2, 1996, written by Pacific Grove City Councilman, Terrence B. Zito.

ber 2, 1996 County Herald, Monday, September 2, 1996

LETTER BOX

Zito to offer FORA proposal

Editor, The Herald:

The people of the Monterey Peninsula need to become involved in the Fort Ord Reuse Plan process, and there's no time to waste! The plan as currently proposed would replace an Army population of 35,000 with residents and students of over 70,000, 12 million square feet of new industrial parks and offices, 1,800 new hotel rooms, up to six new golf courses and 45,000 jobs.

The potential negative impact of all of this on our environment and way of life staggers the mind! Seventy-thousand people can account for a lot of water consumption, air pollution and traffic con-

gestion.

On Wednesday, I will propose to the Pacific Grove City Council a resolution urging the Fort Ord Reuse Authority (FORA) board to: "Produce a revised Draft Environmental Impact Report that downsizes the proposed development to approximate a replacement of the Army activity, rather than to substantially increase development."

This more modest approach is warranted by the fact that the economies of Seaside and Marina have not experienced the "great distress" that was originally predicted with the closing of the base. This, after all, was the overriding rationale for setting this process in motion in the first place. When we also consider problems of water availability, aging infrastructure, viewshed impacts, traffic and even unexploded ordnance, a scaled-down version of this development is clearly indicated.

I urge citizens to read as many of the reuse documents as possible. The city of Pacific Grove has copies of the plan available at City Hall and the library. Please make your concerns known to your elected representatives, especially Rep. Sam Farr, state Sen. Henry Mello and Assemblyman Bruce McPherson.

Terrence B. Zito,
City Councilman,
Pacific Grove

I wholeheartedly agree with Councilman Zito as do all the concerned residents of the Monterey Peninsula with whom I discussed this subject. Councilman Zito's proposal to downsize the Ford Ord Reuse Authority was also recommended by Salinas' Mayor

I wholeheartedly agree with Councilman Zito as do all the concerned residents of the Monterey Peninsula with whom I have discussed this subject. Councilman Zito's proposal to downsize the Fort Ord Reuse Plan was also recommended by Salinas' Mayor Alan D. Styles in his February 6, 1996 "Letter of Comment" on the Notice of Preparation for Draft EIR on Fort Ord Reuse Plan to the Fort Ord Reuse Authority... which has been ignored by FORA.

For some reason the Fort Ord Reuse Authority seems determined to ignore the will of the vast majority of the residents and voters of the Monterey Peninsula, as expressed by the public at every open meeting held by FORA to date, and by the letters to the editor appearing in The Monterey Herald, The Monterey County Post, The Carmel Pine Cone, etc.

As a constituent and a concerned resident of the Monterey Peninsula I ask that you use your good office to convince the Fort Ord Reuse Authority to prepare a revised draft plan based on the existing water available at Fort Ord, existing sewage treatment facilities and the existing highway system and most important of all a plan designed to protect the existing environment on the Monterey Peninsula.

Thank you,

Edward Botsford
Carmel, CA. 93921-4293
FAX (408) 626-6342

SEP - 5 1996

FORA

Fort Ord Reuse Authority
100 12th St., Bldg. 2880
Marina, CA 93933

1342 Jewell Avenue
Pacific Grove
CA 93950
Sept. 3, 1996

Dear Members:

I'm writing you today regarding my concern with the EIR for Fort Ord reuse, which I believe is deficient in several important ways.

First, it is inadequate in its expression of purpose and goals. The purpose of the projects involved is for reuse of the land and facilities, not for growth. I believe that the majority of the population of the Monterey Peninsula looks forward to maintaining and improving quality of life, not to increasing population growth.

The EIR is based on a projected growth of 34,000. Who wants to see this happen? Developers, big chain merchandisers? Economic growth does not automatically mean improvement of the quality of life, especially if it brings in tens of thousands of people, with the resulting increase in pressure on traffic, housing, schools, infrastructure, and so on.

Where is the necessary information presented regarding present housing, unemployment, and labor skills available? What types of jobs would be involved in the extensive development envisioned? Would they help our present pool of unemployed or underemployed?

Secondly, the EIR addresses major issues involved in reuse in a vague, inexplicit manner. How does the EIR propose to solve the problems involved in wastewater disposal, road expansion, and most important, desalinization or other water source conservation or development?

Each of these areas carries major environmental consequences not addressed in the EIR.

Why is this an "all or nothing" plan? A fully conceptualized EIR would list alternatives, ranging from no development to a reuse plan consistent with environmental protection.

In a project as huge as this, it would seem wise to first survey and/or develop present base-line data on the area, then to project a tiered series of reuse plans, with each tier dependent upon the success or problems encountered along the way.

Consider just a few of the possible side-effects of such a mass development as now envisioned in the plan: air pollution due to the huge increase in vehicles on our roads,

noise pollution in residential areas near those roads and highways, impact on our public beaches and parks, and so on. | 6

And finally and reiteratively, where do we get the water?

Please consider these objections to the EIR and FORA plan. I appreciate your hard work and will be eager to hear about your decisions.

Sincerely,

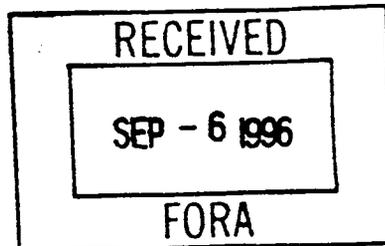
Nada Kovalik

Nada Kovalik

TAMC • TRANSPORTATION AGENCY FOR MONTEREY COUNTY

Regional Transportation Planning Agency • Congestion Management Agency • Local Transportation Commission
312 East Alisal Street, Salinas, California 93901-4371 • (408) 755-4812 / 647-7777 / FAX (408) 755-4957

September 4, 1996



Ms. Ann Heibenstreit, Planner
Fort Ord Reuse Authority
100 - 12th Street, Building 2880
Marina, California 93933

RE: Draft Fort Ord Reuse Plan and Environmental Impact Report

Dear Ms. Heibenstreit:

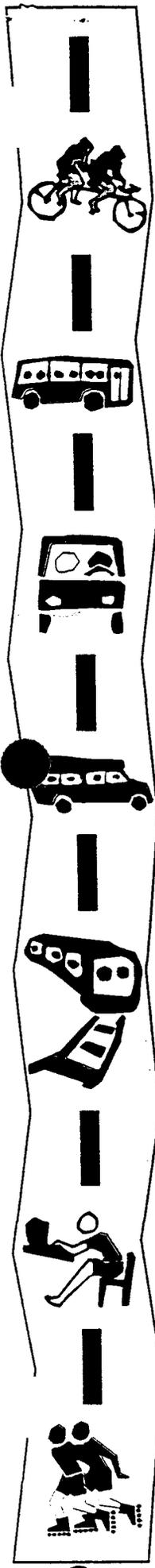
Thank you for the opportunity to review the Draft Fort Ord Reuse Plan and Environmental Impact Report (EIR). Staff has reviewed the document and prepared the following general comments. Detailed, specific comments on each volume of the Plan and EIR follow in an enclosure to this letter.

General Comments:

- The EIR should clearly identify impacts, mitigation measures, and financing for each project. These should be presented in one summary table in the traffic impact section.
- The EIR should ensure that the Fort Ord Reuse Authority (FORA) significance criteria for traffic, air quality and transit impacts match the adopted Transportation Agency for Monterey County (TAMC) Regional Transportation Plan (RTP) and Congestion Management Program (CMP), as well as the Monterey Bay Unified Air Pollution Control District (MBUAPCD) Air Quality Management Plan (AQMP).
- The EIR should address the fiscal impacts to FORA member agencies when Level of Service (LOS) falls below the adopted standard.
- The FORA Plan and EIR should ensure that RTP and CMP goals, objectives, and policies are followed. The RTP and CMP and the Monterey-Salinas Transit (MST) Short Range Transit Plan (SRTP) policies clearly identify that responsibility to fund major infrastructure and new service must come from new sources of revenue and are in part the responsibility and jurisdiction of each land use approval agency, including FORA.

The above issues must be considered if FORA intends to utilize Sections 15091-15093 and make any statements of overriding consideration relative to traffic and transit impacts.

CEQA requires that the proposed projects' impacts be disclosed. Since no analysis is provided as to the impact of post-2015 growth and Ultimate Buildout, CEQA Sections 15124, 15125, and 15126 are not being adhered to and full disclosure of project impacts is not provided.



Lack of a forecast is not sufficient reason to not disclose impacts of the project. For many years, developers, project proponents and transportation professionals have assessed project impacts without forecasts and models. We suggest that the following procedures be used:

1. Use 2015 model outputs for the base traffic levels.
2. Manually generate trips from the year 2015-Ultimate Buildout and distribute these trips in addition to volumes from Item 1.
3. Calculate average trip time, road LOS, transit impacts (time = money when buses are delayed in traffic queues).

Why does this EIR not:

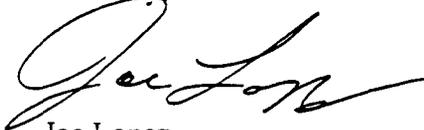
- a. Define the project goal as a quantifiable number (i.e., jobs, revenues to local jurisdictions, dwelling units, etc.) so that the land alternatives can be assessed in terms of success/failure in meeting economic goals?
- b. Evaluate traffic and transit system impacts for the entire project - post 2015?

Your responses to public comments should be provided within the context of CEQA's definitions of a "project" and "Environmental Impact."

The DEIR states that an unavoidable significant impact of increased travel demand on the regional transportation system would occur, both as a result of implementation of the proposed project as well as cumulative impacts with other regional development projects. Major revisions to the FORA plan and Draft EIR (DEIR) are needed to address TAMC's concerns. In addition, the issue of downscaling or rearranging the land use plan along the transit corridor is not presented as an alternative in either the FORA Plan or EIR. Utilization of the existing railroad tracks for local transit is also not evaluated as an option to reduce traffic impacts. We recommend that a revised plan and DEIR be prepared and recirculated for public review.

Thank you again for the opportunity to comment. Please do not hesitate to call me at 755-5077 if you have any questions or require assistance.

Sincerely



Joe Lopez
Transportation Planning Supervisor

Enclosure

cc: Frank Lichtanski, Monterey-Salinas Transit
Nick Nichols, Monterey County Public Works Dept.
Nick Papadakis, AMBAG Areawide Clearinghouse
Bill Phillips, Monterey County Planning & Building Dept.

DRAFT FORT ORD REUSE PLAN

VOLUME 1: CONTEXT AND FRAMEWORK

Section 3.5

(Page 3-66) The Draft Reuse Plan (hereinafter the "Plan") states: "No improvements directly related to the reuse of former Fort Ord are required, but the proposed network does include the Prunedale Bypass." TAMC staff finds this statement erroneous. Our forecasts for congestion management planning indicate significant decreases in LOS between 1990 and 2000. The Prunedale Bypass is currently only partially funded, and is not assured to be completed until additional local funding sources become available. Text in this document and all model runs conducted as part of the Plan should reflect the current transportation network capacities only.

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- Is the section of Hwy 101 north of Hwy 156 or Hwy 156 itself, or any other congestion management program segment/intersection expected to be significantly impacted by cumulative development if the Prunedale Bypass is not built by 2015?
- Is the Prunedale Bypass listed as a mitigation measure for those impacts? If so, it must either be funded partially by FORA or removed from the modeling. Additionally, when the mitigation monitoring chart is complete, you will need to confirm the claim made in this section that no improvements to regional roadways are needed.

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(Page 3-66) The discussion on Davis/Reservation Road states "the upgrading of Davis between Blanco and Reservation, and Reservation between Davis and Intergarrison is proposed with the intent of establishing this route as an attractive alternative to Blanco between the former Fort Ord and Salinas." This section of Davis Road is closed during the winter months due to flooding conditions on the Salinas River. Are improvements to this section included as mitigation measures by the Year 2015? Funding details should be provided for this bridge and road widening. If a bridge on Davis Road across the Salinas River is not funded and not expected to be completed by 2015, then the model runs and associated transportation impacts must reflect conditions during the winter months.

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VOLUME 2: REUSE PLAN ELEMENTS

6

Section 4.2 (Circulation Element)

(Page 4-85) The Plan states that the arterial LOS methodology based on the Florida Department of Transportation (FDOT) methodology is the one "used by the Monterey County Congestion Management Agency (CMA) to prepare their Congestion Management Program (CMP)." The CMP actually uses the intersection level of service methodology from the Highway Capacity Manual to determine which signalized roadway sections require deficiency plans. Figures 1 and 2 of the CMP should be consulted as to which HCM chapter is used for LOS monitoring. By law, the CMP LOS monitoring must use the most recent methodology for the HCM. The FDOT arterial LOS methodology is used by the CMP to forecast future LOS using MCTAM model outputs and assess the cumulative impacts of forecasted development on the regional transportation system. Current LOS calculations do not use the Florida Method and use the HCM. Text in both the Plan and EIR needs to be revised accordingly.

(Page 4-96) Several roadway sections listed in Table 4.2-2 do not meet the TAMC LOS Standards listed in the CMP or RTP under the financially constrained "Build" scenarios now. The following roadway sections should be clearly identified as significantly impacted for both the proposed project and for cumulative growth in the year 2015 and build out time frames:

Hwy 1, north of Hwy 68	Del Monte Ave. (El Estero to Broadway)
Hwy 1, north of Castroville	Del Monte Blvd, Marina, (Hwy 1 to
Hwy 68, Hwy 1 to San Benancio Road	Reservation)
Hwy 101, north of Hwy 156	Fremont Blvd in Seaside
Hwy 156	Reservation Road, Hwy 1 to Davis Road
Hwy 183	Blanco Road, Reservation to Davis Road
Any impact to adjacent jurisdictions'	Davis Road, Hwy 101 to Blanco Road
highway or arterial LOS (Santa Cruz, San	Davis Road, Blanco to Reservation Road
Benito Counties)	Arterial network within Fort Ord

(Page 4-100) Several on-site roadway facilities listed in Table 4.2-3, under the Financially Constrained Scenario, do not meet the TAMC LOS Standards listed in the CMP or RTP. The following roadway sections should be clearly identified as having (unmitigated) significant impacts from cumulative growth and the proposed project in the year 2015:

12th Street/Imjin, Hwy 1 to California	North-South Road, Coe to Broadway
Lightfighter, Hwy 1 to North-South Road	California Avenue, Reservation to 12th Street
2nd Avenue, 12th Street to Lightfighter	

Again, since data beyond Year 2015 is not available, the year 2015 through Buildout land use must be removed from the plan or FORA will face the considerable problem of unmitigated project impacts. The DEIR states that due to lack of a regional forecast beyond 2015, buildout cannot be assessed. Pursuant to CEQA Section 15091 there must be substantial evidence in the record upon which to make findings of overriding consideration. As there is no forecast data beyond 2015, there cannot be substantial evidence on traffic congestion and air quality impacts and thus there cannot be sufficient data and findings made to support the land uses not contained within the approved AMBAG 2015 forecast.

(Page 4-104, Streets and Roads Policy A-1) The DEIR states that "FORA and each jurisdiction with lands at former Fort Ord shall coordinate with and assist TAMC in providing for an efficient regional transportation network to access former Fort Ord." Mitigation measures consisting of further studies or agency coordination not tied to a specific financially constrained action plan are not mitigations per CEQA and case law. The Plan should eliminate this policy unless it specifies feasible (environmentally and financially) mitigation measures that are tied to performance standards.

(Land Use and Transportation, Page 4-118) A Transit Policy directing jurisdictions with land at former Fort Ord to promote land uses consistent with Volume 1, Section 3.5.5 should be included. In addition, each jurisdiction should coordinate with and assist Monterey-Salinas Transit in developing a funding mechanism to implement transit and paratransit services on Fort Ord. Without provisions for additional funding, especially for operations, MST would have to cut service from other areas in order to serve Fort Ord. This potential impact would directly result from the project and must be evaluated by the EIR.

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Funding must be identified for operating costs and ongoing maintenance of the fixed guideway/ rail service to serve Fort Ord if rail service is identified as a mitigation.

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(Page 4-119, Land Use and Transportation Policy A.2, Program A.2-1) A requirement should be included in the Plan and EIR that each jurisdiction is required to design and construct bicycle routes and pedestrian walkways in conformance with the standards provided by the Plan, Table 4.7-5 and Figure 4.7-4. The Bicycle System Plan and bicycle system facilities should also be reviewed for consistency with the Monterey County General Bikeways Plan and Caltrans standards.

14

(Page 4-119, Land Use and Transportation Policy A.1, Program A-1.2) The Plan states: "Each jurisdiction with land on former Fort Ord shall require new development to conduct a traffic analysis to determine impacts on traffic conditions, require measures such as TDM programs and traffic impact fees to mitigate these impacts." Are these jurisdictions legally bound to include a traffic ordinance fee consistent with the Public Facilities Improvement Financing Plan (PFIP) and include this policy in their General Plan? To be a mitigation under CEQA, this policy must also specify a date certain by which this will be done, a linkage between having the fee in place and issuing building permits and plan approvals that the traffic analysis determine project specific and regional traffic impacts consistent with the Plan EIR, PFIP, and CIP. Said ordinance must also be contained in the mitigation monitoring program.

15

CEQA Section 15130 requires that cumulative impacts analysis include:

- a list of past, present, and reasonably anticipated future projects producing related cumulative impacts, including those projects outside the control of the lead agency or
- a summary of regional projections
- examination of reasonable options for mitigating significant, cumulative impacts.

In some cases, the only feasible mitigation is the adoption of ordinances and/or regulations as opposed to the imposition of conditions on a project-by-project basis.

Both the fee ordinances and the transit/pedestrian fixed guideway access and financing need to be addressed thoroughly in the EIR to include proposing specific ordinances that must be adopted and implemented prior to development. In addition, the projects must pass air quality conformity, CMP LOS standards, multimodal, and financial feasibility hurdles prior to being programmed in the CMP Capital Improvement Program or Regional Transportation Improvement Program (RTIP). A "new" use of housing over 70,000 population at Fort Ord will have a very difficult time meeting these requirements unless mitigations are extensive and real. Coordinating, encouraging, discussing, and mentioning mitigations "such as Transit Demand Management (TDM) programs" are not mitigations.

Further, the impacts are listed as "unavoidable" significant impacts when in fact, revising the land use plan, implementing paid parking, funding both rail and bus service, and designing accessible neighborhoods for bikes, pedestrian, vanpools, buses, and rail are each actual mitigations that would reduce significant impacts. These mitigations are not clearly defined, committed to, or funded. The Draft EIR fails to address significant traffic impacts resulting from the base land use plan.

16

TAMC's adopted RTP, CMP and its FEIR each require that several approaches be used to relieve traffic congestion. In addition to new construction, bikeways, pedestrian, transit, transportation demand management, trip reduction strategies, and land use policies must be evaluated. Deficiency plans for roads operating or forecast to operate below LOS D must investigate multimodal

17

alternatives for improving LOS. The level of significance for FORA impacts is the LOS standard (and methodology) contained in the adopted RTP and the CMP. The failure to mitigate significant impacts and the lack of firm multimodal alternatives, incentives, and operating funds are fatal flaws in the current EIR. It is inconsistent with the CMP and RTP and SRTP as well as being beyond the regions' ability to fund.

APPENDIX B: BUSINESS AND OPERATIONS PLAN

Public Facility Improvement Financing Plan

(Special Tax for Transportation Improvements, PFIP 5-1) The CEQA Guidelines Section 15130 states: "The only feasible mitigation for cumulative impacts may involve the adoption of ordinances or regulations rather than the imposition of conditions on a project by project basis." All of the ordinances and regulations (e.g., funding programs for PFIP and CIP) should be identified that are assumed to mitigate the cumulative transportation impacts. Each policy, program, or implementation measure that requires funds for the PFIP or CIP should also be listed. This will include TDM, transit operations, and on-going road maintenance. Are jurisdictions with land on former Fort Ord legally bound by this EIR to include in their General Plans and zoning ordinances funding programs for the PFIP and CIP consistent with the Plan before development can be approved? Establishing policies is not a traffic or transit mitigation.

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(PFIP 5-5) The Draft Reuse Plan states "It is recommended that a Mello-Roos Community Facilities District be established to levy a one-time special tax to pay for Base wide transportation improvements." Which implementation measure in the Plan establishes this special tax, and which mitigation measures require its funds? Are jurisdictions with land on former Fort Ord legally bound by the EIR to establish a special tax consistent with the Plan before development can be approved? Can this tax be used for bus and rail operations? Will it be so used?

19

(PFIP 5-5) Does the proposed special tax and the associated data in Table PFIP 5-1 assume contributions will be made by CSUMB and/or the University of California? If so, the EIR must define CSUMB's and UC's contribution. The EIR should also state whether Mello-Roos will be used to cover transit operating costs which are currently not funded in the developer fee scheme.

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It is not realistic to propose alternative travel modes to reduce traffic impacts and then omit operating funds for trip reduction, shuttles, access/transit center operation, and rail operation from the Public Facilities Plan. The mitigations for traffic impacts must be funded to be considered mitigations under CEQA.

22

The Process of Preparing the Public Facility Improvement Financing Plan

(PFIP 5-10) The Draft Reuse Plan states: "Levels of Service (LOS) and Timing Standards for each major service are adopted. The term 'Timing Standards' refers to an adopted policy as to when a public improvement must be in place to avoid an unacceptable degradation in the Level of Service." The Timing Standard should be identified in the Mitigation Monitoring Plan. Are jurisdictions with land on former Fort Ord legally bound to include in their General Plans, Capital Improvement Programs, and zoning ordinances Timing Standards that are consistent with the Plan? If not, how will the timing standard mitigation occur? Are the Timing Standards consistent with the methodology and LOS standards established regionally by the CMP and RTP? These questions require answers prior to TAMC finding the plan consistent with the RTP and CMP.

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Is there a Timing Standard for transit service improvements? If not, why not?

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DRAFT ENVIRONMENTAL IMPACT REPORT

25

Project Description/Westside Highway 1 Transit Center

Table 2.4-2 should be revised to correct the statement that there exists “incompatibility between transit center and coastal habitat.” The proposed project column shows “No impact; transit center removed from coastal area.” Both statements are incorrect.

- First, the reuse of the existing freight loading dock for rail/bus passenger loading/unloading was considered during the Habitat Management Program and has been contained in Fort Ord Reuse plans and actions since the HMP.
- Second, a Memorandum of Understanding (MOU) for access and joint planning between TAMC (rail implementing agency) and the State Parks and Recreation (dunes park implementation) has been entered into by the two parties to ensure coordination of plans.
- Third, TAMC has an active conveyance request with the Army for conveyance of the balloon spur track, stub end tracks, trackage rights on the Monterey Branch line and the loading dock. We intend to use the loading dock as an excursion boarding/deboarding location and bus/rail transfer point during the Peninsula’s many special events. This intent has been contained in TAMC plans, studies, and correspondence with both FORA and State Parks and Recreation. Please revise the chart to remove erroneous information.

Section 2.2.1 Mitigation Monitoring Plan (MMP)

(Page 2-4) The DEIR states: “Mitigation measures are identified for those impacts which are considered to be significant or potentially significant, after implementation of the Reuse Plan policies and programs.” Each individual road and transit route with significant transportation impacts, their mitigation costs, and funding sources need to be clearly identified in the Traffic Impact section.

26

(Page 2-4) The DEIR states: “The draft Mitigation Monitoring Plan for the proposed project has been combined with the summary of impacts and mitigation measures into Table 2.5-1.” The MMP should include a list of specific improvements for individual roads on and off-base that were identified as mitigation measures in the EIR, their funding source, as well as which jurisdiction or transit operator is responsible for implementation, time frames, and monitoring.

27

(Table 2.5-1) The DEIR summarizes the environmental impact related to traffic and circulation as follows: “Increase Travel Demand on Regional Transportation System” and to “Increase Travel Demand Within Former Fort Ord.” The MMP fails to clearly state which regional roads will be impacted after mitigation measures are in place (i.e., those expected to be “unavoidably significant”); the LOS forecast for those roads; and does not include a clear identification of which mitigation measures for individual roads (both on and off base) are tied to the Timing Standard. It must provide a quantifiable mitigation measure that can be implemented to reduce the traffic impacts.

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No mitigation is proposed to pay to maintain existing transit levels of service as traffic congestion increases.

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No mitigation is proposed to reimburse MST for lost fares as a result of a system wide slow-down in schedule speed of the bus system.

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Section 4.7.1 (Level-of-Service Methodology)

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(Page 4-66) The Florida DOT *Level of Service Standards and Guidelines Manual* relies on an arterial LOS methodology. The EIR should state that isolated intersections may not meet LOS standards even if adequate LOS measurements are reported for the arterial. All charts should be footnoted so there is full disclosure of impacts. TAMC's monitoring of LOS uses the HCM which in numerous cases is intersection rather than arterial LOS. Thus, the intersection LOS reductions/worsening will have fiscal and deficiency plan impacts long before arterial LOS are noticed using the Florida Method. The EIR and mitigation monitoring program should utilize the same HCM chapters as TAMC's adopted Congestion Management Plan and the Timing Standard will require adjustment accordingly.

(Page 4-66) The EIR inaccurately states that TAMC has "established acceptable service levels as LOS D or better." The TAMC Regional Transportation Plan (RTP) "strives to attain and maintain LOS C for the roadway network." The CMP has established LOS standards as short range goals for each road on the CMP network to guide progress towards attaining LOS C. These are contained in Figures 1 and 2 of the adopted CMP. The Transportation Impact section must apply the same LOS Standard for each roadway section of the adopted CMP networker as well as the expected LOS for the project alternative. It must also indicate which roadway section is not expected to meet the LOS Standards in both the Year 2005 and 2015 as well as the Buildout Time Frame. Additionally, the EIR should propose which roads and transit routes on Fort Ord are considered principal arterial routes or significant transit corridors.

Section 4.7.4 (Environmental Impacts and Mitigation)

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(Assumptions on Future Conditions, Page 4-77) The list of off-site improvements in the Financially Constrained Scenario (listed in Table 4.7-2) omits the widening of Highway 68 in Monterey, which is included on page 4-77 of the text.

(Page 4-78) The DEIR states that the Financially Constrained Scenario "reflects the unmitigated impacts on the regional roadway network of the project plus the cumulative growth through 2015." The following supporting data should be included:

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- Each roadway sections in Table 4.7-3 exceed the significance criteria, and therefore are significantly impacted by cumulative growth?
- What percentage of the cumulative transportation impacts for each regional road section is expected to be significantly impacted?
- Which of these roadway improvement projects are mitigation measures and to what degree is LOS improved?
- Which transit corridors will require additional service, new service, or additional frequencies due to traffic congestion?
- What is the cost of this service? How is it funded?

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(Results of Traffic Modeling, Table 4.7-3) Any adjustments (i.e., post-processing) made to the model results (e.g., reductions to reflect pass-by trips, trip chaining, or TDM programs) should be quantified and footnoted. A footnote should also be included to indicate the assumed mode split used in the model runs. If historical mode split is used, please explain why and the percent of trips you expect to use alternatives to Single Occupancy Vehicles.

37

(Table 4.7-3) The model results for Davis Road (Reservation to Blanco) under the Financially Constrained Scenario are questionable, because of winter closure of the section from Reservation to Blanco Road. Table 4.7-3 indicates that traffic volumes on Davis Road are expected to increase from 10,900 to 23,800 (12,900 trips - 118 percent increase) by the Year 2015; however, no roadway improvements are listed in Table 4.7-2 to rectify the winter flooding conditions. This unrealistic growth in traffic volume may result in inaccurate model results for Blanco Road (Davis Road/Reservation), Hwy 183, and Hwy 156. Model results should reflect any expected winter closure of that portion of Davis Road. Also, be advised that widening of these roads is not within the financially constrained RTP adopted by TAMC nor is a new bridge in the RTIP or county CIP.

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(Page 4-78) The Financially Constrained Scenario lists "Roads that would exhibit little or no change of LOS E/F." These roads still have the potential to be significantly impacted, and must be identified if impacted by the proposed growth or cumulative growth. Because a road is now already at LOS E/F, does not mean that it is not affected by increased traffic. Travel times should be calculated for local and Monterey-Salinas trips and the degree of LOS F should be shown. Caltrans District 7 (Los Angeles) will provide FORA's consultants with the methodology used to quantify the differing degrees of LOS F. This section should identify: a) cumulative transportation impacts in percentage volume increase over current traffic conditions; and, b) significant impacts in the year 2015 time frames for the following roads:

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- | | |
|---|--|
| Hwy 1 in Seaside and Marina | Davis Road (Blanco to Reservation) |
| Hwy 1 north of Castroville and into Santa Cruz County | Hwy 156 |
| Hwy 68 south of former Fort Ord | Fremont Boulevard |
| Hwy 183 north of Salinas | Reservation Road (Davis to Intergarrison) |
| Del Monte Avenue in Monterey | Highway 101 south of Salinas |
| Hwy 218 | Highway 101 through Salinas to San Benito County line. |
| Davis Road in Salinas | |

(Page 4-78, Optimistic Financing Scenario) Which of the roadway improvements listed under this scenario are identified as mitigation measures for a) for cumulative impacts, and b) year 2015 and Buildout time frames?

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(Page 4-78) The EIR must only include currently funded projects and mitigation measures in the model runs; roadway projects listed for this scenario are not currently funded. The TAMC and AMBAG transportation plans are legally required to be financially constrained and to undergo air quality conformity checks. No transit/TDM projects are shown as mitigations other than capital improvements such as bus purchases and park-and-ride lots. While this is a beginning, in order to use transit and alternatives as a mitigation, these capital improvements must be accompanied by:

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- Ongoing transit operating funds;
- An operating plan showing routes, frequencies, and land uses;
- Pedestrian/transit oriented development standards including parking and access regulations;
- Supportive, implementing ordinances to ensure effective transit, bicycling, walking, car pooling, rail and bus modes within new land uses;
- Funding to purchase the needed marketing, promotion, and fare levels that will shift auto trips into alternative modes; and
- An LOS monitoring program that will provide the information needed by the Timing Standards.

(Page 4-78, Optimistic Financing Scenario) The DEIR states: "...These improvements were designed to address the system deficiencies identified in the previous scenario, while recognizing environmental and financial constraints." It is the lead agency responsibility to mitigate the impact of its project pursuant to CEQA law and to include the impacts of mitigation as well as the project. It is FORA's duty under Section 15021 to minimize traffic impacts and environmental damage and balance competing public objectives. Since the fiscal impacts of base closure and post-closure status of public revenues is not quantified, it is unclear how FORA will balance the competing objectives of traffic congestion management and economic recovery pursuant to CEQA Section 15021, CMP law, and the adopted RTP.

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- Which of the roadway network improvements listed in Table 4.7-2 under the Optimistic Financing Scenario are identified as mitigation measures?
- Are these roadway improvements needed to mitigate the transportation impacts of the cumulative impacts or proposed Reuse Plan in 2015 and Buildout time frames?
- How will FORA be able to certify that the project's economic recovery goals are not met without quantifying the fiscal impacts of closure and each reuse alternative?

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(Table 4.7-3) The LOS results for Hwy 1, from Del Monte to Fremont Boulevard, suggest that improvements are assumed for the Optimistic Financing Scenario but not in the Financially Constrained Scenario (i.e., volumes are comparable, but LOS is improved in the Optimistic Scenario). Table 4.7-3 should list all Hwy 1 Improvements that were included in each model run, and reflect any improvements in the EIR text where appropriate. The modal share for transit must be provided and explained in order to use transit as a mitigation. How does the FORA reuse plan or EIR mitigate impacts on Highway 1 and 68?

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Section 4.7.4 (Significance Criteria)

(Page 4-82) The Significance Criteria are not comprehensive and are inconsistent with the LOS Standards adopted in the TAMC RTP and CMP. The following Significance Criteria based on CEQA and the LOS Standards developed for the RTP and CMP should be included:

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"A project would normally result in a significant impact if it would decrease LOS to levels below adopted TAMC standards; create unsafe conditions; require a new signal or major revisions to a signal; contribute to substantial cumulative traffic impacts; result in transit LOS decline; fail to include multiple modes; cause unacceptable environmental damage; or not be fiscally constrained per the adopted RTP."

The RTP (Policy 1.2.1) established the following applicable LOS standards:

1. No degradation below LOS D for those urban roads operating at LOS D or better as of the 1991 monitoring.
2. No degradation below LOS C for those rural roads operating at LOS C or better as of the 1991 monitoring.
3. No degradation below existing LOS for all other roads as of the 1991 monitoring.
4. For roads on the CMP network operating at LOS F, a Deficiency Plan is required to bring the segment up to LOS E.
5. The CMP, Deficiency Plans, and the Capital Improvement Program will investigate multimodal alternatives for improving roads at LOS D, E, or F.

The County of Monterey uses the following criteria to determine impacts at intersections, which must also be reflected in the EIR significance criteria:

“For intersections already operating at unacceptable levels of D or E, a significant impact would occur if a project adds 0.01 or more to the critical movements volume to capacity ratio. If the intersection is already operating at LOS F, any increase (one vehicle) in the critical movements volume to capacity ratio is considered significant.”

The EIR must include significance criteria that reflects the above criteria for intersections as well as ongoing, existing CMP intersection data.

(Page 4-82) The second significance criteria should be revised to state that a significant effect on the environment would result in reduced circulation, access, or safety for pedestrian, bicycle, *and transit providers and users.*

If FORA was using the U.S. Army’s EIS and filing a Negative Declaration, mandatory findings of significance per Appendix G of the CEQA guidelines would be made, per Appendix G, items a, b, k, l, n, x, y, and z. Per CEQA Section 15089 TAMC requests review of the final EIR and the responses to our comment herein before the plan is approved or the EIR certified.

Section 4.7.4 (Transportation Impacts)

(Page 4-82) The DEIR states that “The Optimistic Financing Scenario is assumed to represent the proposed project, since it reflects FORA’s specific attempts in the Draft Fort Ord Reuse Plan to mitigate any impacts resulting from reuse. However, to the extent that the mitigating measures built into the plan for off-site improvements lie within the jurisdiction of agencies outside FORA’s control, and cannot therefore be assured by FORA, the ultimate basis for existing impact significance at the regional level must remain the Constrained Financing Scenario.” Note that FORA still has an obligation legally to discuss impacts, mitigate impacts, and regulate conditions on a project-by-project basis under CEQA Section 15130, redevelopment law and the legislation creating FORA.

Table 4.7-3 must identify which roadway sections are expected to be significantly impacted by both the proposed development and cumulative development, and whether the proposed mitigation measures bring LOS up to TAMC’s adopted LOS standards, identifying whether the impacts have been avoided or substantially lessened for each roadway section by the proposed mitigation measures. The same must be done for transit service impacts.

If this is not possible under the constrained Financing Scenario, FORA must make findings that change or alter the basic FORA land use plan per CEQA Section 15091. It will not suffice or be acceptable to TAMC for FORA to use Section 15091 (a) (2) and simply state that the highway LOS is up to Caltrans; jurisdictions’ major arterial LOS up to them; transit LOS up to MST. FORA, as the land use planning agency for Fort Ord Reuse, has the ability and concurrent jurisdiction with its member agencies to alter the land use plan, location of user, and access to uses to mitigate the traffic impacts. Feasible mitigations exist and include:

- Selective road widening and funding to do so;
- Selective land use changes;
- Construction of uses along a transit corridor; and

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- Improved transit, bikeway, pedestrian and access/development ordinances/trip reduction ordinances to increase modal share of alternative modes--traffic/transit impact fees--use of the Monterey Branch line.

(Page 4-82) The DEIR states: "The Optimistic Financing Scenario is assumed to represent the proposed project, since it reflects FORA's specific attempts in the Draft Fort Ord Reuse Plan to mitigate any impacts resulting from reuse." Information should be included that supports this statement by clearly identifying which roadway sections listed in Table 4-7.3 are expected to be significantly impacted by cumulative development and the proposed project. Since this represents the "proposed project," all of the roadway improvements included in the model run must be: a) identified as mitigation measures, b) fully funded, and c) linked between funding and fee ordinances and staging/building permit approval.

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CEQA Section 15126 states that: "Direct and indirect significant effects of the project on the environment shall be clearly identified and described, giving due consideration to the short term and long term effects." According to the CEQA Guidelines, FORA must in this section of the report identify each of the individual roadway sections that exceed the Significance Criteria or that are significantly impacted by the cumulative impacts of the Plan (for both the 2015 and Buildout time frames) regardless of geographic, political, or financial constraints. The transportation impacts on individual roadway sections in a separate table in the EIR. This is doubly critical given that decreases in LOS on the CMP network will have fiscal impacts to those jurisdictions in which the roads/transit routes are located. Each of the individual roadway sections of transit routes that exceed the Significance Criteria or that are significantly impacted by the cumulative impacts (for both the 2015 and Buildout time frames) must be identified and mitigated. Environmental impacts must be fully disclosed.

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(Page 4-82) The DEIR states "However, to the extent that the mitigating measures built into the plan for off-site improvements lie within the jurisdiction of agencies outside FORA's control, and cannot therefore be assured by FORA, the ultimate basis for existing impact significance at the regional level must remain the Constrained Financing Scenario." Section 15126 of the CEQA Guidelines indicates that an EIR must clearly identify mitigation measures for each significant transportation impact, and discuss whether the impact has been avoided or substantially lessened regardless of geographic, political, or financial constraints. This section of the EIR should include a separate table listing transportation mitigation measures, identify whether the impacts have been avoided or substantially lessened for each roadway section that is identified as significantly impacted, and the sources and dollar amounts of funding for the mitigation to be implemented.

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(Page 4-83) The DEIR states: "The proposed project combined with regional growth would result in worsening of several currently deficient roadway segments, and the degradation of several additional roadways to deficient levels (LOS E or F). These effects are discussed in the previous section and are summarized in Table 4.7-3." The previous section does not clearly identify which roadway sections will be significantly impacted by the proposed project. Each of the individual roadway sections or transit routes that exceed the Significance Criteria or that are significantly impacted by the cumulative impacts (for both the 2015 and Buildout time frames) must be identified and mitigated. Environmental impacts must be fully disclosed.

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(Page 4-83) The DEIR states: "The operating analysis presented in the previous section identified those roadway facilities which are forecast to operate at deficient service levels in 2015 (see Table 4.7-3), where roadway improvements would be needed to achieve or maintain acceptable service

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levels (see Table 4.7-2)." If mitigation measures are not feasible, the relevant impact should be identified as significant unavoidable. However, FORA must analyze alternatives prior to finding mitigations infeasible (see comment above and CEQA Section 15091). The roadway sections listed in Tables 4.7-3 and 4.7-4 should be clearly identified which are expected to experience significant unavoidable impacts by the Plan for both the 2015 and Buildout time frames. This information should be included in a clearly labeled table in this section of the EIR and the alternatives and mitigations previously listed examined by the final EIR. Plan alternatives should then be analyzed including altering the land use plan content, extent, or form to reduce trips and mitigate the traffic LOS. Measurable project goals for economic recovery should also be provided.

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(Page 4-83) The assumption that traffic impacts are based on model runs using "current mode choice characteristics in Monterey County" is not valid in the model runs (or the associated transportation impacts) unless mitigation measures are included to assure that Fort Ord can expect the current mode choice characteristics. Mitigation measures and policies related to transit should identify operation and maintenance costs for transit service to assure that ridership on former Fort Ord will meet expectations. If operation and maintenance funding are not identified in the plan or EIR, the above assumption is invalid. Model results and transportation impacts should be revised accordingly. If the Southern Pacific rail line is utilized and rail/connecting bus operating dollars provided by FORA, we would recommend you change from the current 2% mode share to 10% of corridor volumes in the peak hour via transit provided that both the rail service and connecting bus service are funded in the FORA Plan.

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(Page 4-83) The DEIR states "Fort Ord's contribution to the volume increases on the regional roadways.... was used to determine former Fort Ord's fair share requirements for each of the proposed improvements. This information was in turn used to develop a funding mechanism by which former Fort Ord development would pay for its share of the impact on the regional transportation system." What policy or mitigation in the Plan or EIR assures the establishment of this funding mechanism? If so, by what date? Are jurisdictions with land on former Fort Ord legally required to include a policy in their General Plan to establish a funding mechanism consistent with the information on "Fort Ord's fair share" before development plans are adopted? The answer to these questions will determine whether mitigation exists in the DEIR.

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(Page 4-86) "Reviewing the options for distributing its financial contributions..." does not constitute a quantifying or legal CEQA mitigation. The DEIR also states "This mitigation measure would reduce the number of geographic distribution of locations sustaining deterioration in LOS, but some significant unavoidable impacts would remain." The roadway segments which are expected to experience significant unavoidable impacts for both the Year 2015 and Buildout scenarios should be identified and listed in separate tables.

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The fiscal impacts of gas tax, RSTP, CMAQ, and FCR funds of failing to meet CMP LOS standards (arterial does not equal intersection LOS) both on and off Fort Ord must be quantified and mitigated for all jurisdictions faced with a Fort Ord-related LOS decrease. The impact fee mitigation is only valid if these fund losses are quantified and compensated through the fees charged. Similarly, the mere creation of congested LOS D, E, and F road conditions causes an operating cost increase for public transit and this impact is not mitigated in the DEIR. Pursuant to Section 15088 and Section 15091 these impacts must be disclosed and addressed.

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Section 5.1.7 Cumulative Impacts (Traffic and Circulation) (Page 5-6) The DEIR states the "The cumulative impact of demands on the regional roadway network is considered to be significantly

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avoidable, since funding for all off-site improvements cannot be assured." FORA has the responsibility to develop and implement a funding program necessary for Fort Ord's share of impact on the regional transportation system or reduce its land use plan pursuant to Section 15091 and Government Code 65089.

All Charts

All charts showing traffic impacts and mitigations must show the specific road, intersection or transit route impacted by increased traffic. The mitigation monitoring program must specify each LOS decrease by route segment and its corresponding mitigation to be complete in CEQA. Table 4.7-3 must show current LOS per the CMP Figures 1 and 2 for the FORA Plan to be deemed consistent with regional plans. Current LOS shown on Table 4.7-3 is inconsistent with the 1994 Congestion Management Plan (CMP). The correct LOS as well as the adopted CMP standard and Highway Capacity Manual (HCM) chapter used can be obtained in Figures 1 and 2 of the adopted CMP and must be used.

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COALITION of HOMELESS SERVICES PROVIDERS



Ruth Jackson, President

Member Agencies

**CHILDRENS SERVICES
INTERNATIONAL**

**FOOD BANK OF
MONTEREY COUNTY**

**HOUSING AUTHORITY OF
THE COUNTY OF MONTEREY**

INTERIM, INC.

JOHN XXIII AIDS MINISTRY

PENINSULA OUTREACH

RSNC VALLEY CENTER

**SALVATION ARMY OF
THE MONTEREY PENINSULA**

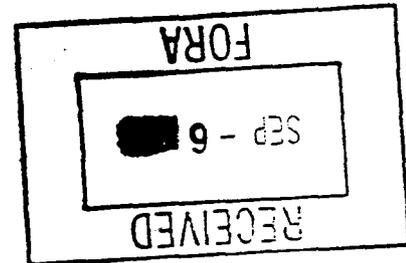
SHELTER PLUS

**VIETNAM VETERANS OF
MONTEREY COUNTY**

**YWCA OF THE
MONTEREY PENINSULA**

August 29, 1996

Les White
Executive Director
FORA
100 12th Street
Marina, California 93933
Telephone: (408) 883-3672



Re: Comments on EIR, Land Use Plan, Operations Plan, and
Context and Setting Document

Dear Mr. White:

Thank you for the opportunity to submit comments on the Draft Land Use Plan, Operations Plan, Environmental Impact Report for the Plan and related documents. The Coalition of Homeless Services Providers is a non-profit agency comprised of eleven non-profit agencies, nine of which are scheduled to receive properties under Title V of the McKinney Act at Fort Ord. All eleven agencies will supply services to homeless individuals on the former Fort Ord, and therefore have an interest in the policies outlined in the Plan. The policies which support a pedestrian friendly village, and bicycle corridor concepts are encouraged and supported. The goals for economic development, and the quest for a jobs/housing balance, and affordable housing are of prime importance to the member agencies of the Coalition.

The Coalition of Homeless Services Providers wish to submit the following comments with regard to the EIR, Operations Plan, Land Use Plan and Volume 1: Context and Framework Document.

The Consultants for the EIR have requested that the comments be submitted independently from one another. The EIR is the prerequisite document which sets the conditions for the Land Use Plan which is the preferred alternative of the EIR based upon the conditions and facts outlined in the EIR. The Context and Framework document outlines the existing conditions from which the EIR makes assumptions. The Operations Plan outlines how the Land Use Plan will be implemented and evaluates the fiscal impacts of the Land Use Plan.

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All of the issues regarding the McKinney Act property acquisition process are intertwined within all four volumes of the Base Reuse Plan and are not independent of one another. Therefore all comments are submitted within this response. Policies outlined in the Land Use Plan, and Operations Plan should serve to mitigate significant impacts identified in the EIR.

Context and Framework Document-

The Context and Framework document under CEQA Guidelines (1993) consists of the Project Description. This Project Description or Context and Framework Document should be accurate and consistent throughout an EIR. An accurate, stable and finite project description is the sine qua non of an informative and legally sufficient EIR. A curtailed or distorted project description may stultify the objectives of the reporting process. Only through an accurate view of the project may affected outsiders and public decision makers balance the proposal's benefit against its environmental costs, consider mitigation measures, assess the advantage of terminating the proposal and weigh other alternatives in the balance. The Guidelines serve to guide the contents of a Description of the Projects Setting. The draft EIR must include a description of the environment in the vicinity of the project, as it exists before the commencement of the project, from both a local and a regional perspective.

It should be noted that the CEQA Guidelines, S. 15168, subd. (c(5)) indicate:

... "A program EIR will be most helpful in dealing with subsequent activities if it deals with the effects of the program as specifically and comprehensively as possible. With a good and detailed analysis of the program, many subsequent activities could be found to be within the scope of the project described the program EIR, and no further environmental document would be required." . .

For example the Volume 1 document: Context and Framework document contains information which is not accurate regarding the status of the McKinney Act. Title V of the Stewart B. McKinney Act allows housing and related facilities to be set aside for the use of non-profit agencies which serve the homeless.

It is requested that the following factual information be included within the Context and Framework, or the Land Use Plan:

The former Fort Ord Reuse Authority at its meeting of December 9, 1994 voted to remain under the old McKinney process instead of the new (at that time) Base Closure Community Redevelopment and Homeless Assistance Act of 1994.

The December 1994, Base Reuse Plan outlined the Federal Transfer Priorities:

... " The first two major priorities for disposal in the normal DoD disposal process involves first, transfer to other users within DoD and second, transfer to another federal agency. The McKinney Act screening for homeless services purposes also falls within the general category of federal level screening. The McKinney Act Transfers were identified as a Federal Priority under the Steward B. McKinney Act. This fact, and the Base Closure Bill requirement regarding the homeless make it clear that addressing the needs of the homeless is a high federal priority in the base reuse and redevelopment planing.

Decisions within these priorities are normally out of the formal control of state and local agencies. Accordingly, in order to rationalize communication between potential McKinney applicants, base reuse authorities, and the federal government, Leon Panetta suggested and helped to bring about the creation in 1992 of the Coalition of Homeless Services Providers a 501(c) (3) Corporation in the State of California. With the Housing Authority of Monterey County acting as the lead agency, the Coalition has integrated its planned services with the findings of the 1989 Monterey County Homeless Services Plan. This plan seeks to break the cycle of homelessness by providing a continuum of services designed to empower families with the skills and techniques needed in mainstream society.

The wisdom of Mr. Panetta's efforts to coalesce the McKinney applicants into a coalition was proven when acting as a whole and coordinating to ensure key services would not be lost, several members of the coalition accommodated the wishes of the community and amended their applications regarding site selection for the benefit of UCSC and CSUMB.

All eleven coalition McKinney Act applications have been approved. The Coalition has proven to be an effective vehicle for facilitating and coordinating the many diverse interests, needs, and desires of the homeless service provider community. Without it, ensuring that meeting the requirement of addressing the needs of the homeless in a comprehensive way would be significantly more problematic. It will continue to be a necessary link to the McKinney applicants as infrastructure, environmental and community issues are identified and resolved.

Because of the critical need for the services to be provided, and the requirements and stipulations of federal law, the McKinney transfer process will be expedited with conveyance (at that time scheduled to begin in Spring of 1995).

As homelessness can be seen as both a result and a cause of negative economic and social conditions, the McKinney Act transfers can be seen as an opportunity to acquire critically needed facilities required for social programs to be effective. Effective social programs combating homelessness and the causes of homelessness are invaluable assets to the community, and are an appropriate and necessary part of base reuse and redevelopment plans.

As the political jurisdictions and the members of the Coalition of Homeless Services Providers work toward a national model for defense conversion, the integration of homeless projects under the McKinney Act into the community, to encourage opportunities for upward mobility for tenants participating in transitional housing programs and the integration of the now homeless population into self-sufficiency through stabilization in suitable long term housing will continue to be one of all entities.

The opportunity for local governments to work with homeless providers and provide adequate public services to meet the needs of each individual project demand attention of decision makers of the costs of provision of services to the homeless and where private and public revenues and resources are available to meet these needs.

Joint decision making vehicles, including agreements for potential sharing of costs and facilitates for public services on an interim and long term basis should be explored by the reuse agency and the local jurisdictions, in support of the McKinney programs.

As a result of the foregoing narrative the following was a Recommendation:

The way the McKinney Act is currently structured, undue stress is places upon the homeless providers and local governments to carefully and cooperatively plan for homeless units to be provided in a way which is compatible with future long term land uses, and zoning designations not currently in place under state and local law. FORA is in a limited way a vehicle for providing some cooperative interaction in a non-political setting to seek mutual beneficial solutions to existing conflicts.

Other recommendations included:

In addition, a local coordinating effort utilizing homeless providers, the Housing Authority, the County Social Services staff, local governmental representatives and land ✓

use planning staff from each individual jurisdiction which will be expected to accommodate the proposed homeless projects would be convened at the earliest possible time in the process. This can establish appropriate working relationships to be developed and in place throughout the process.

The use of private sector resources and volunteers is key to successful implementation of McKinney Act proposals for the homeless at Fort Ord. The Housing Authority will play a key role in facilitating the provision of a housing strategy for base reuse of which the McKinney Act proposals are only a component.

A clear direction must be established on the issue of local governments' obligation to provide municipal services while the homeless provider sites are held in federal ownership through federal leases. Arrangements for federal funding or other sources for these services must be promptly established if local government is required to provide these services, whether during interim leases or thereafter.

None of the foregoing recommendations which were adopted by the Interim Base Reuse Plan in 1994, or included in the Policies of the Draft Land Use Plan Elements, Operations Plan, or other related documents. Additionally, the present documents assume no consideration over the years has been given to the McKinney transfers during the past planning process.

It should be noted that on page 2-37 the Framework document states: . . . "FORA is in the process of screening 11 public benefit conveyance requests received in compliance with the McKinney Act. . ."

This language should be changed to reflect the facts, which are contained in the Interim Base Reuse Plan, adopted on December 12, 1994. FORA does not have the authority to screen the applications, these properties have been granted to the providers under the Federal screening process, no other requests have been subject to such scrutiny. Health and Human Services and the Department of the Army are bound by federal law to transfer the properties under the McKinney Act. Due to the decision made by FORA, after extensive study sessions with the Coalition members and other entities, voted to retain. The Base Revitalization and Closure Act does not apply to the properties which were screened under the McKinney Act due to this decision made by FORA, therefore are not subject to any local screening process by the redevelopment authority prior to transfer.

The brief overview of the McKinney Act properties does not properly set the context of the importance of the conveyances or the scope of the planning which has been

accomplished over the years during the development of the base reuse plan which includes the eleven member Coalition of Homeless Services Providers and the member agencies respective programs.

It should be noted, CEQA Guidelines (1993) Chapter II, outlines Housing Policy pursuant to the 1979 state housing policy adopted by the Legislature which declared that every Californian should be able to enjoy a decent home and a satisfying living environment. This goal for California must now be balanced with the earlier and continuing goal for a high-quality, healthful, and aesthetically and intellectually pleasing environment. The new law (as of 1993) instructs public agencies never to reduce the proposed number of housing Units in a project as a mitigation measure or project alternative whenever another feasible specific measure or alternative could provide a comparable level of mitigation.

The Continuum of Care proposed by the Coalition member agencies will comprise a large portion of housing for low-income people when viewed in the context of the overall base reuse plan documents. The Continuum is extremely important to the implementation of the County of Monterey's five year Homeless Services Plan. Additionally, prior EIS documents prepared by the Army, and reports and studies prepared by Sedway and Associates, and other various consultants have documented the positive impacts that the McKinney programs will have upon the community.

Environmental Impact Report Document-

The use of economic development land use goals has historically been utilized to block access to, or reduce the availability of services by non-profit agencies to low income people. The use of economic and social impacts has often been utilized as a means to attempt to identify significant impacts on the environment. It should be noted that the term significant effect on the environment is a substantial or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including, land, air, water, minerals, flora, fauna, ambient noise and objects of historic and aesthetic significance. The definition goes on to state that . . . "an economic or social change by itself shall not be considered a significant effect on the environment". . . CEQA Guidelines state that: . . . "There must be a physical change resulting from the project directly or indirectly before CEQA will apply. In other words, if a proposed project may cause economic and social consequences, but not significant environmental impacts, CEQA does not require than an EIR be prepared. The lead agency must consider economic, social, and particularly housing factors, together with technical and environmental factors, in determining the feasibility of proposed measures to reduce or avoid significant effects identified in the EIR". . .

The following are some facts which should be included in the narrative regarding the EIR, specifically the section which addresses social services and socio-economic impacts pages 4-23 through 4-25. This section of the EIR contains a brief overview of the social and economically disadvantaged persons within the County and the Peninsula of Monterey, which does not fully illustrate the growing trends which the County must address within the planning period. **This narrative should be expanded to educate the public about the need for economic development and housing programs, and to justify policies related to housing and social services as well as economic development principles. This section may be utilized as a justification for a Statement of Overriding Considerations, Findings of Fact and the development of Mitigation measures.**

These alarming trends will impact the County in the coming years, will impact social services, housing programs and, create the need for additional police services and other services if not addressed by the Community in a proactive manner through the community planning process, which is fully cognizant of social trends. The proposed programs at Fort Ord will serve to mitigate these growing adverse trends in society through the provision of affordable housing, social services, educational resources, concentration of development in areas already developed. Additionally, residential development will be directed away from prime farmland and create jobs for the under-employed.

This information serves to guide the Entitlement communities in the development of priorities for provision of housing and social services to less economically fortunate persons in these communities, and sets priorities for the expenditures of Community Development Block Grant funds and HOME funds. Additional information is from the County of Monterey's Housing Element and the City of Marina Housing Element, and the County of Monterey Families 2000 Plan. This information may be considered to be new additional social and economic information which has been gathered from studies which have been performed since the Army EIS was written. These documents illustrate the importance of the provision of social services as a component of the Reuse Plan, in order to provide economic development, and upward mobility for the less economically advantaged citizens of the region. **The following information may serve to enlighten the community, illustrate the social/economic mitigation factors which are occurring through the base reuse process when the integration of the Coalition member agency McKinney Title V programs are fully recognized and integrated into the Plan, as a component of economic development goals.**

The following statistics illustrate and substantiate the need for supportive services and transitional housing programs which will be supplied by the member agencies of the

Coalition of Homeless Services Providers, as well as illustrate the need for an inclusionary housing component to be tied to all future development and any land use planing policies. Additionally, these facts support the provisions of the Draft Plan which are designed to enhance economic development programs, provide a local tax base for affected communities and facilitate the provision of affordable housing programs for low income and median income workers of the County of Monterey.

COUNTY OF MONTEREY- POVERTY- The County is broken into three entitlement jurisdictions: the City of Salinas, the City of Seaside and the City of Monterey; the County of Monterey is a non-entitlement jurisdiction. The major industries are agribusiness, tourism, and government. A conservative estimate based upon 1990 Census data indicates that almost 11% of the population is economically disadvantaged.

The Employment Development Department's Labor Market Bulletin for the Salinas-Seaside-Monterey Metropolitan Statistical data indicates that Monterey County, with a population of over 360,200 people contains a work force of approximately 165,000 workers. Agriculture is the County's most dominant "primary" industry.

In 1992, the overall labor force was 163,800 individuals with 135,300 workers employed and 28,500 workers unemployed which is a 17.45% unemployment rate. Unemployment rates within Monterey County have been consistently higher than those of California as a whole. In 1994, the County of Monterey was rated by the National Association of Home Builders as the second least affordable housing area in the nation. Of all California counties, Monterey County contains the largest percentage of residents who are in the 20-34 age group, which causes the need for additional services. The County of Monterey unemployment rate is further affected by the low skills and experience levels held by a significant number of new job seekers, a surplus labor pool, and the seasonally of the economies.

Due to the high cost of housing for the working poor in Monterey County, many families have been forced to choose between inadequate nutrition or inability to pay for housing. Many working people in the County live in seriously overcrowded conditions, and others live in their vehicles or outdoors, and many of the working poor homeless are families with small children.

Female Heads of Households- The 1990 U.S. Census data reflects the disparity of incomes of married couples with children, male householders with children and female heads of households. The Census indicates the mean income for female heads of households in Monterey County is \$19,560 vs. \$45,672 for a married couple with children.

The 1995 City of Seaside Consolidated Plan indicates there are 904 female headed households with one or more persons under 18 years of age in the City, or 12% of the City's households. The City of Monterey Consolidated Plan indicates the City has 541 or 4.3% of the households as single female headed households with minor children. The City of Marina which contains a large portion of Fort Ord, has the greatest concentration of single female heads of households, The 1995 City of Marina Housing Element outlines the need for child care, recreational programs and other social programs for this population. In 1990 there were 794 families which were headed by females or 17.0% of the population of the City of Marina. The need for programs targeted to poverty level families is great, of 437 poverty level families in Marina, 43% were headed by females.

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In 1995 the Monterey County Department of Social Services as the lead agency for the Family Preservation and Support Program (Health and Human Services Program), completed a 5 year Master Plan, known as Families 2000 (1995) which evolved from a needs assessment which included an analysis of existing data, a key informant survey, and an extensive public input process. The following were indicator data highlights from the Plan:

- ⇒ **In 1989 almost 13% of the families living with children in Monterey County were officially listed as living below poverty level. The number of families receiving AFDC has increased roughly 10% each year since 1989.**
- ⇒ **Parents report the need for child care is a priority need. Lowest income parents reported paying 30% of their weekly household income for child care.**
- ⇒ **Monterey County ranks lower than the rest of the State in child status indicators such as 8th grade achievement scores, prenatal care, teen births, and child abuse reports.**
- ⇒ **Between 1993 ;and 1994, physical abuse cases against children resulting in court action rose by 250%; those involving general neglect rose by 36%.**

Children Now reports that in 1995 the poverty level among California children is outpacing the rest of the Nation. The following are recognized statistical trends which affect Monterey County:

- ⇒ **47% of the children born to unmarried parents will remain in poverty; 28.9% of the babies born in Monterey County are to unmarried parents.**
- ⇒ **Lack of Prenatal Care-47% of the County's population under 18 years is Latino; Latino babies born with late or no prenatal care equate to 15.5% of all Latino births.**

- ⇒ 28.5% of babies born in the County are born to parents who cannot afford health care.
- ⇒ 44% of the County's children have been fully immunized by the age of 2 years vs. Statewide average of 48%.
- ⇒ The California Health Department indicates that children in Monterey County have an inordinately high record of anemia, 24.2% vs. a 16.2% state average. This is a primary indicator of malnutrition.

II. AFFORDABILITY- The 1990 Housing Element for the County of Monterey indicates 26.7% of all renter households in the unincorporated area were lower income households overpaying for rent and 7.7% of all owner occupied households were lower income households overpaying for their mortgage. **The 1990 Housing Element equates that in 1990 there are 2,582 lower income households overpaying for rent, and 1,662 lower income owner occupied households overpaying for their mortgage for a total of 4244 households overpaying. The Element estimates that 45% of all lower income households are overpaying for housing.**

The City of Monterey 1995 Consolidated Plan reports overpaying for rent is a major problem for renter households, because a majority of the lower-income households are renters. The Consolidated Plan estimates 3,181 families in Monterey are very-low-income, 2,166 are low-income, and 2,049 are moderate income. The City's housing stock is comprised of 13,788 occupied units. **An estimated 95% of the very-low income renter households, 81% of the low income renter households, and 41% of the moderate income renter households pay in excess of 25% of their gross income for housing.** Table 1-A outlines the 1990 U.S. Census data which outlines the total number of low income households overpaying for rental and ownership, 35,203 lower income households or 38.29% of all households are in need of financial assistance. In 1990, **16,785 households, or 40.06% of all low income households were in need of rental subsidies. Of a total of 47,451 householders, 35.5%, or 16,845 families, paid in excess of 35% of their income for rent.**

TABLE 1-A -HOUSEHOLDS IN NEED OF FINANCIAL ASSISTANCE

CATEGORY	MONTEREY COUNTY	UNINCORPORATED AREA
All lower income Households	35,203	6,789
Percent of All Households	38.29%	25.60%
Lower Income Households Overpaying		
<u>Renters:</u>		
Number	16,785	2,215
Percent of all Renter Households	40.06%	26.77%
<u>Owner Occupied:</u>		
Number	4483	1399
Percent of All Owner Occupied Households	8.8%	7.7%
<u>Total Households Overpaying:</u>	60.4%	53.20%

Housing Overcrowding- *Housing overcrowding is an indicator of lack of vacancies, lack of affordable units, and substandard living conditions. According to the 1990 Census data, during the past decade the incidence of overcrowded households in Monterey County has increased from 10% to 15%, of all households. Renter households comprise 10.79% of the overcrowded households which is an increase over the 1980 figure of 7%. Census data indicated, that 75.2% of all overcrowded units are renter households. Many of the communities within the County of Monterey have severe overcrowding within their communities. In the community of Salinas, overcrowding is due primarily to the lack of migrant worker housing for farm laborers. The vacancy rates of some communities may contribute to the overcrowding problem by causing families to move into units with other family members until other housing is located. The 1990 Monterey County Housing Element indicates the County of Monterey in comparison with the State, has a higher percentage of large households, indicating a need for continuing production of large "affordable homes".*

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The City of Salinas 1995 Consolidated Plan indicates 22.2% of the occupied units are overcrowded within the City (more than one person per room), which yields a total of 7,440 overcrowded households within Salinas. The City of Salinas indicates that severe overcrowding, (over 1.5 person per room), exists in 4,567 units, or more than 13% of the City's households met this criteria. In addition, the overcrowding condition is not solely a phenomena in rental units; over 2,000 owner occupied units were found to be overcrowded. The rental housing demand increases during the peak growing and processing season (May to November), and there is virtually no stock of seasonal housing units within the City.

The City of Monterey 1995 Consolidated Plan indicates 4.2% of the households are overcrowded within the City. The City of Seaside 1995 Consolidated Plan illustrates that over-crowding is an indicator of substandard living conditions, Seaside contains 712 overcrowded units or 13% of the households in the City.

Substandard Housing- The 1990 Monterey County Housing Element indicates 14.1% of the dwelling units in the unincorporated area and 13.6% of the dwelling units within Monterey County were constructed prior to 1940. AMBAG reported in the Regional Housing Needs Plan, the County of Monterey contained 14,069 dwelling units which were constructed prior to 1940. **The 1990 U.S. Census data indicates within the County of Monterey 11,932 total units or 9.8% of the housing stock was produced prior to 1940.**

The City of Salinas 1995 Consolidated Plan based on a 1991 systematic field survey **determined 29% of the City or 9,700 units are substandard.** The 1994 Consolidated Plan indicated 29% of North Salinas units, 44% of East Salinas units, and 25% of South Salinas units were either substandard (one or more major defects) or suffering from deferred maintenance. The City of Salinas 1995 Consolidated Plan also found that 51% of the total units within the City exhibited a minor degree of blight.

The City of Seaside 1995 Consolidated Plan reports that of the 7,714 dwelling units reported by the 1980 Census, 642 were in need of rehabilitation and 110 were not rehabable for a total of 752 substandard units.

The City of Monterey 1995 Consolidated Plan indicates an estimated 394 units in Monterey have serious deterioration, 1,126 units are clearly declining, and 2,541 units have deferred maintenance needs. The foregoing conditions are caused by the age of the City's housing stock, 25% of which is over 40 years of age.

III. HOMELESSNESS-

Since the adoption of the Homeless Services Plan in 1990, homelessness has increased in Monterey County. Approximately 850 or 28% of the homeless are children with their parents; estimates of homeless individuals in the County are 4,500. Of this total, it is estimated that 600-1,000 are on the Monterey Peninsula. The sub-groups within the homeless population in Monterey County continues to include women with children, male/female heads of household families, single males/females. Special population sub-groups within these broad categories include: mentally ill, chronic substance abusers, veterans and their families, persons with HIV/AIDS, battered women and children, farm workers.

The City of Monterey 1995 Consolidated Plan estimates that 4,500 homeless are in the County at any given time, with 600 to 1000 on the Monterey Peninsula. The Plan indicates Shelter facilities must turn away the homeless daily due to inadequate facilities, with growing numbers of under-employed young single males, many of whom require very little assistance in returning to self-sufficiency. The Consolidated Plan for the City of Seaside indicates with the foregoing criteria, of the 1,000 homeless on the Peninsula, the estimated proportional share of Seaside, to be 25% or 200 individuals homeless at any given time in Seaside.

Additionally, Seaside utilizes data from the Community Housing Plan for Severely Mentally Ill Residents of Monterey County, (1990) which indicates that 800 of the estimated 3,500 chronically mentally ill persons in the County are inadequately or inappropriately housed or overpaying for rents. The Plan cites the following need for the Peninsula: 70 studio units; 40 2/3 bedroom apartments; 24 group living units @ 6 residents per unit; 10 SRO units. The City of Seaside Consolidated Plan (1995) indicates that the County of Monterey contains 5,000 cases of HIV and 375 active cases of AIDS, with 48 AIDS cases in Seaside, and 650 cases of HIV in the City. The foregoing data reflects a growing trend of housing need within the County.

The 1995 Consolidated Plan for the City of Salinas cites the statistic that 50% of the County homeless are within the City, which would equate to 2,250 homeless within the City at any given time.

The "Situationally homeless" are a group of homeless people that have increased in Monterey County over the past decade; this group is defined as: 1) the homeless related to chronic disability, i.e., drug/alcohol addicted, mentally ill, or physically disabled; 2) homelessness related to severe personal crisis, i.e., battered women/men.

runaway/throwaway youth, older displaced poor, 3) homelessness related to adverse economic impact, i.e., unemployment, housing conversion, the "new" poor. With the exception of the chronically disabled, the new homeless population is often comprised of individuals and families who have encountered an economic crisis or who may have employment at minimum or near-minimum wage jobs, but are still unable to support children and maintain a home. While the numbers of homeless people are increasing, the number of homeless families with children is increasing in all communities. 2

- ◆ **Approximately 13% of the homeless within Monterey County are homeless with children living with them. The *Northcutt Study* indicated that in addition to the 1,300 to 2,200 homeless adults in the County, 370 to 630 homeless children are living within the County (in 1989).**
- ◆ **The majority of the homeless persons in Monterey County tend to be single, white or Hispanic males, between the ages of 25 and 44 years of age, who has not graduated from high school; 34% have less than a eighth grade education. Over 75% have incomes of less than \$500 per month; most of the income is derived from performing odd jobs. Community feeding sites (missions, shelters, churches) are the primary sources of food for over 44% of the homeless.**
- ◆ **At least 500 persons are estimated to be at risk of becoming homeless at any given time in Monterey County. Data reported in the study indicated the homeless in Monterey County are not currently receiving public financial entitlements on a large scale basis. The Study noted that 24.5% of the homeless were veterans, of that, 40.8% were involved in combat. Of those in combat 54.3% served in Vietnam.**

In October 1995, the Monterey County Community Services Commission developed a Local Emergency Shelter Strategy, Emergency Housing and Assistance Program, which noted in the last several years, Monterey County has seen an increase in the homeless population. The primary demographic characteristics of the homeless population are included in the Chart 2A: ↓

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CHART 2A
DEMOGRAPHIC CHARACTERISTICS OF HOMELESS MONTEREY COUNTY

GENDER	PERCENTAGE HOMELESS	NUMBER OF HOMELESS
Male	70.4	3,573
Female	20.6	927
TOTAL		4500
ETHNICITY	PERCENTAGE HOMELESS	NUMBER HOMELESS
Hispanic	46.1	2,075
White/Caucasian	37.2	1674
Black	14.9	671
Native American	1.8	80
Asian	0.0	0
TOTAL		4500
AGE	PERCENTAGE HOMELESS	NUMBER HOMELESS
0-17 YEARS	28.5%	1260
18-24 YEARS	16.3	528
25-34	33.0	1069
35-44	25.9	839
45-54	14.5	470
55-64	7.1	230
65 AND OLDER	3.2	104
TOTAL		4500

The Seaside 1995 Consolidated Plan indicates Peninsula Outreach serves 4,900 meals each month to the poor and homeless. Peninsula Outreach data reflected in the Plan, indicates the shelter provided shelter for 242 persons last year. The Peninsula Outreach I-HELP program provided emergency shelter to 208 men last year. The Seaside Salvation Army provided a total of 4,144 food boxes last year of which 2,600 were sack lunches. The Salvation Army also provided supportive case management services for 67 families, day care for 104 children and emergency financial assistance (rental assistance) to 174 families in eminent danger of homelessness, and 265 utility assistance payments. Shelter Plus provided emergency shelter to 232 women, 390 children, and 19 men at their Natividad-Salinas, and King City-South Monterey County sites, for a total person shelter days

of 11,520. The 800 emergency crisis line had 5,430 calls, with 6,313 referrals to supportive services and housing assistance.

Within the County of Monterey only a small amount of community and religious organizations offer emergency shelter for homeless individuals, victims of family violence, and homeless families. A rotating shelter for single males, which is known as the I-HELP program, is held in a variety of Peninsula churches and is operated by Peninsula Outreach. This rotating shelter accommodates approximately 17 single males each night. Primarily, most of the requests are for shelter for homeless families; approximately 400 to 500 persons must be turned away each month.

In 1995 the Monterey County Local Emergency Shelter Strategy reported that families with children may have become the largest homeless population in the County. The Mobile Outreach Team (MOST) reported from October 95 to January 96 (4 MONTHS) there were a total of 248 unduplicated contacts with homeless individuals, which resulted in the following data:

MOST CONTACTS-CLIENT CHARACTERISTICS (3 month period)

GENDER	NUMBER OF PERSONS		ETHNICITY/RACE	NUMBER PERSONS
MALE	198		BLACK/NON HISPANIC	29
FEMALE	50		WHITE/NON HISPANIC	121
AGE			HISPANIC	86
0-5	4		NATIVE AMERICAN	0
6-11	0		ASIAN	1
12-17	0		NOT AVAILABLE	6
18-23	10		FAMILY TYPE	
24-44	161		SINGLE PARENT/FEMALE	0
45-54	32		SINGLE PARENT/MALE	0
55-69	19		TWO-PARENT	0
70 AND OVER	8		SINGLE PERSON	233
NOT AVAILABLE	8		TWO ADULTS-0 CHILD	3
TOTAL	248		OTHER	0
			NOT AVAILABLE	11

HOMELESS VETERANS- National data in *Priority Home* published by the U.S. Department of Housing and Urban Development indicates that roughly one third of the entire male adult homeless population are veterans, and that as many as one half of all homeless adult men have some military service. Within society the number of homeless Veterans today is greater than the total number of military personnel who died in Vietnam. The highest risk veterans are the members of the group of immediate post-Vietnam military service, whose higher incidence of homelessness appears to correlate with higher levels of mental illness and substance abuse. The *Monterey County Homeless Plan* (1990), reported 24.5% of the homeless were veterans, of which 40.8% served in combat. Of those, 54.3% served in Vietnam. A VA Census in 1990, indicated that there are 40,670 veterans in Monterey County.

Conclusions which may be assumed-

Based upon the foregoing factors, the provision of inclusionary housing in any proposed development project or program is extremely important. Since the closure of Fort Ord, and the subsequent loss of associated employment opportunities, the cities have continued to require a substantial number of low level service oriented jobs which further exacerbates the housing trends which are prevalent in Monterey County. These housing trends include overpaying for housing, homelessness, overcrowded and substandard housing conditions all of which lead to a variety of social ills.

The services and programs proposed by the Coalition of Homeless Services Providers member agencies services are necessary to be developed in conjunction with economic development because the conditions which contribute to poverty, illiteracy, drug and alcohol abuse, poor parenting and teen pregnancy must be addressed before any upward mobility can be achieved. The social ills may which seem to accompany poverty and overcrowding are not limited to low income people, it should be noted that the ills of drug and alcohol abuse and domestic violence are prevalent in all levels of society, and contribute to the homeless population on all levels of society. In Monterey County which is one of the most costly housing areas in the Nation, the middle class remains but one pay check away from homelessness, particularly if one member of a working family becomes unemployed or disabled.

Operations Plan-

The EIR indicates that the area will be home to 17,132 dwelling units (13,066 new dwelling units) and 45,457 new jobs. An inclusionary housing ordinance of 15% which assures the permanent affordability to moderate and low income individuals would assure the continued affordability of 2,570 housing units, which may be tied to fostering economic development. The Operations Plan, page 11-13 contains a recommendation which supports this suggested policy.

The Operations Plan page III-2 through 3 contains information relating to regulatory and fiscal strategy and use of the powers of a Redevelopment Agency. Page V-2 further elaborates on the extent of the use of Redevelopment Powers and Project areas, which includes tax increment financing. The use of redevelopment is strongly recommended, and if so utilized, it is recommended that a portion of the 20% tax -increment which is set aside for development of affordable housing be made available to assist with the continued support of the Coalition programs at Fort Ord, to assure continued viability in the forthcoming era of reduced Federal spending.

It should be noted because FORA decided to remain under the McKinney rules, if any of the housing programs fail, the properties are returned to Health and Human Services to be advertised on a National level for homeless programs, therefore, the community should assure that these necessary and vital facilities be reserved for the use of local residents in-need, and local programs. FORA must establish policies and priorities which assure that these programs are fully integrated into the community in a compatible manner, and supported by the community as necessary programs for economic development.

Other funding considerations may include coordination of technical assistance and building of partnerships which will assist the organization of the Coalition of Homeless Services Providers into a Community Development Corporation or other such entity to further the stream of funding from the Federal level for housing, social services, job training, economic development and educational programs. The partnerships which may be forged are great and need to be fully evaluated and clear recommendations made to maximize funding.

The Operations Plan needs to contain clear recommendations that FORA should work to obtain an Enterprise or Empowerment Zone for the former base. This may be accomplished through the legislative process at the State or Federal level. The use of one of these two designations is a very important and powerful tool in obtaining tax incentives for the location of new development, employment generating businesses, and the facilitation of federal grants for community policing, job training, housing, social services programs, day care facilities, and other important programs. The designation of the base as either an Empowerment or Enterprise zone should be elaborated upon in the Operations Plan as a clear recommendation to fund economic development.

The Operations Plan contains a number of tables relating to the needs of the City of Marina proposed Public Safety needs. As a means to mitigate the additional revenues which must be generated to accommodate the need for public safety for the community, the Coalition recommends that the **Land Use Plan contain polices which integrate** ↓

the concepts of Community Policing, which is becoming quite successful in larger communities and which the City of Salinas has utilized in a 20 block project area with quite a large amount of success. Community policing takes police officers out of automobiles and puts them on the streets, on bicycle patrols. The neighborhood becomes more involved in the efforts of the police and crime reduction. Additionally, the use of satellite police offices, and the use of scattered public housing or community owned housing as residential units for officers reduces the incidence of crime and the need for additional public safety revenues for officers, and creates a buy-in for the local community for crime prevention programs.

Land Use Plan-

The need for the cities to adopt clear policies and procedures which outline the project approval process is extremely important. These policies need to be clearly worded to avoid misinterpretation and misuse. The Coalition member agencies are currently attempting to process a number of Use Permits through the City of Marina, which does not have clear policies for development at Fort Ord. Additionally, these non-profit agencies have been subjected to conditions of approval which would make a for-profit developer cringe. **It is essential for business development that the concept of Fast Track processing for affordable housing and economic development projects which utilize existing facilities, be a policy of the FORA Land Use Plan.**

Policies 4.1.2.2 page 4-25-City of Marina

Objective C: Encourage the highest and best use of residential land to enhance and maximize the market value of residential development and realize the economic opportunities associated with the redevelopment of Fort Ord

The plan further elaborates upon the notion the Cities of Seaside and Marina have sufficient supply of low-income housing within their existing residential areas. For the redevelopment of the Fort Ord community within their city limits, the jurisdictions intend to provide moderate and above-moderate income housing to achieve a better housing supply balance and to maximize the market value of the housing stock. While the need for moderate income housing is paramount in the community, this policy has been interpreted by many to be a factor which may be utilized as a rationale to deny use permits to projects under McKinney or to require improvements which would be excessive and cause a low-income project to become infeasible. While balanced communities are important for the facilitation of upward mobility in society, FORA and the local jurisdictions in their quest for upscale development must not utilize this policy and language to eliminate land uses which serve low income individuals in need, who reside within these communities.

Objective F: Balance economic development needs with the needs of the homeless population in the community.

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Several programs are recommended in support of this Objective: The City of Marina is instructed to "strive" to meet the needs of the homeless population in its redevelopment of the former Fort Ord, specifically in the City's Patton Park housing Area. It should be noted the only agency which provides housing to the homeless in Patton Park is the Vietnam Veteran's-Veterans Transition Project which is currently working in partnership with the non-profit developer proposing to develop elderly housing in Patton Park. It is the intent of the Coalition member agencies to work in partnership with the community and developers to facilitate the reuse of Fort Ord, and to foster economic development. **It is recommended that this Policy be reworded to say. . ."The City of Marina shall proactively work with the Coalition of Homeless Services Providers and its member agencies to provide housing and related services to the homeless populations which the agencies serve, to successfully integrate such programs into the former Fort Ord, especially the City's 12th Street and Abrams Housing areas". . .**

Program F-1.2 states: the City shall conduct outreach to homeless service provider and nonprofit low income housing developers to determine homeless needs in the community. This Program should be reworded: **"The City shall offer technical assistance and work in a proactive manner to integrate in the fastest manner possible programs which have been approved under Title V of the McKinney Act, into the community"**. This outreach is unnecessary, the Coalition of Homeless Services Providers is comprised of the major homeless services provider agencies and non-profit housing developers in the County. Over the years these agencies have been attempting to address the needs of the community through the provision of housing and related services at the former Fort Ord. These efforts have been delayed, and made more complicated through the planning and zoning and subsequent use permit processes. Overall the requests of the Coalition member agencies have been ignored by both the Cities and FORA.

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The Coalition member agencies are having difficulties attempting to negotiate an equitable and reasonable planning process with the local jurisdictions, in order to bring properties on line in a cost efficient and timely manner. The programs are being subjected to imposition of standards which from a practical view appear to be designed to make projects infeasible.

Program F-1.3-The City of Marina shall support development of a standard format for the contracts between FORA and the homeless services providers that must be

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submitted to the federal Housing and Urban Development Agency with this reuse plan. The Federal agency in this instance may be the cabinet level U.S. Department of Housing and Urban Development. This language is not consistent with Title V of the McKinney Act which FORA voted to retain. There are not any agreements required to be developed. Although it would facilitate the integration of the programs into the community if an agreement could be made between FORA and the Coalition member agencies which would assure the continued viability of the programs through an agreement with the redevelopment agency for a guaranteed percentage of the Low-income tax increment.

Program G-1.1 in support of Policy G-1 indicates that the City of Marina shall identify focused areas and develop inclusionary zoning to encourage group homes and flexibility in household size and composition. This Program needs definition and explanation, from the wording it appears that the State Housing Element Law has been misinterpreted. State law allows group homes of 6 or less handicapped individuals, elderly, foster children, or mentally handicapped individuals, to be treated as a family and integrated into residential zones without any review, by right.

Section 65915 of State Housing Element Law indicates a developer shall be granted a density bonus if they propose to develop specialized housing for low income families, large families or housing designed to accommodate special needs. Inclusionary housing is the set-aside of a percentage of housing units within a development as permanently affordable units (usually 30 years). Additionally, "focused areas" will cause concentrations of low-income households or stigmatized areas of development of housing for handicapped individuals, which is contrary to the Americans' With Disabilities Act, and Section 504, of U.S. Department Housing and Urban Development policies. If this policy is implemented as worded, future problems will result when Federal Grants are obtained. **The Policy should be reworded to indicate: The development of affordable housing through the use of density bonuses, and inclusionary zoning to encourage flexibility in household size and composition shall be utilized.**

Policy H-1 indicates that the City of Marina shall incorporate policies in its Housing Element consistent with Fort Ord Policies for residential lands. It should be noted that State Housing Element law indicates: . . . ***The Housing Element shall identify adequate sites which will be made available through appropriate zoning and development standards and with public services and facilities needed to facilitate and encourage the development of a variety of types of housing for all income levels, including multifamily rental housing, factory-built housing, mobilehomes, emergency shelters, and transitional housing in order to meet the community's***

housing goals (as identified under S. 65583 of Planning and Zoning Law). . .(b) Where the inventory of sites, . . . does not identify adequate sites to accommodate the need for groups of all household income levels pursuant to Section 65584, the program shall provide for sufficient sites with zoning that permits owner-occupied and rental multifamily resident use by right, including density and **development standards** that could accommodate and facilitate the feasibility of housing for very low and low-income households. For the purposes of the foregoing the phrase **"use by right" is defined the use does not require a conditional use permit, except when the use is a mixed use project involving commercial and residential uses. . . and the City shall assist in the development of adequate housing to meet the needs of low and moderate income households, and address and where appropriate and legally possible, remove governmental constraints to the maintenance, improvement and development of housing". . .**

In light of State Housing Element law is recommended that the foregoing Policy be adopted: **All programs proposed by programs granted properties under Title V of the McKinney Act shall be considered to be legal non-conforming uses, and shall be subject to an inspection by the building inspector subject to Health and Safety Codes.** As noted before, the Coalition member agencies are being subject to conditions which are excessive and burdensome. The housing units at Fort Ord are simply in need of remodeling and rehabilitation and do not need to have cul-de-sac's widened, development of excessive parking requirements, when due to economic condition homeless families do not own more than one vehicle. The programs should not be subject to building codes which would require excessive or extensive rehabilitation to bring up to current building codes. It has always been the intent of the Coalition member agencies to develop attractive facilities at Fort Ord which best serve the clients which they serve.

The plan elaborates that base conversion goals offer unique opportunities for affordable housing developers and homeless services providers to obtain surplus property and address the needs of the homeless, in addition, to focusing on economic development. It is highly recommended that the foregoing policies be integrated into the Reuse Plan and adopted to facilitate both goals.

Page 4-34 Policies B-1 through H-1: City of Seaside

Objective C: Encourage highest and best use of resident land to enhance and maximize the market value of residential development and realize the economic opportunities associated with redevelopment at the former Fort Ord.

Note remarks above for the City of Marina, these apply for the City of Seaside as well.

The City of Seaside contains ten units of transitional housing granted under Title V of the McKinney Act to the Salvation Army. An additional office facility has been granted to the Housing Authority under McKinney II. This highest and best use and quest for economic development has always been used as a means to attempt to block the transfer of properties within Seaside to the Salvation Army and other McKinney providers. The Coalition and a member agency have been attempting to work with the City of Seaside over the years to begin to plan to integrate the ten units into the City, for the overall benefit of all entities. Note recommendations and Policy's under the City of Marina comments, these comments and recommendations should be included for the City of Seaside, which has a greater number of individuals and families in need of the programs to be offered by the Coalition member agencies. **It is recommended that when a master developer is identified, the Master developer, or the City of Seaside, be required to rebuild the ten transitional housing units acquired under McKinney in conformance with the overall plan for the area. A policy should be developed which would require such action, due to the few McKinney units which are located in Seaside. These ten units should be treated as a component of an Inclusionary Housing program.**

Note comments under the City of Marina with reference to General Plan consistency between land use and housing elements. These recommendations shall be incorporated into the Reuse Plan for the City of Seaside, for the overall benefit of the McKinney programs and to facilitate the economic development of the area, and the low income population which the Coalition member agencies serve.

Policies A- through J-1 County of Monterey

Objective F: Balance economic development needs with the needs of the homeless population in the community.

This objective may be facilitated through the County by the preparation of a County level Consolidated Plan document which will facilitate the provision of funding for a variety of housing and homeless programs into the community which will further economic development. In this time of reduced Federal funding this planning document is extremely important, and with the Reinvention of the U.S. Department of Housing and Urban Development and the implementation of new policies which will direct the manner in which funding will be allocated to communities, the inclusion of this as a Program to facilitate this objective will greatly benefit all programs proposed at Fort Ord. A Policy should be integrated into the Reuse Plan which indicates: ***The County will conduct***

outreach to the homeless services providers and nonprofit low income housing developers to determine unfilled needs within the community which will facilitate the development of a Consolidated Plan by the County.

Senate Bill 899 authorizes FORA to be an impartial intermediary, and have the power to promote the early utilization of property to speed up the process of reuse. The Coalition member agencies now been granted in excess of \$2,500,000 in grants which will facilitate the reuse of Fort Ord and the subsequent economic development of the base. FORA may facilitate the process through mediation and guiding of the planning processes with the Cities of Seaside and Marina, and may foster the grantwriting and funding process at the Federal level.

FORA is also authorized under Senate Bill 899 to establish advisory bodies or committees, to assist in the information process. It is requested that the Coalition of Homeless Services Providers and member agencies serve as an advisory body on housing issues, policies, and homeless services. Almost all of the Monterey County agencies which deal with such issues are members of the Coalition of Homeless Services Providers, and are McKinney Act property transfers. These well known, Countywide agencies are in an excellent position to provide relevant information and advise the Board in such matters. This concept would also fulfill the obligation of integrating the affordable and low income housing component into the overall Reuse Plan, thereby completing a segment of the Plan which is not adequately addressed. It should be noted at this time the following agencies have acquired title to properties and Federal Grants for operation and housing rehabilitation, which will greatly facilitate the economic development of the former Fort Ord:

Properties accessed	Agency	Funding Acquired	Number jobs created
Child Development Center	Children's Services International	1,200,000 Pending: \$483,165	25
56 housing units-Abrams	Housing Authority of the County of Monterey	1,185,000	3 on site jobs and construction related jobs
13 Housing Units-Abrams	Interim Inc.	800,000	3 on-site jobs and construction related jobs
9 Housing Units	Peninsula Outreach	450,000	1 on site job and construction related jobs
23 Housing Units-Abrams	Shelter Plus	Pending: \$470,00	3 on-site jobs and construction related jobs

Please refer to Chart A, attached to this letter, which illustrates the properties acquired by the Coalition of Homeless Services Providers. **It is recommended that this chart be incorporated into the Land Use Plan for the Reuse of Fort Ord with the appropriate policies to facilitate the provision of the appropriate land use designation and zoning which allows the proposed projects by right.**

Circulation Element/Noise Element-

The Reuse Plan pages 4-235 through 4-238 contains policies to assure noise sensitive land uses are not impacted by noise generating projects or incompatible land uses are sited within close proximity to one another. The City of Marina in its review of the Children's Services International, Family Services Center which is an operational child care center (Lease in Furtherance of Conveyance), is requesting that a large area of the site (approximately 1.5 acres which contains an on-site drainage basin) be dedicated for future right-of-way (intersection). There are many problems associated with such a requirement, because the Transportation Plan and Noise Element associated with the Transportation Plan are as yet unadopted.

As for dedication of right-of-ways to accommodate future concepts of roadways which are yet to be adopted and are unknown, the member agencies of the Coalition of Homeless Services providers are not able to dedicate any areas or easements and are subject to the provisions of the McKinney Act. The surveys were attempted to be

14

coordinated with the City of Marina for the establishment of future road rights-of-way. Some of the requests for right-of-way dedication are actually a taking of private property without compensation, such as the requirement which Public Works is attempting to impose upon Children's Services International as a condition of the use permit approval process. This is also contrary to CEQA wherein a public agency is required to perform environmental analysis upon projects for extension of roadways, widening of roadways, or development of large intersections which may cause impacts upon existing land uses. In the case of CSI, the use of the site is existing as a child care center, which is a noise sensitive land use which will be greatly impacted by the location of a large intersection at the boundary of the child care center.

Not only will the Child Care Center site be impacted by noise due to the location of this intersection at this site, it will be adversely impacted by fumes, and dust. The safety of the children will be adversely impacted and other as yet unknown impacts will be associated with the location of an intersection at this site. The FORA plan contains conceptual plans for such improvements, and does not contain any exact location for such an intersection. It is not appropriate to apply such a condition to the use permit process at this time. The City needs to look to alternative means to accomplish certain roadway alignments to avoid the McKinney sites. For all practical purposes, it appears that the City has inadvertently devised a roadway alignment which could make the use of these McKinney sites infeasible.

Additionally, the City is attempting to have Children's Services International bear the burden of upgrading a significant portion of 12th Street to some as yet undefined standards. It should be noted that Streets and Roads Policy A-1 indicated that Fort and each jurisdiction with lands at former Fort Ord shall coordinate with and assist TAMC in providing funding for an efficient regional transportation network to access the former Fort Ord.

The various policies which address transportation alternatives such as pedestrian and bike paths are to be encouraged and welcomed, and will facilitate the village concept which is being designed in the Plan.

While the EIR public hearing process has been extremely controversial, it should be remembered that the County of Monterey has always had a strong community spirit, and has in the past effectively worked together to address many issues. The community contains a strong volunteer base, with strong financial support from local donors and Foundations. The community has collaboratively worked over the years to address many impending problems, including the reuse of Fort Ord. While opinions are often strong, the strengths of the population are diverse and varied. Now is the time to foster collaboration, and initiate the building of non-traditional partnerships such as public and

private partnerships. FORA may serve as a vehicle to further positive negotiation and sharing of resources to address issues on a regional level, instead of the home town self-serving interest level. Only through collaboration and sharing of resources, and working in the real world environment will the vision of the communities impacted by the closure of Fort Ord be a reality over the 50 year planning period. **The community needs to be strongly aware of the impending changes in welfare laws, budget recessions, reduction of Federal Grant opportunities and philosophy of the Federal government to return the prioritization of needs to a local level. If the communities do not plan on a regional level to address these impending challenges, the opportunities to acquire funding, and compete with larger jurisdictions will be lost.** At one time the Fort Ord Reuse Process and associated programs were cited as a National Model for Base Reuse, this Model should be focused upon to foster economic development which is rational, reoccupy existing development, conserve resources, and which will provide upward mobility to families who live and work in the region.

It is hoped that the foregoing comments will be integrated into the various documents to facilitate the development of the programs which were granted under Title V of the McKinney Act. Thank you for the opportunity to comment on the documents.

Sincerely,



Sandra Reeder
Coordinator/Planner
Coalition of Homeless Services Providers

CHART A

AGENCY NAME	PROPERTY TYPE	POPULATION SERVED	SUPPORTIVE SERVICES TO BE PROVIDED
Housing Authority of the County of Monterey	56 housing units- Abrams Park	transitional housing homeless farm workers- families and singles	Referral for day care to CSI; migrant educational, planned parenthood; legal advocacy; community organization for resident empowerment, parenting skills, youth sports and youth activities; alternative employment; referral to community services.
YWCA-Monterey Peninsula	18 Housing Units- Abrams Park 1 Office-12th Street Shoppettee-12 th street	Transitional Housing Program for Homeless women and their children escaping domestic violence Women's Training Center and technical college	Transitional housing for women and their families while receiving training and or stabilization of family income; support groups, advocacy, counseling, day care referral to CSI, employment training, women's business entrepreneurial center; Tri-plex for group housing program for emancipated teen women who have been victims of domestic violence.
Shelter Plus	36 Housing Units- Preston Park	Transitional Housing single females and their children	Case management and referral to existing community services; training in life skills, parenting, budgeting, hygiene, testing for retraining, aptitude, educational opportunities and interests; referral to CSI for child care, latch key child programs on site.
Valley Center	1 office/meeting room- 12th Street	Administrative offices and supported employment for mentally ill and developmentally disabled adults; remedial education for illiteracy	Vocational services to homeless mentally ill and developmentally disabled adults thorough work supported employment and work education, job placement and follow-up.

211-28

211-29

Interim, Inc.	13 housing units- Abrams Park	Transitional Housing and transitional treatment program for single mentally ill adults, office and central meeting room facility.	Residential treatment & supported affordable transitional housing to assist homeless mentally ill adults to transition into the community; job training for mentally ill individuals.
Veterans Transitional Program	Martinez Hall 2 Storage Buildings 42 Housing Units- Patton Park	Intake, eligibility, counseling offices, storage of goods and vehicles, transitional housing for families and adults	Veterans' Self Help Center to provide holistic rehabilitation programs; building of self-esteem; counseling for post-traumatic stress disorder affecting both the veteran and family; drug/alcohol counseling; family counseling; family and marital counseling; benefits assistance, child care referral to CSI; job training and employment referrals.
Children's Services International	12th Street Child Development Center- Family Services Center	Child care for up to 250 homeless children, on site job training center for child care workers	Child care for homeless children from birth to 12 years of age; nutritional program; responsive care-giving program; compensatory education; bi-lingual and bi-cultural programs; recreation and homework assistance; drop in-day care, on the job training for formerly homeless as day care providers and licensing assistance; on site public health nurse; immunization clinic; one stop family resource center.

211-30

<p>Peninsula Outreach</p>	<p>1 barracks & 5 cottages on 12th Street 1 warehouse-10th Street 9 housing units-Abrams</p>	<p>Transitional housing for single males, storage and offices, transitional housing for women and children</p>	<p>Outreach office-case management and goal setting, living skills, employment assistance and referral; child care referral to CSI; personal counseling, drug and alcohol counseling; referral to community resources.</p>
<p>Salvation Army-Monterey Peninsula Corps</p> <p>NOT RECEIVING PROPERTY Food Bank of Monterey County</p> <p>John XXIII Aids Ministry</p>	<p>10 housing units-Hayes Park in Seaside</p>	<p>Transitional housing for homeless families with children</p>	<p>Case management and development of service plans; classes in-money management, living skills, interpersonal relationships, nutrition, parenting, health maintenance; referral to community resources for job training and educational attainment.</p> <p>SERVICES TO BE PROVIDED TO COALITION AGENCIES</p> <p>Food pantry, food for children at CSI, disaster response, job training to Veterans Transitional Center participants.</p> <p>Case management for victims of AIDS for participants of Coalition member agency programs, health counseling; resident empowerment by holistic-spiritual and pastoral counseling; transportation; referral to AIDS clinics; food pantry and referral to community resources.</p>

1000 Rodeo Road
Pebble Beach, Ca. 93953

September 6, 1996

State Senator Henry J. Mello
1200 Aquajito Road, Ste. 102
Monterey, CA 93940

Dear Senator Mello,

I am becoming increasingly concerned about the plans for the development of the Fort Ord property. At a time when we are told that there is a critical water shortage in the area, plans are underway to create a community of up to 75,000 people. If this was a private development it would never see the light of day.

At a time when salt water intrusion is a very real threat to one of the major industries, namely agriculture, plans are being made to further aggravate the problem. I just don't understand what is going on in our community.

In Pebble Beach we have groups of "no growth" citizens trying to limit the Pebble Beach Company's development, but these same people seem to be silent when it comes to what FORA is doing. I don't understand that either.

Isn't there something you can do to slow down the developmental plans of FORA? Is there an Environmental Impact Report available that evaluates the impact FORA's plans will have on the greater Monterey Bay area? Where will the water come from? What are the State's plans for handling the increased traffic? Will the agriculture industry gradually wither away as more and more growth is allowed to take place?

Senator Mello, what is your vision of the future of the greater Monterey Bay? How would you describe it to your grandchildren? I think it is time for elected officials responsible for the the planning of the area to inform citizens what is in store for our grandchildren. It may not be a pretty picture.

2

Sincerely,

John H. Davis

C.C. Monterey County Board of Supervisors
Fort Ord Reuse Agency (FORA)
Assemblyman Bruce McPherson
Congressman Sam Farr
U.S. Senators Barbara Boxer and Diane Feinstein
Governor Wilson



REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
DEFENSE LANGUAGE INSTITUTE FOREIGN LANGUAGE CENTER
AND PRESIDIO OF MONTEREY
PRESIDIO OF MONTEREY, CA 93944-5006

September 4, 1996



Office of the Garrison Commander

Mr. Les White, Executive Officer
Fort Ord Reuse Authority
100 12th Street, Building 2880
Marina, California 93933



Dear Mr. White:

Thank you for the opportunity to review the draft Fort Ord Base Reuse Plan and Environmental Impact Report (EIR). The Reuse Plan and EIR represent continuing cooperative efforts by FORA and the Army in the reuse of the former Fort Ord.

Our comments on the draft EIR are at enclosures 1 through 4 as follows: 1. Comments on Fort Ord Reuse Plan EIR, 2. Comments on FORA Reuse Plan, 3. Comments on FORA Reuse Plan Business and Operations Plan, and 4. Additional comments on Reuse Plan vs. SEIS.

Three Army concerns which appear throughout the Reuse Plan and EIR are the proposed change in the POM Annex boundary, the water supply, and the funding for infrastructure improvements. They are summarized as follows:

1) The projects described in the EIR and in the Reuse Plan are based on a proposed change in the POM Annex boundary. The Army indicated that it is willing to entertain alternative proposals for providing requirements at the Annex. However, no agreement has been reached on a land swap for a change in the POM Annex, nor have the golf courses been transferred. The Reuse Plan and proposed project in the EIR should be modified to be based on the current boundaries of the POM Annex and compatible with property that has been screened for transfer.

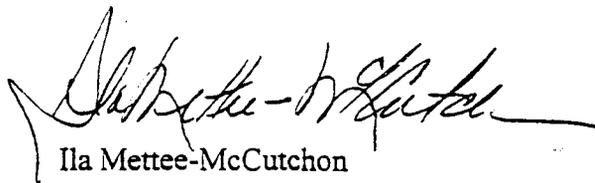
2) The issue of water supply and the need to plan for a replacement water supply for the current allowance of 6,600 acre feet should be addressed in the final Reuse Plan and EIR. Adequate provisions are needed to ensure replacement supplies will be available prior to approval for reuse developments.

3) The Reuse Plan includes an implied assumption that the Army will agree to infrastructure improvements such as funding road improvements and providing rights-of-way. The Army has not agreed to these infrastructure issues, and will be responsible only for the POM Annex.

When the final Supplemental Environmental Impact Statement and Record of Decision are completed, the environmental documentation will be adequate to support disposal under either the December 12, 1994, Base Reuse Plan or the Revised Reuse Plan.

Thank you for your continued cooperation in planning for disposal and reuse of former Fort Ord.

Sincerely,

A handwritten signature in black ink, appearing to read "Ila Mettee-McCutchon". The signature is fluid and cursive, with a long horizontal stroke at the end.

Ila Mettee-McCutchon
Colonel, U.S. Army
Garrison Commander

Enclosures

Copies Furnished

TRADOC BRACO (Mr. Taylor)
Sacramento District Corps of Engineers (Mr. Verkade)
Installation Commander, DLIFLC & POM

COMMENTS ON FORT ORD REUSE PLAN EIR, MAY 1996

1. Page 1, Table of Contents. Section 4.10 begins on 4-115, not 4-113.

2. Page 1-2. The first sentence of first paragraph should be corrected by replacing "Final Environmental Impact Statement (FEIS)" with draft Supplemental EIS or Final SEIS. The FEIS could not have addressed the FORA December 1994 Reuse Plan since it was not available until after the FEIS and ROD were published.

The FORA Reuse Plan/EIR is dependent upon the Army's final SEIS and ROD. These documents have not been completed. Revisions to the SEIS and subsequent wording of the ROD could potentially impact assumptions of the FORA Reuse Plan/EIR.

3. Page 1-2 and Page 1-3. Since the Draft EIR is written as a programmatic EIR it is difficult to analyze specific impacts of the proposed reuse actions. However, the broad or conceptual planning approach allows FORA to evaluate the potential cumulative impacts of reasonably foreseeable activities. The programmatic approach should expedite FORA's preparation of project-specific documents through the use of tiering.

4. Page 3-1, paragraph 3.0, pages 6-16/18, paragraphs 6.4.1 and .2, and elsewhere. The correct acreage for Fort Ord is approximately 27,879 if you count the railroad right of way owned by Southern Pacific or 52 acres less if you do not count the railroad right of way. See Fort Ord survey recorded at volume 19, survey page 1.

5. Page 3-4, paragraph 3.2 and elsewhere. The correct acreage for the military enclave (POM Annex, DFAS and Army Reserve Center) is 805.

6. Page 3-4, paragraph 3.2.1. The proposed project as described here and as shown on figure 3.2.1 assumes the present configuration of the Presidio of Monterey Annex would be adjusted to the east side of North-South Road and that those vacated areas would be available for non-Army land uses consisting of neighborhood retail, medium density residential, golf course and hotel. Note that the area shown for new military housing has up to 35% slopes and much of the area is not suitable for housing construction.

a. A similar proposal was made by the City of Seaside during the development of the Army EIS for disposal and reuse of Fort Ord. The Army indicated that it would be willing to entertain alternative proposals for providing requirements at the annex.

b. The potential for transfer of the two existing golf courses to the City of Seaside was provided for in special congressional legislation. Negotiations have been initiated to determine if an agreement could be reached on the terms of the sale of the golf courses. At this time no agreements have been consummated for either the transfer of the golf courses or the reconfiguration of the POM Annex.

c. The Reuse Plan and proposed project in the EIR should be modified to be based on the present boundaries of the POM Annex and be compatible with lands that have been screened for transfer. The Reuse Plan should assign appropriate reuses for the areas that were described as available for transfer in the first Army real estate screening for former Fort Ord Lands in 1993 and the second Army real estate screening that was initiated in 1996 for the new excess lands. The lands to be transferred by the Army as described in the Supplemental EIS should match the lands planned for reuse in the proposed project. Some of the lands adjacent to the POM Annex have been disposed and the remainder are scheduled for disposal.

d. These lands will not be available to the Army for development of new facilities and are being disposed for reuse. It is important that an appropriate non-Army land use be defined for these areas to serve as the basis for preparing the lands for reuse and conducting real estate appraisals and transfer agreements even if there is a future land swap.

e. It would be appropriate to include an alternative to the present POM Annex that would clearly be dependent on the Army and City of Seaside actually reaching an agreement on the provision of replacement facilities. A reference could be made to the original EIS for discussion of the environmental consequences of an alternative to the proposed project that would provide for environmental analysis of the reconfiguration of the POM Annex.

7. Figure 3.2-1. Some of the boundaries are incorrect such as the Bureau of Land Management, the travel camp and others. FORA approved 3 parcels to go to Caltrans south of the Highway 68 ROW. There are approved PBCs such as part of Reservation Road going to Monterey County shown as Habitat Management Areas. The MOUT is in the wrong configuration and in the wrong location. Recommend you obtain the latest digitized surveyed boundaries from the Army for the final Reuse Plan. Update and corrected digitized boundaries along with revised and more accurate acreage totals should be available in mid-September. 8

8. Page 4-3, Section 4.1.1, Land Use Context, Fort Ord. The plan states about 18% of Fort Ord is developed. If "developed" is taken to mean those areas "that once were disturbed during construction", the area is probably over 25%. If this is an important factor for the EIR, there should be a joint FORA/Army effort to calculate the correct percentage developed. 9

9. Page 4-8, Land Use Compatibility Impacts. The potential land use incompatibilities of the proposed reconfiguration of the POM Annex need to be described in the EIR. The locations of replacement Army facilities (for example the fire station and Burger King) need to be discussed and land use conflicts between existing Army residential areas, other sensitive Army land uses and adjacent private land uses need to be described with appropriate mitigation. 10

10. Page 4-16 and page 4-17. The EIR needs to address the potential incompatibility of the golf course, equestrian center and public amphitheater proposed for the OU2 landfill site. The consistency of these uses with the requirements of the OU2 ROD need to be examined and ROD 11

inconsistencies and impacts identified in the EIR. The SEIS also addresses the requirements of the revised HMP for University of California or FORA to obtain the landfill parcel and to manage 75% of the area as a habitat reserve. The final revised HMP will describe a portion of the area to be managed for habitat by University of California (and if not UC, then FORA). The final EIR and Reuse Plan should address which of these organizations plan to receive the parcel and implement the HMP requirements. UC approval or FORA Board approval of the action should be included for the organization to be designated.

12

The SEIS identifies potential impacts and mitigation related to golf course use at the landfill. Potentially significant impacts were identified with land uses other than non-irrigated open space land uses on the capped landfill. The amphitheater and equestrian center have elements that likely also would result in significant impacts requiring modifications to the completed cap and other mitigation by the reuser. These land use impacts have not been adequately addressed in the EIR. The soil bearing requirements of some of these land uses may not be consistent with the conditions existing at the landfill or the requirements to maintain the integrity of the completed cap. Differential settling of the remediated landfill is expected and has been considered in the design of the landfill cap. The requirements for preventing damage to the liner within the cap and the need for operation of vent systems for the landfill gases, and human health risk impacts need to be addressed for each of the proposed land uses. The requirements for retrofitting elements of the completed cap and the engineering requirements and cost of removing or retrofitting the landfill need to be addressed. The proponent of the proposed revised land uses at the landfill would be responsible for any necessary studies, obtaining required regulatory approvals, and for the cost of modifying the completed landfill cap.

10. Page 4-38. Water Supply. The discussion needs to be corrected as follows:

13

a. The Army/MCWRA agreement allows for pumping of 5,200 acre feet of water from existing Army wells in the Salinas basin and an additional 1,400 acre feet from the deeper, 800 foot aquifer until such time as MCWRA completes a new water project to deliver a replacement water supply.

b. According to the Army/MCWRA agreement, the replacement water supply is scheduled to be available by December 1999. The Army will need to decide whether to participate in the MCWRA replacement water project upon completion of the feasibility and environmental studies. The Army and any other organization who is to continue to use the existing water allotment and replacement water supply will need to participate in the funding for design, construction and operation of the MCWRA replacement water supply when the studies are completed. The Army and others at the former Fort Ord have the option of not participating in the MCWRA project and developing other alternative replacement water supplies. However, the use of the 6,600 acre feet of ground water may not be used after completion of the MCWRA project.

c. The cost, institutional arrangements and environmental impacts of the replacement water supply for the 6,600 acre feet of groundwater need to be addressed in the EIR and financial analysis of the proposed Reuse Plan. The replacement needs to be implemented in support of the first phase of the development.

d. The Reuse Plan does not adequately address the need to participate in the development and replacement of the 6,600 acre feet of water allowed as an interim supply for the Army and for reuse or how this would be financed.

e. On page 4-42, the discussion assumes the 6,600 acre feet of well water supply will be available until the year 2015 to support the first phase and that an additional 11,662 acre feet of water would be needed to support ultimate build out of the proposed project. The long term supply also appears to incorrectly include continued use of the 6,600 acre feet of water from the Salinas basin well after the scheduled 1999 completion of the MCWRA project.

f. The water discussion needs to include a description of how previous mitigations agreed to by the MCWRA and communities during the development and approval of the Fort Ord Disposal and Reuse Coastal Consistency Determinations will be accomplished. These included limitations on development, phasing development based on available water supplies, and the provision of water supplies to coastal dependent land uses on a priority basis. The Reuse Plan and EIR need to describe how these mitigations will be achieved.

g. The extraction and replacement of potable groundwater supplies are of paramount importance. Current hydrologic studies conducted throughout the region coupled with existing precipitation trends indicate insufficient groundwater recharge capabilities to support anticipated demand. The draft EIR indicates an estimated 18,000 acre/feet/year of water would be required to adequately support the proposed reuse as planned. This amount is nearly three times greater than the 6,600 acre/feet/year estimated sustained yield from the Salinas Valley aquifer at former Fort Ord.

11. Page 4-38, last sentence and page 4-42, paragraph 4, line 7. The golf courses are presently Army golf courses (not Seaside's).

12. Page 4-63, last paragraph. The Army has completed several other studies since the Other Physical Attributes Environmental Baseline Study. The RI/FS and DSEIS provide recent information and should be used as references.

13. Page 4-64, Long Term Exposure to Unexploded Ordnance. In general the Army prefers the use of the term "ordnance and explosives" rather than "unexploded ordnance". The second paragraph states that unexploded ordnance on former Fort Ord property is recognized in this draft EIR as a hazardous waste. As described in the SEIS, the Army does not consider UXO to be a

hazardous waste or a hazardous substance requiring a CERCLA response action. Nonetheless, the Army has determined that it will conduct a voluntary CERCLA removal action to address UXO at former Fort Ord in an effort to expedite the cleanup and transfer of former Fort Ord. An example of this is the removal of UXO and physical remnants from previous training areas before land transfer.

a. Lands have not yet been conveyed to BLM. A portion of land has been temporarily permitted to BLM pending transfer. The Site Use Management Plan describes the concepts for use of the inland range portion of the property to be transferred to BLM. Some of the area will have access restrictions.

b. FORA and the public will have an opportunity to review and comment on the Army's proposals for ordnance cleanup in Engineering Evaluation\Cost Analysis reports.

14. Figure 4.6-4. Expected Locations of Unexploded Ordnance at Fort Ord. This figure is out of date. A more recent and accurate map is now available from the Base Realignment and Closure Office. 20

15. Page 4-84. Streets and Roads Policy A-1. Program A-1.1 & 2. The Army's involvement in the funding mechanism for "regional" transportation system development is not adequately assessed. The plan includes an implied assumption that the Army will agree to upgrade existing POM Annex roads to accommodate FORA regional transportation goals. The Army has not agreed to provide right-of-ways to FORA for expansion of selected POM Annex roads. Army funding of these upgrades will require strict adherence to federal regulations and guidelines, and is not guaranteed. Funding mechanisms which do not include the Army should be seriously considered. 21

Specific Army issues include the necessity of upgrading POM Annex roads that are intended primarily for Army use to FORA construction standards (in accordance with Appendix B, Business and Operations Plan of the FORA Reuse Plan); and the reservation of FORA rights-of-way on selected POM Annex roads for future transportation related improvements.

16. Page 4-90. Pedestrian and Bicycles Policies A-1 and B-1. Programs A-1.1 and B- 1.1 &2. 22

The Plan includes an implied assumption that the Army will agree to plan and construct pedestrian and bicycle facilities as part of FORA transportation goals. Like the proposed roadway improvements, the right-of-ways have not been agreed to and Army funding of these upgrades will require strict adherence to federal regulations and guidelines, and is not guaranteed. Funding mechanisms which do not include the Army should be seriously considered.

17. Page 4-96. Air Quality Impacts. There should be a description of air quality impacts, determination of significance and provision of mitigation as necessary to achieve Federal, State and regional air quality goals. Limitations in air emissions may require specific measures or air emission offsets to be included within the Fort Ord Base Reuse Plan rather than being deferred to future EIR's. The Army EIS and SEIS describe potential impacts to air quality that would be significant. Air conformity rule requirements for air emission offsets should be addressed on the air emissions estimated from phased implementation of the proposed project. The AMBAG determination of consistency should be described in the final EIR.

23

18. Page 4-115. Biological Communities. The paragraphs describing the environmental setting of the coastal strand and dune communities gives the impression that the habitat is of very poor quality. Include the fact that the coastal strand and dune communities on former Fort Ord support a significant population of Smiths blue butterfly as well as other listed and proposed species such as Monterey sand gilia, Monterey spineflower, western snowy plover, and the black legless lizard. This habitat is very rare because a significant portion of this habitat type has been lost due to development and agriculture. See page 4-126, Significant Natural Areas.

24

19. Page 4-115. Include the gray fox as well as the red-tailed hawk, red-shouldered hawk, American kestrel, and loggerhead shrike as other species that utilize the disturbed dune areas.

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20. Page 4-116. Coast Live Oak Woodland and Savanna. Black legless lizards have been discovered in coast live oak savanna and woodland habitats during the unexploded ordnance removal activities.

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21. Page 4-117. Riparian Communities. Include a statement that this is potential habitat for the recently listed red-legged frog.

27

22. Page 4-119. Special Status Species. The USFWS has eliminated the candidate categories C1, C2 and replaced with (C). Revise this section to be consistent with this recent change.

28

23. Tables 4.10-1 and 4.10-2. Resources Considered and Not Considered in the HMP. Correct and update the Federal listing status of flora and fauna.

29

24. Page 4-126. 4.10.2 Environmental Impacts and Mitigation. There is a typo in seventh bullet, "HPM" should be HMP.

30

25. Pages 4-126 to 4-143, Biological Resource Impacts and Mitigation. The polygon by polygon descriptions in these pages contain habitat management, protection and monitoring/reporting requirements that are in addition to the requirements contained in the HMP. Polygons 5b and 15 are development areas in the HMP. The EIR also describes habitat management requirements on other development areas within the HMP. The EIR proposed plan should be consistent with the April 1996 agreement for elements of the revised HMP. The habitat reserve, habitat corridor and areas with no HMP requirements should remain as described in the April 1996 agreement, unless

31

other modifications are agreed on by all parties during the development of the HMP revision now in progress. There should be no requirements to conduct additional biological surveys within the development areas of the HMP. The resources within these areas are adequately documented and can be developed without further delay and cost to new landowners to conduct biological surveys. Likewise the requirement to develop detailed plans, budgets or monitoring should not be greater than specified for the specific habitat area in the HMP. While we applaud FORA's commitment to preserve and protect sensitive habitat and natural resources, we are concerned where actions impact Army interests. Increased requirements described for some areas would adversely affect the Army's interests in lands that are to be disposed and would unnecessarily complicate the orderly reuse of properties by new owners. These requirements were addressed during the development of the HMP.

a. The EIR should clarify which of the requirements apply to the party who will receive the property being transferred by the Army and which apply to a governmental body that will be implementing general plans and governmental ordinances for the portions of former Fort Ord within its jurisdiction.

b. For example, City of Marina is the owner of polygons 1e, 1d, and 1b and, as part of the deed covenants conveying the property, has agreed to implement the HMP requirements for these parcels. At this time, polygon 2a has not been transferred from the Army and the future owner is not known. The EIR should not presume that lands will necessarily be transferred to a specific entity unless there is a memorandum of agreement between the Army and that agency for the transfer. The requirement for consecutive annual surveys in Program A-3 is more than required in the HMP for Yadon's piperia, and it is not known whom the parcel will be transferred to (there is not a memorandum of agreement to transfer it to Marina). The spring 1992 surveys conducted for the Army identified an area in the northeast corner of the parcel as having fewer than a dozen individuals. The HMP doesn't require additional surveys. However, the HMP does require the population of the species in the northern parcel to be preserved and vehicle access to the habitat to be restricted to prevent potential impacts.

c. The policy A-4.1 refers to polygon 5c. This is a habitat corridor transferred to University of California by the Army and is required to be managed in accord with the HMP. It is unclear why the City should install barriers to lands not owned by it which are required to be managed by others via the terms of transfer documents from the Army. In this case, the University is planning to install fencing and barriers to protect the resources and allow for management of the area.

26. Page 4-136. 2. Mitigation. It is stated in this section that no mitigation is required because the beach blowouts, disturbed dunes and ice plant mats provide little habitat value. However, these areas do support special status species and the HMP states that no more than 10% of the coastal Fort Ord occurrence of medium- and high-density seacliff and coast buckwheat and Smiths blue butterfly habitat may be disturbed at any one time during lead removal. Although this applies to the Army's lead remediation work, the intent is to protect the endangered butterfly. Therefore, when the California Department of Parks and Recreation acquire a Section 10a take ✓

32

permit, it may require not removing more than 10% of the buckwheat or butterfly habitat during their restoration activities. Recent surveys indicate that there are only approximately 1.25 acres of buckwheat existing throughout the dunes on former Fort Ord. Removal of greater than 10% of the buckwheat at any one time may reduce the wildlife population below self-sustaining levels.

27. Page 5-1, Section 5.1, Cumulative Impacts. The Reuse Plan and EIR state that cumulative demands for public services are not significant. The Army contends that the cumulative affects on existing and proposed resources are significant and can not be ignored. The Reuse Plan assumes that funding mechanisms can be enacted to offset resource shortages in its implementation. Factors which are beyond the scope of the Reuse Plan /EIR documents will impact the Army's ability to meet the assumptions as listed in the documents.

33

28. Page 6-2, paragraphs 6.1.1, 6.2.1, 6.4.1, 6.4.2, etc. There are many acreage totals for PBCs, how many acres are going for different uses, etc. Recommend that the most up-to-date acreage totals be obtained from the Army just prior to publishing the final EIR and percentage reuse types and other such figures be recalculated so that the most current and correct figures are used when possible.

34

29. Figure 6.4.1, No project Alternative Land Conveyances. The figure incorrectly describes the areas for which there are memorandums of understanding. (There are not memorandums for the existing Army golf courses or the Hayes housing area.) The pending PBCs in the figure incorrectly omit a series of the pending conveyances shown on the December 1995 parcel map provided by the Sacramento District Corps of Engineers. The caretaker areas shown on the map should be revised to indicate the PBC applications by City of Marina, Monterey County, CALTRANS, Monterey Peninsular Regional Park District, and Monterey Peninsular College. Also under the no project alternative the BLM NRMA would cover the area shown in alternative 6RM described as NRMA in the ROD for the Army EIS. The Army does not propose to retain the remaining areas in a caretaker status. These areas would be disposed by the Army.

35

30. Page 6-17, first two paragraphs. Revise discussion of the existing golf courses. The special legislation allows the Army to transfer the golf courses to Seaside. Negotiation for sale of the golf courses was initiated but an agreement for sale of the golf courses or the Hayes housing area has not been reached. If an agreement is not reached for the sale of the golf courses to the City of Seaside, the golf courses would remain a part of the Army POM Annex. There is no MOU for transfer of these properties. The Hayes housing area is located outside the POM Annex and would be disposed.

36

COMMENTS ON FORA REUSE PLAN VOLUME 1

37

1. Page 1-3, under paragraph beginning, Appendix B, line 8, change to read "defined by Federal statute and regulations."

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2. Page 1-6, last line on page. Change to read "that govern military base closures and land disposal."

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3. Page 1-7, fourth paragraph discusses EDC. All of these agencies cannot be LRAs. FORA is the only recognized LRA. Last sentence in paragraph discusses sharing of net proceeds. While sharing of net proceeds applies to the two economic development areas being transferred to UC and to CSUMB, sharing is not the policy in DoD Regulation and will not apply to other EDC transfers.

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4. Page 1-7, fifth paragraph, which begins, "At the former Fort Ord, major conveyances consist of..." The Plan needs to clearly say these conveyances are by the Department of the Army.

41

5. Page 1-8, paragraph NEPA/CEQA Compliance. NEPA does not require FORA to prepare an EIR. Line 8, change to read, "...redevelopment agency to rely in part on the Army's Fort Ord Disposal and Reuse...".

Here and elsewhere in the Reuse Plan the correct acreage for Fort Ord is 27,879.4 acres counting 52 acres for the railroad Right of Way (ROW) owned by Southern Pacific.

42

6. Page 1-8. paragraph 3, Habitat Management Plan. Clarify that the HMP is a requirement of the Final Biological Opinion of the U. S. Fish and Wildlife Service on the Army's Biological Assessment for the disposal and reuse of Fort Ord. The HMP is an agreement between the Army and USFWS. The organizations who are to manage habitat reserves and habitat corridors enter into agreements with the Army for the transfer of the property and for implementation of the HMP requirements that apply to the land transferred to them. These agencies are referred to as concurring agencies in the HMP. There are presently eight concurring agencies with habitat management responsibilities in the HMP: Bureau of Land Management; California Department of Parks and Recreation; California Department of Transportation; City of Marina; University of California; Monterey County; FORA; and, Monterey Peninsula Regional Park District. The HMP contains several "Development with Reserve Areas" where there are habitat reserve requirements that apply to a portion of a larger area, such as polygons 8a and 11b. The HMP does not apply to the organizations receiving lands that are not HMP reserves or corridors. The HMP does not specify management goals for the development areas of former Fort Ord and the recipients of these areas are not required to follow management guidelines in the HMP.

7. Page 1-9, next to last paragraph, line 4, change to read "...reuse project chosen among the 1991 round of base closures...". 43
8. Page 1-12, listing at top of page. Why isn't the Monterey Peninsula College District included? (The agency is included in Design Principle #1, page 1-10.) 44
9. Page 1-12, Public Uses at the former Fort Ord, page 3-41 section 3.3.2 and elsewhere. "85% to 86%" listed as land reserved for public use, 62% listed as protected habitat and 8% listed as parks and open space. Recommend at the end of the public review period, the Army and FORA staff compute the latest acreage totals for PBCs, EDCs, federal transfers and other transfers and also compute revised usage percentages so the most accurate figures available are used based on the latest digitized information. 45
10. Page 1-14, paragraph 6, Planning Areas and Districts, first sentence, "...within each of the former Fort Ord jurisdictions...". The meaning of jurisdictions is unclear. Suggest clarifying the reference is to the County of Monterey and cities that would have corporate limits within former Fort Ord. 46
11. Page 1-15, paragraph, Reuse Plan Implementation. Change sentence to read "The strategies for economic recovery from the redevelopment...". 47
12. Page 2-7, paragraph, POM Annex Support for Military. Fort Hunter Liggett closed as an active installation under BRAC 95. Also, line 5 of this paragraph, change to read "...support to the economy through military payrolls,...". 48
13. Page 2-7, paragraph 4, lines 4 and 5, which read, "The final footprint of the POM Annex had not been established at the time of this reports preparation." is in error. The POM Annex was approved 24 August 1994. Also, the last sentence in this paragraph states "...elimination or reconfiguration of the POM Annex are under consideration at the time of this writing." Clarify that none are under consideration by the Army. 49
14. Page 2-7, paragraph 5, Parks, Recreation, and Open Space, sentence that reads "The change in status...presents an additional opportunity...". Where is the additional opportunity? The opportunity exists because of Army ownership and the legislative requirements of the Endangered Species Act. There would be a requirement to protect environmental resources even without a change in status. 50
15. Page 2-26, last line. "Creston" should be "Preston". 51
16. Page 2-27, first paragraph, sentence beginning, "Since conveyance of these units by the U.S. Army is still in the distant future..." 52

The paragraph incorrectly assumes the conveyance of these units is in the distant future. These units are within the area that is available for the EDC and would be available for other transfer mechanisms for private sale if not included in the EDC. The Army has no plans for withholding properties that are available for disposal into the future.

17. Page 2-35, 2.4.1 Base Closure and Realignment Commission (BRAC). This is a misuse of the term BRAC which is the acronym for Base Realignment and Closure. BRAC is also misused in the second, fourth and fifth paragraphs under 2.4.1.

53

18. Page 2-35, 2.4.1. The first paragraph beginning "In 1988, Congress..." should be deleted, it is not applicable to Fort Ord.

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19. Page 2-35, 2.4.1, fourth paragraph, should be changed to read, "Once the President approves the Commission's recommendations, Congress has 45 legislative days to....to complete the closures within six years from when the President submits the list to Congress."

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20. Page 2-36, 2.4.3, paragraph 1, Public Benefit Conveyances. This paragraph is incorrect in stating that PBCs are approved by FORA. "Letters of Interest" from those entities wishing to obtain parcels under either the McKinney Act or PBC were to notify the Army with a copy to the appropriate Federal agency sponsor (in the case of McKinney Act interest, copy to Health and Human Services). In the event two Federal agency sponsors request the same parcel, the Army will make the ultimate decision as to which agency receives the parcel. This decision will be made with input from FORA.

56

21. Page 2-36, 2.4.3, paragraph 4, Economic Development Conveyance, last sentence on that page which reads "However, the LRA must also share any net proceeds from real estate...". This is no longer correct.

57

22. Page 2-37, first paragraph, last sentence. Change to read "FORA will be submitting an EDC application for...not subject to an approved PBC application or McKinney Act."

58

23. Page 2-37, paragraph 3. NOTE: The McKinney Act transfers are not PBCs. FORA is in the process of resolution of multiple requests for 250 additional acres.

59

24. Page 2-37, last paragraph. Last sentence is incorrect. The ROD is a result of the Army NEPA process. Additionally, the Army does not have a preferred reuse plan.

60

25. Page 2-38, first paragraph. NEPA is not applicable to FORA.

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26. Page 2-39, note in margin on Cleanup: Change to read "Successful reuse of the former Fort Ord requires...as designated by this document unless that use is in conflict with other statutes, regulations, or commitments."

62

27. Page 3-14, New Guest Lodge. Clarify that the area west of Highway 1 will be a state park, including the area where the new guest lodge is shown. 63
28. Page 3-15, Residential Neighborhoods with Mixed Housing Types. Problem--the uses shown are not consistent with current ongoing screening. 64
29. Page 3-17, New Neighborhoods. Question: Who is the developer to underwrite costs? Capital? 65
30. Page 3-38, 3rd paragraph, visitors' center acreage is 11.25. 66
31. Page 3-38, BLM Land Management. COMMENT: BLM is more than manager. They will become the responsible Federal Agency--owner. 67
32. Page 3-43, second paragraph, POM Annex. Change to read "Three percent of the lands are being retained by the Army for the housing...". 68
33. Figure 3.3.1. Some of the boundaries shown are incorrect such as BLM, MOU, etc. Recommend at the end of the public review period, the latest digitized boundaries be obtained from the Army. 69
34. Page 3-85 (Bureau of Land Management) and elsewhere. The best guess of land to be managed by BLM is 14,023. BLM acreage has been reduced for the 200/300' ROW along BLM's west boundary and reduced for York School and Caltrans and Monterey county Road ROW parcels. More accurate digitized figures should be available in 45 days. 70
35. Page 3-151 (3.11.4 FORA's Growth Management Principals and Approach). The principles to guide the provision of infrastructure as summarized in Table 3.11-1, Level Of Service Standards, show an anticipated water supply of 268 gal/day average and a wastewater capacity of 175 gal/day average. This provides a difference of 93 gal/day. The Plan does not adequately address where the 93 gallons is used. 71

COMMENTS ON FORA REUSE PLAN VOLUME 2

72

1. Page 4-35 (C-1.2 &3). The Reuse Plan/EIR provides no analysis of future land use development requirements on the POM Annex. The Reuse Plan/EIR is contingent upon relocation of Army housing facilities to Parcel 20c. Other Army facilities including the fire station and Burger King would also need to be replaced in other locations. The Plan does not adequately address a time line nor methodology for this action. The Plan includes an implied assumption that a portion of the POM Annex administrative/commercial will be made available for non-Army development. No time line nor methodology has been discussed regarding the "excessing" of this property to allow for this.

The Plan also includes an implied outcome of the Army's current "Excess II" screening process and does not consider other possible scenarios. These other scenarios may impact transportation and infrastructure components of the Plan.

73

2. Page 4-101. State Highway 1. The text of this paragraph does not relate to Highway 1.

74

3. Page 4-102. 4.2.2.4 Objectives. Paragraph 2. Table 4.2.3 referenced in the fourth line does not note any deficiencies. The last four lines do not constitute a sentence.

75

4. Page 4-143 (E2.3). The landfill cap design has been completed per the Army's program requirements. Design modifications suggested by outside agencies are contingent upon transfer of the landfill parcel and negotiation with the new landowner. Modification costs would become the responsibility of the new landowner and will be subject to HMP and other environmental regulations.

76

COMMENTS ON FORA REUSE PLAN BUSINESS AND OPERATIONS PLAN

77

1. Pages I-5 and II-I. The text references 7 educational institutions that are expected to relocate to former Fort Ord. There is no mention of reference to York School, which is a private high school that is scheduled to acquire approximately 110 acres of land for the purpose of future development.

2. Section IIF, Page II-16 2. Conclusions Regarding Existing Infrastructure. The Plan assumes assignment of infrastructure upgrade cost to the Army for those portions of the infrastructure systems located on the POM Annex. The Army intends to divest itself of all utility infrastructure on the Annex. Once transfer is completed, the Army will fund upgrade costs to these systems, in accord with the agreements governing the transfer of the infrastructure system, based on an assessment for its portion of the overall system. Assessments that are specific to the POM Annex only will most likely not be recognized.

78

a. 3rd sideways triangle. The Army has not agreed to an assignment of storm drainage systems upgrade costs.

b. 4th sideways triangle. The Army has not agreed to an assignment of a proportion of the upgrade costs for the existing water supply and wastewater collection systems.

c. The Plan assumes the availability of 6,600 af/yr of water (current Army allocation). The Army's agreement with MCWRA does not provide for long term use of this water. Once the water system is transferred to a new purveyor, the Army would retain the rights to the amount to provide for POM annex and other DoD requirements only. This figure has been set at 1,729 af/yr by the Army. The remainder of the 6,600 af/yr will require negotiation between the purveyor/agencies and MCWRA. (See also water comments on EIR.)

79

ADDITIONAL COMMENTS ON REUSE PLAN VS SEIS

80

1. There is a discrepancy between the EIR and the SEIS regarding residential land use. The EIR states that 7% will be residential (Table 2.4-1); the SEIS states that 6% will be residential (Table ES-1).

2. Polygon 8a in the Reuse Plan (Vol. 1) is designated as open space/recreation and habitat management and continues to reflect possible use as a golf course (Figure 3.3-1). The SEIS, Alternative 7R has corresponding use, area 8B, designated as planned development mixed use (pg. 3-14, Figure 3-4).

81

3. The Reuse Plan has polygon 17b as habitat management and public facility (Figure 3.3-1). In the SEIS, alternative 7R has area designated as RV Park (page 3-14). They are shaded different; therefore, they are not considered the same. The HMP shows this area as a habitat corridor area, allowing for expansion of the campground facilities in the portion of the parcel shown as Public facility/institutional. The Reuse Plan should designate this area as open space/recreation or other category that would more closely represent the HMP requirement for the area.

82

4. Reference chart below for the following:

83

a. The number of dwelling units in the Reuse Plan exceeds that in the FEIS for alternatives 7, 7R, and 8.

b. The number of dwelling units in the Reuse Plan exceeds that for alternatives 7, 7R, and 8 in the SEIS. The number of employees in the Reuse Plan exceeds the number of jobs for alternative 7R in the SEIS. The number of dwelling units, employees and population in the Reuse Plan are close to those from the EIS/ROD.

	EIS ROD ALT 6RM**	FORA DRAFT REUSE PLAN	FINAL SEIS ALT 7	FINAL SEIS ALT 7R	FINAL SEIS ALT 8
DWELLING UNITS	17,000	17,132*	13,800	15,000	15,000
EMPLOYEES	60,000	45,457	58,500	38,800	48,100
POPULATION	58,000	51,773	41,500	45,000	45,000

NOTES:

* DOES NOT INCLUDE CSUMB

** ROD unit numbers were estimated from EIS data as described in SEIS

APPROVED

MINUTES
Fort Ord Reuse Authority (FORA)
September 13, 1996
4:00 PM
12th Street Gate
Marina, CA

The meeting of the Fort Ord Reuse Authority was called to order by Chair Barlich on Friday, September 13, 1996 at 4:00 PM in the FORA Conference Room, at the 12th Street Gate, Marina, CA.

1. ATTENDANCE

Voting Members in attendance were: Supervisor Johnsen, 1st Vice Chair, Supervisor Karas, Supervisor Perkins, MONTEREY COUNTY; Mayor Vocelka, Councilmember Perrine, MARINA; 2nd Vice Chair Mayor Jordan, Councilmember Mancini, SEASIDE; Mayor Albert, MONTEREY; Mayor Styles, SALINAS; Mayor Pendergrass, SAND CITY; Councilmember Barbara Livingston, CARMEL; Mayor Koffman, PACIFIC GROVE; Chair Barlich, DEL REY OAKS

Ex-Officio Members in attendance were: Dave Borden, 17th CONGRESSIONAL DISTRICT; Charles Van Meter, MONTEREY PENINSULA UNIFIED SCHOOL DISTRICT; Lora Martin, UNIVERSITY OF CALIFORNIA; Hank Hendrickson, CALIFORNIA STATE UNIVERSITY; COL Mettee-McCutchon, US ARMY; Dr. Ed Gould, MONTEREY PENINSULA COLLEGE; Dave Potter, TRANSPORTATION AGENCY OF MONTEREY COUNTY.

Chair Barlich Recommended two changes on the agenda. (1) add resolution of appreciation and commendation to COL Ila Mettee-mCCutchon and (2) move item 5b to 5c and 5c to item 5b.

Boardmember Perrine moved to accept these changes, Boardmember Karas seconded, it passed unanimously.

Boardmember Karas read the Resolution of Appreciation to COL Ila Mettee-McCutchon.

Consent agenda

Item 2c was pulled for discussion.

*go to
NEXT PAGE*

Post-it Fax Note	7671	Date	11/7	# of pages	9
To	ANN	From	SUSAN		
Co./Dept					
Phone #					
Fax #					

Public Comment Period

- 214 Tom May spoke on the process of land transfer from the Army to FORA with regard to unexploded ordinance and toxics. | |
- 215 Ruth Jackson, president of Coalition of Homeless Services Provider read a letter in support of the reuse plan. | |
- 216 Curt Gandy spoke about clearance of unexploded ordinance and the misunderstanding of the public with this process. | |
- 217 ^K Chris Lindstrom would like to see a revised EIR and have a specific plan. | |

Bernice Boyd commented Mr. Gandy has misrepresented himself to the Board.

Debra Mickelson and Linda Anderson read comments on the plan (letter attached). *see # 220*

Sandra Reeder from the Coalition of Homeless Providers read a letter which supports the adoption of the reuse plan (letter attached). *see # 221*

- 218 Laurence Dickey commented on the DEIR, the size of the plan and the comments which will be given to the Board on the plan. | |
- 219 Pete Leonardich commented on his desire for a veteran's cemetery at Fort Ord. | |

OLD BUSINESS

Item 5a - Reuse Plan/EIR: Consideration of the Third Public Hearing Date
Les White reviewed the dates and venues for this hearing. There was general discussion on the dates from the Board members.

Mayor Albert moved to have the date as October 7th at the Monterey Conference Center, Boardmember Karas seconded, it passed unanimously.

Item 5b - Authorize Negotiations for Water System Operations, Maintenance and Ownership with Marina Coast Water District.

Les White reviewed the staff's recommendations and confirmed if these negotiations were not concluded successfully then there would be a recommendation to go with one of the other two firms.

Cal-AM, Cal Water and Marina Coast Water District gave ten minute presentations to the Board.

214, 215, 216, 217, 218, 219

September 13, 1996

FORA
100-12th St., Bldg. 2880
Marina, CA 93922

Verbal Presentation
for Administrative Record
Regular FORA Mtg.-4 pm

Public Comment Period
specplan

Re: 5/31/96 Fort Ord Reuse Plan Draft EIR

To the FORA Board:

Since the release of the Fort Ord Reuse Plan Draft EIR various members of the public have spoken at the public hearings and presented their opinions about the inadequacy of the current DEIR that describes a multi-year reuse plan that includes 22,000 dwelling units, 12 million square ft of office parks, 2 million square feet of retail, 1,800 hotel rooms, 5 or 6 new golf courses, needing 18,000 acre feet of water, 11,000 acre feet of wastewater treatment capacity, and substantial on-site and off-site road construction and/or improvements creating new 4-lane and 6-lane transportation corridors.

The public has repeatedly emphasized that the DEIR is not legally adequate since it fails to disclose the environmental impacts of the project's water systems, wastewater treatment systems or transportation improvements triggered by the proposed project. The lack of full disclosure renders this document meaningless under the California Environmental Quality Act (CEQA).

An attempt has been made in the DEIR and by the authors of the document to tell the public that full disclosure of the project impacts is not needed in the draft EIR because this is a so-called "program EIR" that utilizes "tiering" and that the document is "only a general plan" and, therefore, there is no legal need to adhere to the full disclosure requirements of CEQA.

It is the assertion of the public that the Fort Ord Reuse Plan is a "specific plan" as defined by the Government Code, and is subject to the full disclosure provisions of CEQA. The following is offered for the administrative record and for the consideration of the 13 FORA Board members representing 8 cities and Monterey County, and for the ex-officio members of the FORA board:

Government Code Section 65451 states that a "specific plan" shall include the distribution, location and extent of the uses of land, including open space...proposed distribution, location and extent and intensity of major components of public and private transportation, sewage, water, drainage, solid waste disposal, energy...[and] a program of implementation measures including regulations, programs, public work projects and financing measures necessary to carry out [the above]. [Emphasis added]

Senate Bill 899 created the Fort Ord Reuse Authority board and charged FORA to "...prepare, adopt, finance and implement a plan for the future use and development of...Fort Ord...". SB 899 states that FORA is "...independent of the agencies from which its board is appointed...and the powers and duties granted to the authority prevail over those of any local entity, including any city or county...".

SB 899 states that the "...Fort Ord Reuse Plan shall include all of the following elements: A land use plan for the integrated arrangement and general location and extent of, and criteria and standards for, the uses of land, water, air, space, and other natural resources within the area of the base. The land use plan shall designate areas of the base for residential, commercial, industrial, and other uses, and may specify maximum developed intensities and other standards and criteria. ...A transportation plan for the integrated development of a system of roadways, transit facilities...A conservation plan for the preservation, development, use and management of natural resources...including...soils, shoreline, scenic corridors...open spaces...wetlands...[And] a 5-year capital improvement program [that complies with the requirements of Section 65403]...[And] the program shall include allocation of the available water supply, sewage treatment capacity, solid waste disposal capability, and other limited public service capabilities among the potential development within the area of the base. ...". [Emphasis added]

The draft EIR and accompanying documents released for public review on May 31, 1996, provides the elements described in the Government Code Section 65461 describing the requirements for a "specific plan". The draft EIR provides "aggregate totals" and locations for residential, commercial, tourist facilities and other uses. It provides information outlining the new road systems, it discloses the need for 18,000 acre feet of water and provides a list of alternate water systems. It states the need for 11,000 acre feet of wastewater treatment capacity and provides data on solid waste, energy needs, etc. The DEIR discusses open space. The documents suggest financing mechanisms, etc. The Fort Ord Reuse Plan is a "specific plan" as defined by Government Code and under CEQA.

The public offers for consideration that the Government Code Section 65451 description of a "specific plan" and the SB 899 language describing the requirements for the reuse plan are the same. Therefore, all legal requirements prescribed by CEQA for a specific plan also apply to this proposed reuse plan, and any future reuse plan, that is prepared and adopted by FORA.

To state the obvious, as emphasized in the judge's opinion in the recent Stanilaus Natural Heritage Project/Sierra Club versus County of Stanilaus/Diablo Grande Ltd. Partnership, CEQA requires full disclosure of a project's environmental impacts for a specific plan and, of course, water systems are part of a proposed project, described in an environmental impact report, for a specific plan.

Unfortunately, the present draft EIR for the reuse plan, fails to disclose the environmental impacts of water systems - like the impacts of a Carmel River dam, or a pipeline taking farm water from the Salinas valley, or a desalinization plant, or on-site reservoirs for stormwater, etc. The draft fails to disclose the impacts of a new and/or expanded wastewater treatment plant[s]. And the draft fails to disclose the impacts of the needed on-site and off-site road improvements.

This data needed to be disclosed in the draft EIR so that government agencies and the public could respond to the adequacy of the descriptions of the environmental impacts and the proposed mitigation measures to lessen or eliminate the adverse impacts. There is a legal duty to respond in the final EIR, to all comments received from government agencies, the public, and interested parties during the draft public comment period. There is no such duty, or protection for the public, to respond to any comments made regarding the inadequacy of a final EIR.

Therefore, the public again respectfully requests that the FORA Board requires the preparation of a revised, draft EIR that complies with the requirements of CEQA, and the requirements of SB 899. We again ask that the on-site, safe-yield project alternative, requested during the February 1996 scoping period by the City of Salinas, a FORA member, be included for analysis in a revised draft EIR.

These comments are provided today, so that these and other issues that will be raised by the public, can be discussed at the next public hearing on the current draft EIR. Thank you for your consideration.

Sincerely,



Debra J. Mickelson
dictated and not read
P.O. Box 7591
Carmel, CA 93921
624-8755

cc: CAWS
Grower-Shipper Vegetable Assoc.
Rancho Buena Vista Coalition
Restoration Advisory Board
Sierra Club - Ventana Chapter

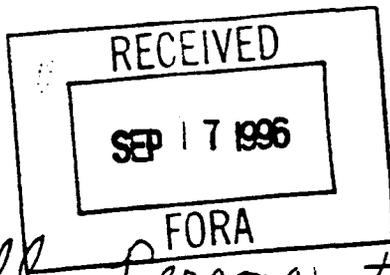
Statement to FORA

Sandra Reeder, Coordinator for the Coalition of Homeless Services Providers which is a 501 (C)(3) non-profit agency comprised of the original eleven agencies involved in the McKinney Title V process acquiring properties at Fort Ord to Serve the Homeless. The mission of the Coalition of Homeless Services Providers is to promote interagency coordination for the establishment and operation of a comprehensive system of housing and support services for homeless individuals and families within Monterey County designed to increase self-sufficiency.

To that end the Coalition supports the adoption of the Fort Ord Reuse Plan which will further the economic development of the region, promote educational resources for the community and provide open space to protect environmental resources.

The Coalition requests that the FORA Board strengthen the polices relating to the development of affordable housing for median and low income individuals and work in partnership to bring federal funding into the community to address many of the issues identified in the Coalition's comments on the EIR, Land Use Plan and Operations Plan. It is requested that the Board consider the suggestions which were submitted by the Coalition. These suggestions will serve to mitigate many of the distrubing social trends which are becomming the norm in our community.

Thank you for the opportunity to comment on the Draft Plan.



7-27-96

To All persons that have something to do with F.O.R.A.

I am writing you today because of a great concern of mine which is very personal to me! It has to do with all the houses and lands that will come up for sale in the next few years. The reason for my concern is that, on T.V. about a month ago, I saw big loads of developers from all over ^{the} state descending on what was Fort Ord, for future opportunities on these houses and lands.

Now before I get into my feelings about this subject, I would like to tell you about myself! I am an electrician by trade. Spent 5 years going to trade school to become an electrician. I've also spent 2 years going to college studying construction technology. I am a very hard working, conscientious construction worker! I make approx. \$35,000 - \$40,000 PER YEAR when there is work! Do you know that I can't even qualify for a \$100,000 house. If you don't know this or not, there aren't any \$100,000 houses! The reason I am writing you today is first and foremost to enlighten you to what it is like to be a working person, and also to voice my opinion, as a tax payer, to what the future of my community will look like!

It seems most of the time in this country, that the only voice that is heard is the "Big money" interest. The average tax-payer never seems to get a fair shake. We are all being manipulated by the powers that be, it seems! I know how easy it must be, for a person or persons to find an easy way out of monumental problems

that confront us. But by giving away our responsibilities as either voters or representatives of those voters, we give away our very foundation of our American society!

What you have on the old Fort Ord property is a great opportunity for all persons of the community to be involved in the future of a great area, owned by all taxpayers, and upon which we have and should have the ability to reap all rewards of the fruits of their labors.

We have a great opportunity to experiment with these properties to find what works best for all people. Some of these things are to stimulate 1st time home ownership, to keep some areas open space, to find ways to recycle some of the buildings that will be demolished, to clean up some of the toxic wastes and future developments.

3

These are just some of the Ideas or experiments that can be accomplished with some courage and foresight. One of my fears is that the persons that have the power, will give all of the possibilities away by just selling all of the lands to developers for the highest price. Please remember the developers are in business for one reason, to make money! They are not & will not be the God send to all the problems that will confront us on the Old Fort Ord. Thank you for your time!

Duane Foster
(RENTER) Salinas, Ca.

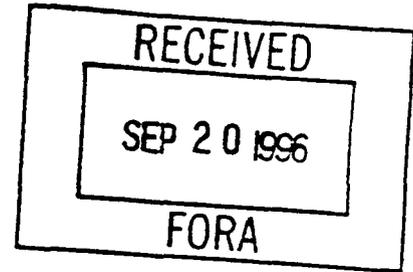
18508 Northridge Dr
Salinas CA 93906

MONTEREY COUNTY FARM BUREAU

Serving Monterey County Agriculture Since 1917

September 19, 1996

Les White, Executive Director
Fort Ord Reuse Authority
100 12th Street, Building 2880
Marina, CA 93933



Dear Mr. White:

The Monterey County Farm Bureau appreciates the opportunity to comment on issues of significant interest that are contained within FORA's Reuse Plan for the former Fort Ord property.

Circulation and Transportation

This area is discussed at length in the public review documents, and is of great importance to the local agricultural community. Plans and discussions about the "Westside Bypass" in the Salinas area have been around for many years. The Fort Ord Reuse Plan discusses this proposal as well. The agricultural community has been resolute in its opposition to this concept for years, and remains opposed to it. As described in the FORA plan, this roadway would link North Salinas with Fort Ord by a fairly direct route—that route would be directly through the most valuable agricultural lands within Monterey County—known as the Blanco District—and would render hundreds of acres of prime farmland unusable. This is not acceptable. Farm Bureau, on behalf of the County's agricultural interests, continues to oppose any plan which include the "Westside Bypass" or any proposed roadway system which would eliminate productive farmlands.

Widening of the Blanco/Davis corridor is discussed, and agricultural property owners have been talking with the County's Transportation Agency (TAMC) regarding the opportunities for widening these important transportation corridors.

Farm Bureau has asked about conveyances from the federal government which would provide for transportation improvements necessary for base reuse proposals. Among the concerns regarding these conveyances is that CalTrans has indicated that the BLM properties are being tightly held, and the most logical alignment for a Highway 68 bypass is not available because it happens to be within the property designated for BLM. We recognize that a right-of-way has been preserved, but it is our understanding that it is not CalTrans' preferred alignment for the 68 Bypass. Publicly-owned lands—such as BLM lands—should be first in line for public benefit projects. While the BLM lands are slated for habitat and mitigation purposes, they must not be considered "sacred" to the detriment of the public benefit needs identified in the reuse of Fort Ord.

Our last comment on transportation issues would be regarding proposals for funding. There are many options discussed in the Reuse Plan to fund the transportation needs identified within the Plan. Developer fees, so long as there is a direct correlation of benefit, should be pursued. We raise a question as to the direct correlation of benefit to areas outside of Fort Ord, should developer fees be implemented in those areas. We oppose the idea that all county residents should pay to provide roadway improvements necessary for the reuse of Fort Ord when not all county residents are benefitted by those improvements. A recent TAMC study indicates that more than \$800 million will be needed for transportation improvements for base reuse. The community at large cannot fund such massive improvements without state and/or federal monies, and the challenge for FORA is to find state/federal transportation funding to meet these needs.

223-1

Lee White, Executive Director
Fort Ord Reuse Authority
September 19, 1996
Page 2

Land Use and Conveyance

We have already addressed the issue of transportation-related conveyances. Other land use issues of concern would be the availability of low and moderate income housing on-base. The state has requirements for the development and placement of affordable housing, and Monterey County is on record as being very supportive of providing affordable housing for county residents. We notice that there is no provision for affordable housing areas within the Reuse Plan. We can only conclude that this must be an oversight, since affordable housing is such an important and high-profile issue locally. We are confident that this will be addressed, and provisions made, in the final approved Reuse Planning documents. 4

Water Use

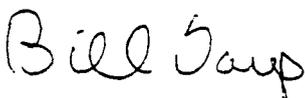
As with any other development proposals within Monterey County, water use and availability must be seriously and deliberately considered. The total of proposed uses for Fort Ord lands, and the water demands that they would generate, far exceed the water which is actually available for those uses. All proposals must be scrutinized with respect to water use, some may need revision or scaling-back, some may need elimination altogether. Farm Bureau is not in the position to make such a judgement call; however, FORA is, and must. The University has already indicated that they will have to scale-down their expansion plans and the eventual FTE population will be somewhat less than originally anticipated. We applaud their lead on this issue, and expect others will have to follow. Realism must come into play, and water pricing and availability may be the catalyst to make this happen. 5

Existing Communities

We notice that there have been no studies done which would evaluate the impacts of Fort Ord reuse on the existing surrounding communities. Thousands of people are expected to live and work on the former base. How will their presence impact adjacent communities? Will businesses leave Salinas to go to Fort Ord? Will larger, "big box" type superstores, geared to serve Fort Ord reuse populations, force mom-and-pop stores to go out of business? The real estate market is already in trouble; what impact will available housing at Fort Ord have on that market throughout the County? 6

Farm Bureau recognizes that there are many opportunities available as the former Fort Ord is transformed into a civilian-use facility. We also recognize that our existing communities and citizens must be treated fairly in the process of base reuse. We applaud FORA on trying to meet the challenges which it faces, and encourage your consideration of our comments.

Very sincerely,



Bill Tarp, President

Ken. W. J.

AG
10-18
PIT

Dave Dansky
Malena Hasbun
74 Middle Canyon Road
Carmel Valley CA 93924-9404
(408) 659-0909

00-0-198

September 28, 1996

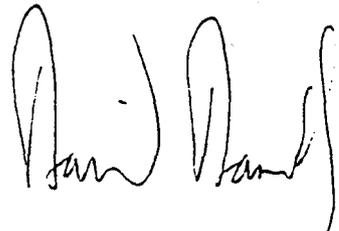
Hon. Sam Farr
1216 Longworth Bldg.
Washington DC 20515

Dear Representative Farr,

This is regarding the Ford Ord Reuse Authority and the draft of the Environmental Impact Report it presented last May. The report appears to emphasize economic recovery at the expense of the environment. If I understand it correctly, it projects an extra 72,000 people, 22,000 housing units, 12 million square feet of office and industrial parks, etc. Most importantly, it encourages land sale to private developers and requires 18,000 acre feet of water, of which only roughly 6000 exist on site. This is a little outlandish in this region chronically plagued by water shortages!

Please write or call me with your thoughts on the EIR draft, as I can't help but wonder if it needs to be completely revamped. If it's easier, as I'm sure you are swamped with mail like this, e-mail me at:
73720.441@compuserve.com

Sincerely yours,



See. upel

Frances L. Fox, 680 Jessie Street, Monterey, CA 93940-2013 408-373

Sep 28, 1996

MF
10-18
OIT

OCT 1 1996

Hon. Sam Farr
1216 Longworth Building
Washington, DC 20515

Re: Fort Ord Hyperdevelopment

Dear Congressman Farr:

The economic conversion of Fort Ord seems to be getting way out of hand and, if not checked, will seriously jeopardize the way of life unique to and treasured by this beautiful area. I am asking that you

- . recognize that the FORA DEIR is a fatally flawed document.
- . demand a new DEIR - not a scaled back revision of the current one.
- . create a realistic plan that uses on-site, safe-yield water and gives us
- . full disclosure of environmental impacts.

Thank you for your attention,

OCT 10 1996

Frances L. Fox
Frances L. Fox

cc: Hon. Bruce McPherson
Fort Ord Reuse Authority

Ft Ord Reuse Plan/EIR Comments.

To FORA

From W. C. Woodworth, Aquanet Systems,
654 Sunset Dr. PG 93950

9-30 96

Foreword:

I have written much the past several years on the environmental issues surrounding and including old Ft Ord. However for this exercise, let me just cover a few key issues which may help in the final approval of this DEIR. I have concentrated on the water related issues of water/sewage, drainage, issues and projections into the future for 3 or 4 four decades.

Specifics related to the 33 page Executive Summary of May 1996:

* pages 10-11 Comparison-key impacts

The water supply nos. -need for local water thru the five options

are interesting and reasonable for comparison purposes. However, I have to caution the analyst that these numbers do not reflect other than probable ground water extractions and also little or no water conservation and energy conservation factors considered.

The required water, for all purposes on the base , not drinking water only, should spell out the amount of well or ground water needed but also the recycled sewage and storm water managed at insitu locations. My estimates are that recycled water and strong water conservation program must generate at least an equal amount of well water given suitable economic incentives.

These numbers in the tables need to clarified and projected in 5 year increments out to a reasonable planning target at least past 2025. Otherwise, more flak will come from the no-growthers and obstructionists to cause expensive delays for any reasonable growth on the old fort.

p 2-11

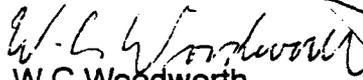
The storm drainage impact issue is a bit fuzzy and possibly misleading to many . Stormwater management on the Clean Water Act of 1972 has very specific best management practices for cleansing the urban runoff waters and for converting much of such waters to financial benefits, replacing more expensive potable or bottled waters.

Why restrict this Stormwater drainage, including flood potentials, to only 8.701 acres.? When it rains over the Fort, all 28,000 acres receive natural desalinated water from the skies. often generating 40-60,000 acre feet annually regardless what political jurisdiction owns the surface below.

The hydrology and water quality of available waters to the Fort or too nebulous a concept as depicted earlier. A better understanding could be emitted to readers if the major functions of these water related utilities: water/sewage/drainage and recycled Superfund waters could be considered under a infrastructure subject subset called aquastructure or shorter- Aquanet systems. Water storm water managing , sewer/rates and reuse of superfund toxics cleanup can be a compact packet for funding and managing such water related utilities involved.

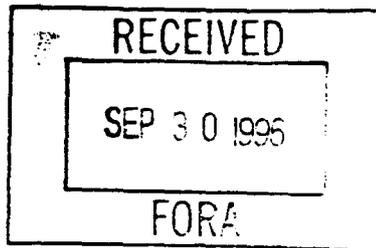
It is sad to believe that 62% of the old Fort, in this EIR planning will not contain any, or sufficient surface water storage and reservoirs for the mass of geography involved, **into perpetuity**. There just has to be a better management process in those acreages under BLM and St.Parks.

p 2-20 proposed monitoring mitigation plan does make a stab at trying to establish a "program" of documenting procedures but I don't understand why only 3 political units have the chore and not all FORA policy makers. Further, it does not recognize that a possible role could be done better and cheaper **by privatizing** all or most of the water utilities networks,


W C Woodworth
654 Sunset Dr.
Pacific Grove CA 93950
408-373-4644

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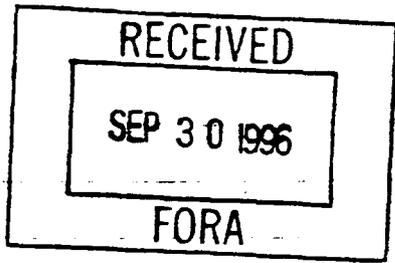


9/25/96

Dear Program Manager,

We received a letter from our neighbor Larry Hampson regarding a proposal for a right of way extension for California Avenue. We (my wife and I) live at 3001 Concord Ct. Our lot would be abutting the right of way ^{way's} with zero set back. There are also plans for a road to intersect California Avenue on the south boundary of Marina. This intersection would be directly behind our backyard. We don't want to see this happen. We value our peace and quiet in our neighborhood. Our house would have the most impact at this intersection. We are completely opposed to this intersection. We feel that for many years people have found their way to Fort Ord without inconvenience. We would like FORA to seriously consider the impacts and options of proceeding with this intersection. We feel that the I mjin to 12th street is the best solution. In conclusion, this is a "not in our backyard" situation for us. We would hate to see it a "no win" situation also.

Sincerely Concerned Citizens,
Michael Bailey
Debra Bailey
3001 Concord Ct, Marina Ca.



RT. 1, BOX 93
CARMEL, CA 93923
SEPT. 28, 1996

FORT ORD REUSE AUTHORITY
100 12TH ST., BLDG. 2880
MARINA, CA 93933

RE: THE DRAFT EIR FOR THE FORMER FORT ORD.

DEAR FORA,

I CANNOT IMAGINE A MORE SEVERE IMPACT
ON THE MONTEREY PENINSULA THAN THE
PROPOSED 72,000 PERSON CITY AT FT. OR

WATER IS MY MAIN CONCERN; BUT AIR,
TRAFFIC, AND LIFE STYLE CONCERNS FOLLOW
CLOSE BEHIND.

A PROPER EIR WITH FULL DISCLOSURES
AND COMPLETE PUBLIC AWARENESS IS
IMPERATIVE.

A DEVELOPMENT MORE CONSISTENT WITH
THE PENINSULA'S CONSTRAINTS AND RESOURCE
SHOULD BE CONSIDERED.

SINCERELY,

Lana Price

LANA PRICE

del. up

Meighan O'Brien
Route 1, Box 105 315 14th St.
Carroll, California 93923 P.O. CA 93950

Hon. Sam Farr
1216 Longworth Bldg.
Washington, D.C. 20515

5 MG
10-18
DH

September 30, 1996

Honorable Congressman Farr,

I am writing to urge you to intervene on behalf of local residents to the Fort Ord Reuse Authority regarding its current Draft Environmental Impact Report.

This Report goes beyond the scope of the four objectives legislated to ~~be~~ by state Senate Bill 899. The Report is severely flawed in its gargantuan growth projections and the limited information it offers on the environmental impacts of these projections.

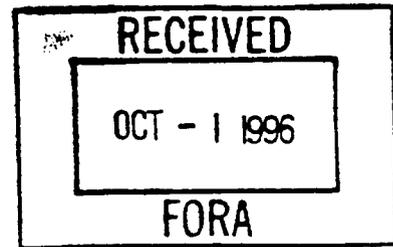
We need a new, completely revised DEIR, not just an amended report. Please exercise your authority and bring some sanity to this extremely important process. Thank you.

Sincerely,

Meighan O'Brien

cc. Bruce McPherson

229



Tamara Harris
10175 Sunstar Road
Monterey, California 93940

September 28, 1996

Fort Ord Reuse Authority
100 12th. St. Bldg. 2880
Marina, CA. 93922
Re: FORA DEIR

Dear FORA,

I have attempted to keep up on the proposed development of what used to be Fort Ord. However, I have become alarmed over and over again by the kind of numbers that are cited as future development plans in the DEIR submitted to the public.

We moved 18 years ago to Monterey because it was a medium sized community and unlike other parts of California was able to retain its special qualities.

When the State Senate created FORA, there were several main objectives, and there are several of them that I have great difficulty in reconciling as being implemented under the current plan.

One of the objectives is to **enhance our environment and quality of life**. There is no way that anyone can justify doubling the size of the Monterey Peninsula as enhancing our environment or quality of life. And where will the new water come from? Anybody who lives in the area realizes there is a **water shortage** and the DEIR certainly does not address an **adequate** solution to that problem. What about **seawater intrusion**, what about **wastewater**, why do we need **45,000 new jobs**? Especially low paying service industry positions. Those jobs won't attract my daughters to work and live here after graduating from college. That will only increase the need for more affordable housing of which we don't have enough.

If you read letters to the editor, concerned citizens continually write about the issues that have not been adequately addressed in the DEIR. No one writes about how complete and accurate it is. The DEIR that has been submitted has a great many inadequacies and **needs to be completely revised**.

This is not the economic conversion I had in mind for Ft. Ord.

Sincerely,

Tamara Harris

CITY COUNCIL
SANDRA L. (SANDY) KOFFMAN
MAYOR

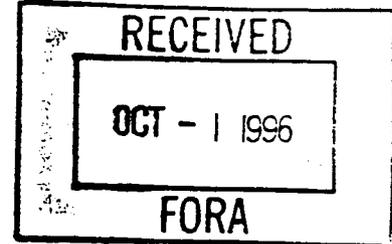
E. (BOB) DAVIS
DON
CE B. ZITO
STEVE HONEGGER
ROBERT HUITT
JAMES W. (JIM) COSTELLO



CITY OF PACIFIC GROVE

300 FOREST AVENUE
PACIFIC GROVE, CALIFORNIA 93950
TELEPHONE (408) 648-3100
FAX (408) 375-9863

MICHAEL W. HUSE
CITY MANAGER
PETER WOODRUFF
ADMIN. SERVICES DIRECTOR
CITY CLERK AND TREASURER
GEORGE C. THACHER
CITY ATTORNEY



September 30, 1996

Les White

Executive Director

Attention: Ann Hebenstreit

Fort Ord Reuse Authority

100 12th St. Bldg. 2880

Marina, Ca. 93933

RE: DRAFT FT. ORD REUSE PLAN

Dear Mr. White:

Please accept my comments on the Draft Ft. Ord Reuse Plan attached to this cover letter. These comments will also be part of the information packet presented at the October 2nd Pacific Grove City Council meeting. The comments are a result of my work as Chair of the Pacific Grove EIR Committee.



Sincerely

Terrence B. Zito

Pacific Grove City Council

231-1

MEMORANDUM

TO: MAYOR AND CITY COUNCIL

FROM: T. B. Zito

SUBJECT: COMMENTS ON THE FT. ORD DRAFT EIR

DATE: 9/23/96

The first part of these comments concerns water issues, the second part will concentrate on general comments and questions.

WATER ISSUES

Five or six new golf courses are planned on the former base; what is the typical water usage for one golf course?

Revised DEIR should provide more detailed breakdown of projected water useage for residential, commercial, visitor serving, and recreational segments for the life of the plan.

Draft EIR does not have an in-depth analysis of the hydrology of the former base. An exhaustive study should be done by an expert in the field. Exhaustive data is needed to back up assertion that 6600 AF of water is available on base for this development.

Draft EIR should provide detailed accounting of historical usage of water on base during the Army period, as well as current water usage; 3000 AF has been mentioned at Public Hearings as the figure for current water useage on base. Is this a reliable figure?

What is the status of the on -base water delivery system? Pervasive leakage problems with this system have been asserted at Public Hearings. Is this the case?

GENERAL COMMENTS

The Ft. Ord Reuse Authority Act required FORA to accomplish the following:

- a) To facilitate the transfer and reuse of Ft. Ord with all practical speed;
- b) To minimize the disruption caused by the bases closure on the civilian economy and the people of the Monterey Bay area;
- c) To provide for the reuse and development of the base area in ways that enhance the economy and quality of life of the Monterey Bay community; and
- d) To maintain and protect the unique environmental resources of the area.

I have prepared comments for b), c), and d)

- b) Revised Draft EIR should provide exhaustive documentation to prove that the cities of Seaside, Marina, Del Rey Oaks, Sand City, Monterey, Pacific Grove, and Carmel and Monterey County have suffered significant disruption on the "civilian economy". Statistics should include property tax, sales tax, yearly revenues and expenditures, tot revenue, and unemployment rates. These statistics should cover the period of the height of Army activity on base up to fiscal year 95/96.
- c) An adequate case has not been made by the present DEIR that this plan "enhances" the "economy and quality of life of the Monterey Bay community".

A major component of our economy is based on tourism. Tourists come to our area to enjoy its natural beauty. Degrade this environment with traffic grid-lock, air pollution, water rationing, and a blighted viewshed, and visitors will go elsewhere.

d) How will this massive development "maintain and protect the unique environmental resources of the area"?

7

The region already faces a water crisis. According to Cal-Am Water, water rationing is in our immediate future. Salt-water intrusion threatens the Ft. Ord aquifer, as well as that of Salinas. 70,000 new people could cause massive problems with water availability and quality.

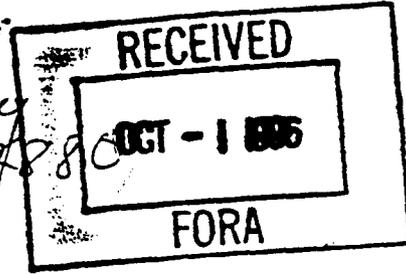
Air pollution, as well as a huge increase in sewage production could drastically impact our "unique environmental resources". A revised Draft EIR needs to provide a more compelling case to support statement d)

Finally, the Revised Draft EIR should include a project alternative that would restrict overall reuse of the base to on-site, safe yield water.

8

September 30, 1996

Fort Ord Reuse Authority
100 12th Street, Bldg #280
Marina, CA 93922



Dear Members,
I am writing to urge you to develop a completely revised Draft Environmental Impact Report. The current Report projects a level of growth that cannot be sustained by current water or traffic conditions.

The Report also extends the scope of the objectives that you were granted by state Senate Bill 899. You were not granted legislative authority to accomodate regional growth or to develop an economic/employment recovery.

Please keep the entire community interest in mind when you rewrite a DEIR for Fort Ord Reuse. We do not need to create a new city in Monterey County, we have plenty of cities already. What we

need use supplemental services that will enhance our current structures.

We do not need new golf courses that will further deplete short and precious water supply.

I am writing to Congressman ~~Law~~ to intervene in their process so you will get back on track and design a plan that is faithful to the original objectives for Fort Ord Reuse.

Sincerely,

Meighan O'Brien

315. 14th St

Pacific Grove CA 93950

deir: upd

(S) MG
10-18
DIT

Dear Sam,

OCT 0 - CCS

10-1-96

We hope you will help the
 FCRA Board understand they ^{are} way
 off base with the Project DEIR. They
 need an adequate document and
 need to plan an environmental project -
 not something that will destroy any
 evidence of quality of life that we
 now enjoy.

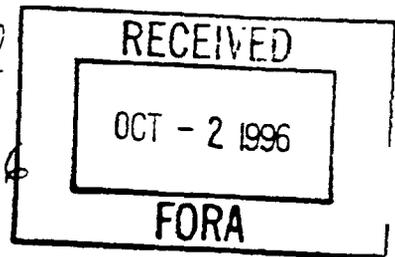
Sincerely, Sandra and
 Steve Smith

Sandra Smith

6 abinante way

Mont. CA 93940

24379 Potlata Road
Carmel, CA 93923
September 30, 1996



The Honorable Sam Farr
1216 Longworth Building
Washington, D.C. 20515

Dear Representative Farr: this letter is
an apology for writing this letter in
so hand, but my old portable typewriter
is broken and I have not entered the
world of computers.

FORA's plan for the conversion of Ft. Ord
is such a grandiose monstrosity that
I have trouble understanding how it
could be a serious proposal. State
Senate Bill 899, which created FORA,
lists its main objectives:

1. to facilitate the transfer and reuse
of Ft. Ord.
2. to minimize economic disruption
to the area
3. to enhance our environment and
quality of life.
4. to maintain and protect our en-
vironmental resources.

The FORA DEIR is not compatible with
these objectives or with the California
Environmental Quality Act. It seriously
stresses our existing industries,
tourism, and agriculture. It raises
many questions without answering
them.

One of the most worrisome questions has to do with water. The project requires 18,000 acre feet of water, of which only $\frac{1}{3}$ exists on site. Where will that water come from? What happens when the new demands exceed the capacity of our wastewater ~~plant~~ ~~for~~ ~~badly~~ ~~flawed~~ ~~by~~ the FORT ~~plan~~ ~~for~~ ~~badly~~ ~~flawed~~ ~~by~~ that I ask you to demand that it be completely revised, not just tinkered with. Please insist that FORT produce a realistic plan that uses on-site, safe-yield water, and gives us full disclosure of environmental impacts.

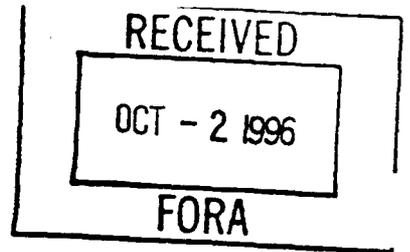
Sincerely yours,

Biscilla Kestell

Copies to:

The Honorable Duce McPherson
St. Ord Resource Authority

ROBERT GREENWOOD
Mineral Resources Geologist



8240 El Camino Estrada
Carmel, California 93923
(408) 625-5316

Calif. Reg. Geologist No. 3196

Sept. 28, 1996

Representative Sam Farr
1216 Longworth Bldg.
Washington DC 20515

Fort Ord Redevelopment - Draft EIR

Dear Sam Farr:

The current DEIR for Fort Ord proposes a project which is totally unrealistic, and it fails to recognize major adverse impacts on the Monterey Peninsula.

According to State Senate Bill 899, the main objectives of the Reuse Authority (FORA) are:

1. Facilitate transfer & reuse of the Army base.
2. Minimize economic disruption
3. Enhance our environment and quality of life.

The current DEIR is a classic overkill, projecting economic and population growth far in excess of compensating for the departure of the Army, a loss which has been assessed by a Rand Corporation study (funded by the Pentagon). By envisioning a growth rate five times the historic record for the Monterey Peninsula, this DEIR has misused State and Federal funds to prepare a plan which is contrary to the intent of SB 899.

CEQA requires that an EIR make "full disclosure of the impacts of a stable, finite project", but this DEIR ignores the negative impacts on environment and quality of life inherent in adding 72,000 people and their vehicles to the Monterey Peninsula. In this water-short region, it creates a demand for 18,000 acre-ft. of water, whereas only about 6,000 are available. It envisions \$800 million for roadways, without demonstrating how such an amount could be obtained.

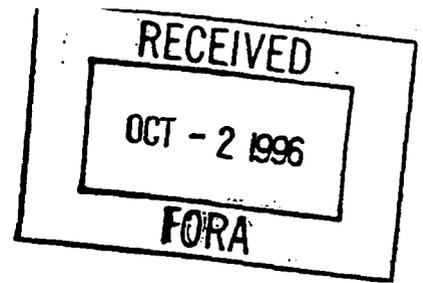
The number of unaddressed impacts is too long for me to list here. Touching up or "correcting" this DEIR will not suffice. People on the Monterey Peninsula want to see a completely revised EIR which will:

1. Achieve a level of development commensurate with compensating for the Army's withdrawal.
2. Use no more water than can safely be obtained on-site without prejudicing surrounding uses.
3. Make full disclosure of all adverse impacts to the quality of life in this unique, scenic area, including the National Marine Sanctuary.

Thank you for your attention,

Robert Greenwood

copy: Assemblyman Bruce McPherson
: Directors, Fort Ord Reuse Authority



9/30/96

Hon. Sam Farr
1216 Longworth Bldg
Washington, DC 20515

Dear Honorable Farr;

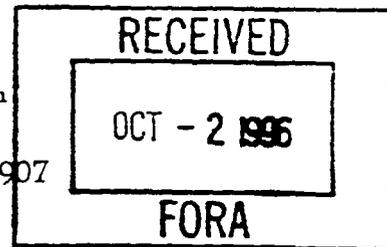
I am writing you out of my concern with the FORA project DEIR. This is not the kind of economic conversion that I had in mind for Fort Ord. The project, as proposed, is not compatible with the original FORA objectives or with CEQA, and I believe it seriously jeopardizes our existing industries of tourism and agriculture.

Please take a stand and tell the FORA board that the DEIR is a fatally flawed document and needs to be completely revised (not just scaled back). And let them know that ~~we~~ they need to formulate a realistic plan that uses on-site, safe-yield water and will give us full disclosure of environmental impacts.

cc: Hon Bruce McPherson
cc: Fort Ord Reuse Authority
236

Sincerely,
Shirley Jones
1193 4th Street
Montreay

Laura E. Pinkerton
66 Lynne Lane
Salinas, California 93907



Dear Board Members:

Please stop the current DEIR
from being finalized.

Your use plan is not what
most peninsula residents have
envisioned and it will jeopardize
our culture and life-style if implemented.

Please formulate a more realistic
plan. Assure us that this new
plan will use on-site water in
safe amounts and that the growth
from this plan will be slow enough
not to disrupt our life-style.

Thank you,
Laura Pinkerton

postmarked Oct 2

4629 Los Altos Dr. Pebble Beach, CA. 93953

— (5) MG
10-18 Sept 30, 1996
D.H. del. 4/96

Hon. Sam Farr

1216 Longworth Bldg. OCT 01 1996
Washington, D.C. 20515

Dear Sam:

Just as I was beginning
to feel good about Ft. Ord
I had an alert from 20/20
vision to the effect that
the Bear is fatally flawed.
Although the Rand Corp
says that the base closure
had little impact on the
economy here, I don't see

how this can be as time goes on. Over the space of a lifetime the size of the Peninsula economically speaking is doubled, with a 72,000 city, 22,000 housing units, 12 million sq. ft of office and industrial, 1800 new hotel rooms and 5 new golf courses

The DEIR does not say where the water will come from (only $\frac{1}{3}$ on site). But what about waste-water? There are many more questions not answered by the DEIR.

The DEIR must be completely revised.

Please notify me to finalize the revised.

The FORA board DEIR. It must be
Sincerely,
Mary Ross

deiv. uph

250 Forest Ridge Road #13
Monterey
California 93940

Tel: 408.375.5957

Fax: 408.375.2228

E-Mail: BJTrist@Aol.com

To: Hon. Sam Farr

From: Beulah Trist

Date: 10-2-96

*(S) MG
10-18
D H*

I am writing to add my voice to those of the many people concerned with the situation regarding the FORA project.

Please send a strong message to the FORA board demanding a totally new DEIR, not just a cutting back of the current document.

They should recognize that the current document cannot be revamped.

What is needed is a down-to-earth plan that will not make further demands on our water resources and that will give an accounting of the total environmental impacts.

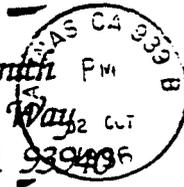
Thank you.

Beulah Trist

Hon. Sam Farr
1216 Longworth Bldg.
Washington
DC 20515

cc: Hon. Bruce McPherson
Fort Ord Reuse Authority

Sandra Smith
6 Abinante Way
Monterey, CA 93940



Fort Ord Reuse Authority
100 12th St., Bldg 2880
Marina, Ca.

93922

USPS 1996

RECEIVED

10-1-96

OCT - 3 1996

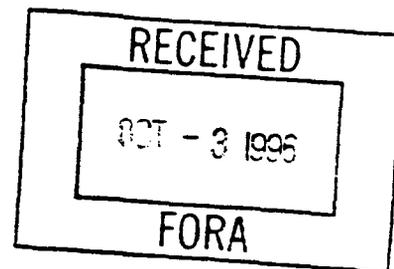
Fora:

FORA

We are asking for a quality DEIR that addresses safe-yield water, funding for infrastructure, improvements, and environmental concerns in general. The impacts have not been addressed.

Sandra and Stanley Smith

Barbara J Baldock
1330 Castro Court
Monterey, CA 93940
408-649-1336
FAX 408-649-8059



October 1, 1996

Ft. Ord Reuse Authority
100 12th Street, Bldg. 2880
Marina, CA 93922

Dear FORA:

The FORA DEIR is a fatally flawed document and should be completely revised. A realistic plan should be formulated that uses on-site, safe-yield water and gives us full disclosure of environmental impact.

The proposed population of 72,000 is much larger than it should be, requiring 18,000 acre feet of water, of which only one third exists on-site.

The California Environmental Quality Act (CEQA) requires that an EIR be a "good faith effort at full disclosure of the impacts of a stable, finite project description." The FORA DEIR fails to tell us the impacts of virtually everything from height limits to sea water intrusion to unexploded ordnance. What about the availability of water and the impacts of increased traffic on the Monterey Peninsula?

Please support a revised DEIR.

Sincerely,

A handwritten signature in cursive script that reads "Barbara Baldock".

Barbara Baldock

CITY HALL
BOX CC
CARMEL-BY-THE-SEA, CALIFORNIA 93921

2 October 1996

VIA FACSIMILE TRANSMISSION
883-3675

Mr. Les White
Executive Officer
Fort Ord Reuse Authority
Building 2880
100 12th Street
Marina CA 93933

Dear Mr. White:

The City of Carmel-by-the-Sea is pleased to offer its comments as part of the public review process for the Fort Ord Reuse Plan (FORP) and the Draft Environmental Impact Report (DEIR). The City has been an active participant in the planning and development of the FORP and has a vital regional interest in making certain that the base reuse program is practical, responsible and environmentally sound. To these ends, the City has comments on both the Plan itself and the DEIR.

The City's comments touch on broad regional issues; this is appropriate given the geographic, economic and governmental relationships of Carmel-by-the-Sea to the Fort Ord planning area and the Fort Ord Reuse Authority (FORA). This broad approach in no way diminishes the importance or validity of the more detailed comments you will receive from other agencies or from individual citizens. The City agrees with many of them. However, your legal responsibility to respond to all environmental comments, regardless of who submits them, would make their repetition here redundant.

Administrative Issues - The original purposes of the Reuse Plan as established in Senate Bill 899 were to minimize disruption to the civilian economy of the Monterey Bay area while enhancing both the economy and quality of life and protecting environmental resources. These purposes appear to have been replaced with a new purpose of replacing jobs and accommodating additional growth beyond what existed when the Base was closed. When did the purpose change? Who authorized the change? Why was it changed? Wouldn't an equal or greater number of civilian jobs actually increase disruption to the Monterey Bay area since civilian jobs are likely to have larger economic multipliers and more of an impact on surrounding communities than did the self-contained military economy?

The City requests that the EIR include a new alternative that implements the intent of SB 899 by: 1) defining just what economic disruption was actually caused by closure of the base; and 2) defining growth limits for jobs, population and housing that would

Page 2.

cause no increase in impacts on surrounding communities from base reuse at build-out than existed when the base was occupied. 2

According to CEQA, the chief advantages of preparing a program EIR (as was done for this project) are to: 3

- o ensure that cumulative impacts are well considered;
- o avoid repetitive subsequent analysis of basic policy issues; and
- o allow review of broad policy issues/alternatives and programmatic mitigations when flexibility still exists for dealing with basic problems and cumulative impacts.

Many of these benefits are not realized in the DEIR because of a failure to fully develop the analysis of alternatives. This is true of the main project alternatives as well as the unsettled alternatives for dealing with important issues such as roads, water and design.

Each of these must be acknowledged as having potentially significant effects. The nature of these effects will depend on the choices made in dealing with them. At this early stage, several choices for each issue can be described that point toward different directions with significantly different impacts.

The EIR must make a good-faith effort to identify these choices and the impacts/mitigations relevant to their different directions. Without this analysis the EIR fails to provide decision-makers and the public the information necessary for an informed decision on the appropriate policies, programs and standards of the Plan. This prevents environmental consequences from influencing the Plan outcome, a primary function of the environmental review process, and renders the EIR inadequate. Alternatively, where the Plan provides certainty of direction (i.e., makes a choice), the EIR can avoid most of this analysis and concentrate on the effects/mitigations appropriate to the choice made. Delaying analysis prevents early plan changes that could avoid or lessen significant effects and defeats the very purpose of the CEQA process.

Transportation and Circulation - Of all the "resources" that will limit development in the Fort Ord planning area, road capacity is the most constraining. Existing and projected deficiencies (without FORP development) on roads throughout the County will compete for limited funds from federal, state and local sources. Development within Fort Ord will not generate sufficient funds to make necessary road improvements without additional funding from other sources. This will generate significant impacts. A recent study commissioned by the Transportation Agency for Monterey County (Fort Ord Reuse Transportation Study, JHK and Associates, 1996) indicates the magnitude of this problem. Absent some new funding source, ten critical road sections will be operating at level of service F by 4

Page 3.

the year 2015. These ten include: Highway 1 north of Castroville, Highway 1 from its intersection with Highway 68 to the Fort Ord main gate, and Highways 68, 156, and 183. 5

These are problems created primarily by existing and projected development outside the FORP area. Nonetheless, they will serve as a potent restraint on development. Assuming that a new Regionwide funding source does not materialize, this would raise several questions:

- o Will inadequate road capacity produce uneven growth restraints within sub-areas of the Plan area?
- o Will inadequate road capacity produce uneven growth restraints among the various land use categories that are carefully balanced within the Plan (housing, commercial, industrial, etc.)?
- o If uneven growth occurs due to road deficiencies how will this affect the jobs/housing balance in the Plan and will this cause its own circulation impacts?
- o Will the Plan still be fiscally balanced?

Highway 1 is of critical importance to the Monterey Peninsula and Carmel-by-the-Sea. This road already operates at LOS-E North of Castroville. The FORP and DEIR project an LOS of E or F for the section of Highway 1 between Highway 68 and the Main Gate by the year 2015. This could have significant impacts on the Peninsula economy and on air quality. Table 4.7-3 in the DEIR shows an improved level of service under the optimistic funding scenario for Highway 1 between Highway 68 and the Main Gate (but similar traffic volumes to the constrained scenario). Does this scenario include a highway widening that is not listed in Table 4.7-2? The documents acknowledge that widening Highway 1 is opposed by the California Coastal Commission and that widening is unfunded in the STIP. The City also notes a doubling in traffic volume for Highway 1 north of Highway 156 and an obvious drop in level of service to "F". This volume is shown as slightly less under the financially constrained scenario. Why? Won't Fort Ord add any traffic to this road? Since there are no levels of service below F, can the conditions be described verbally for this two-lane road when carrying over 60,000 vehicles per day? 5

Two sections of Highway 1 are shown as dropping from LOS-C to LOS-D under the proposed Plan. This is a significant impact. What Plan changes would be required to avoid the significant impact of a drop below Level of Service C for Highway 1 in these areas? The City strongly requests that a new alternative be evaluated in the DEIR that limits Fort Ord growth to the road capacity for which funding is secured and which avoids the significant impact of further drops in level of service on Highway 1 beyond those projected without Fort Ord. 6

The City notes that the FORP and DEIR identify many intersections and east/west routes that may need upgrading. These documents suggest several options for improving east/west traffic but none 7

Page 4.

are selected, nor are the relative merits of these options explored at even a cursory level. This leaves decision-makers with little useful information for directing the course of Plan implementation toward environmentally sound alternatives. This is contrary to the intent of CEQA and to recent court decisions.

Water Supply - The second most limiting resource appears to be water. The existing water infrastructure is questionable. Half of the on-site storage reservoirs and pump stations require repair; 25% of all transmission lines need replacement and many wells need redrilling. The City notes that all water is from wells and all but one of these are drawing from the Salinas Basin. Unresolved questions about salt water intrusion may lead to Basinwide adjudication by the State and a reduction in the assumed stable yield of 6,600 acre-feet/year for development through 2015 at Fort Ord. 8

The DEIR asserts that beyond 2015 the Plan would need one or more new water supply projects (desalination, recharge ponds, imported supplies, reclamation) but these are not studied in the DEIR. This makes the DEIR inadequate and this document's conclusions that "reasonable alternatives are identified" is unsupported by analysis. Given the uncertainty of 1) the existing supply, (2) the importance of water in realizing the mutually-supporting facets of projected growth under the Plan, and 3) the lack of even a policy level evaluation of the practicality and environmental effects of the various water supply alternatives, the DEIR's conclusion that water supply is a "less than significant impact" cannot be supported.

What will happen if State adjudication lowers Ford Ord water use to the 1989 historic level of 5,100 acre-feet/year? What are the environmental effects associated with salt water intrusion into an aquifer? Once contaminated with salt, can an aquifer be restored? What are the general positive and negative impacts of each of the water supply alternatives mentioned in the DEIR? Are there sites that appear more favorable or less feasible for a desalination plant within the Plan area? Isn't the proposed desalination plant located in a high liquifaction zone? How vulnerable is each of the water supply projects to supply interruption from earthquakes, droughts or other natural occurrences? If supply were interrupted, would development at Fort Ord compete with current users of water supplies under the jurisdiction of the Monterey Peninsula Water Management District? 9 10

Design - The City applauds many of the design elements and principles evident in the Plan. The concept of distinct villages, the use of simple grid systems for streets, the fostering of mixed-use development and the creation of a vibrant university town with a seamless interface between the campus and village life are all welcome design elements. The City hopes these beginnings will be further strengthened as design guidelines are developed. This will be especially important for mixed-use villages where: 11

Page 5.

- o blocks should be smaller and streets narrow;
- o buildings should conform to a "build-to" line near the sidewalk to create a pedestrian environment;
- o parking should be behind buildings, underground or otherwise hidden from street view rather than be placed between sidewalks and storefronts (as is typical of "strip commercial");
- o the size and scale of buildings, storefronts and signage should be "pedestrian friendly".

The principal design concerns of the City are related to the Highway 1 view corridor, efficient/cost-effective infrastructure, and the disturbing lack of any regional design guidelines in the Plan. Many visitors approach the Monterey Peninsula from the north via Highway 1. Development in Marina, Fort Ord and Seaside will serve as an important visual gateway. The visual character established at Fort Ord will either blend with and enhance the character already achieved by the cities of Monterey and Pacific Grove, or will create a new disruptive character that visitors will endure and drive past. The absence of design guidelines makes visual aesthetics a potentially significant impact. How visible and how tall with the following be from Highway 1:

- o The Marina Town Center/mixed-use district;
- o Big Box/regional retail at Polygon-15;
- o CSUMB; and
- o Hotel west of Highway 1 near 8th Street?

The City of Carmel-by-the-Sea anticipates that responding to this question without design guidelines will be nearly impossible. For example, the Plan (at page 3-110) encourages the City of Marina to "take advantage of the State Highway 1 visibility and accessibility to establish a high quality office/RD Center to anchor the town center". But on the same page are objectives to protect visual qualities of the Highway 1 scenic corridor that require special setbacks, building height and future design guidelines. These two provisions appear to be in conflict and are unresolved by the Plan or the EIR.

Significant analysis will be required to make realistic decisions about these guidelines. For example, objective 4a on this same page calls for a 100-foot setback; however no analysis in the DEIR shows whether this is too much or not enough to achieve the desired result. Similarly, objective 4c on this page calls for a "maximum building height related to an identified mature landscaping height to accommodate higher intensity land uses appropriate to this town center location without detracting from the regional landscape character..." In this objective, what does the term "related to" mean? (Equal to? Twice as high as? Half as high?). The DEIR fails to provide any direction or analysis of the viewshed impacts. The angle of view from Highway 1 will interact with the topography in the development areas to suggest appropriate heights that are consistent with regional character. The Plan should strive for

filtered views of attractive development that are less than the height of the trees used. This is consistent with the character of other Monterey Bay communities.

The spread-out nature of the Plan may lead to infrastructure inefficiencies. The Floor Area Ratios used do not specify whether they are gross or net of roads. Even if they are gross FARs they appear to be low in the commercial, industrial and manufacturing categories. Raising the FARs to a net (parcel-based) level of 0.5 to 1.0 would allow for a more compact, vibrant, vertical, mixed-use development pattern that is less auto-dependent, easier to serve by infrastructure and more consistent with patterns found in other Peninsula communities. In Polygons 2a, 2b, 2c, 2d, F, 8b, 8c, 20e, 20h, 20a and 20b higher FARs might be appropriate along with the creation of larger open space buffers to separate villages and other development areas. Was there a deliberate effort in the Plan to create a continuous band of development from Seaside north to Marina - meeting at CSUMB - without any significant open space breaks?

Economics and Construction - The FORP and DEIR estimate the number of jobs and population increases generated by the Plan. However, several parts of this analysis remain unclear. Do the estimates include economic multipliers for secondary jobs created in the region to service the needs of the new job-holders and their families? To what extent will growth of housing and employment at Fort Ord reduce the growth of housing and employment for other cities on the Peninsula? The Plan anticipates:

- o 40,200 square feet/year of new retail development;
- o 135,000 square feet/year of office/research development;
- o 55,000 square feet/year of light industry development;
- and
- o 313 new housing units per year.

Will the existing construction labor market be able to absorb this much activity? If not, has the growth in construction jobs been accounted for in the analysis? Where will new construction workers live? Will they commute and impact road systems? What are the construction-related impacts associated with the Plan?

Alternatives and Mitigation Measures - Changes to the Plan/and or a good mitigation monitoring program administered by FORA could be powerful tools to minimize impacts on the region. Protecting the region from growth that runs ahead of infrastructure will be critical to the Plan's success.

The FORP lacks any programs to ensure that projects are not approved without a fully developed water supply. Either the Plan or the EIR mitigations should establish milestones or triggers for:

- o infrastructure repair;
- o basin impacts/capacity determinations;

Page 7.

- o approved alternative source;
- o alternative source under construction;
- o land sold to developers in amounts consistent with capacity; and
- o issuance of project permits.

Until the infrastructure improvement plans are prepared, how can impact fees be collected? How would you know the exact cost to charge developers? Can impact fees for "unknown" projects be legally collected? The City strongly urges that no development permits be authorized until an infrastructure plan and all related financing agreements are developed and approved. This should include a phasing plan with triggers to start and stop development so that growth does not occur without the infrastructure upon which it will rely. 20

At present, mitigation depends on one of the Plan's greatest weaknesses - objectives that have little or no teeth. Throughout the FORP, objectives that address critical issues use verbs such as "encourage," "promote" and "enhance". Upon Plan adoption the land use jurisdictions within the Plan area will prepare zoning and other implementation tools which must be certified by FORA if they are "consistent" with these fuzzy objectives. Since many policy issues are unresolved by the Plan, and the EIR provides scant information or analysis of reasonable alternatives for resolving them, decision-makers will be left adrift in making these important certification decisions. The implementing jurisdictions will have carte blanche in proposing "consistent" implementation plans. A stronger EIR would help FORA amend the Plan by: 21

- o identifying project alternatives that mitigate impacts;
- o evaluating alternate choices for unresolved issues (water, design, etc.) so that basic policy can be set at the Plan's adoption;
- o making definitive plan objectives with teeth (using words such as "require," "prohibit" and "shall"); and
- o identifying the need for implementation tools to be in place before the first development permit is issued (infrastructure and phasing plan, impact fee structure and revenue sharing plan, design guidelines and viewshed guidelines, mitigation triggering mechanisms).

* * *

In summary, the City of Carmel-by-the-Sea believes that the DEIR is inadequate in its identification of alternatives that avoid significant project impacts and deficient in its analysis of the cumulative impacts and the policy-level choices that should be made part of the Plan prior to its adoption. For these reasons, the City respectfully requests that the DEIR be rewritten and recirculated and

Mr. Les White
2 October 1996

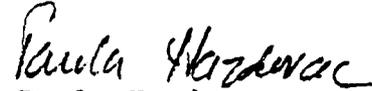
Page 8.

that realistic, adoptable resource-constrained alternatives be included in the revised draft. The City also requests that if a Final EIR is prepared instead, that the full text of this and other comment letters be reproduced in the document.

Very truly yours,



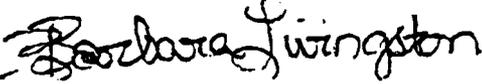
Bob Fischer
Mayor Pro Tempore



Paula Hazdovac
Council Member



Marshall Hydon
Council Member



Barbara Livingston
Council Member



Ken White
Mayor

KW:R:sam

Zane E. Jacobs
2075 Mariposa St.
Seaside CA 93955-3316
2 Oct. 1996

Fort Ord Reuse Authority
100 12th St. Bldg. 2880
Marina CA 93933

Howdy,

Since the Government closed Fort Ord I have watched FORA proposals as published in local papers. Being a long time resident (since 1954) of Seaside, the Monterey area has changed significantly during my stay here.

The last day of August a Telephone surveyor from Cal Am Water Company asked me a few questions concerning what I wanted concerning water and choices were given by the surveyor. Each time a question was asked I emphasized to the fellow it is NOT what I want but what reality dictates concerning water use in this area.

For about the last year or so I have seen a grand design proposed by FORA in which gradual development will increase the old Federal land known as Fort Ord into a huge community of over 70,000 new residents. That figure is about twice the number of people who were living on Fort Ord prior to its closure.

Have the FORA planners included in their DREAM a detailed Environmental Impact Report about what such an increase of people would do to our already inadequate WATER supply? Are the FORA planers aware that almost 80% of existing water use in the Monterey area is illegal and when that illegal water usage is finally stopped, water rationing the likes of which has never been experienced in this area will allow less than 50 gallons per day per person. Considerably less!

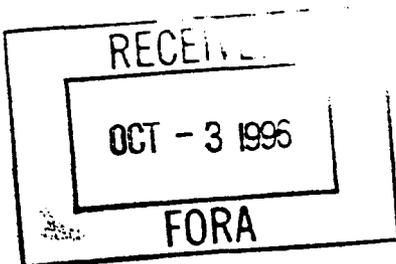
When the acute WATER problem is factored into the FORA DREAM community, I doubt any other consideration will be necessary to discourage such a pipe dream as currently envisaged by people who must live in utopia far removed from the Monterey Bay area.

The existing college has been looked at closely by those who budget for this type thing in the Calif. educational system and recent printed news indicates the CSU Monterey Bay budget was cut in half. Perhaps someone is starting to wake up in the business and educational communities that huge development of the old Fort Ord land mass is impractical from one standpoint alone. WATER.

Agriculture seems to be the largest user of water in our area (about 80%) and control of over pumping of water for agriculture seems to be non existent to highly confused BUT FORA dreamers ignore that problem and are blinded to how lack of WATER for people use must surely affect future development.

This is my input for making Ft. Ord an open Space and zero development.

Sincerely,
Zane E. Jacobs
Zane E. Jacobs



RECEIVED
OCT - 3 1996
FORA



Landing of Rochambeau, 1780

Fort Ord Reuse Authority
100 12th St. Bldg 2880
Marina, CA
93922

© USPS 1990

10-1-96
P.O. Box 703
Carmel Valley, CA
93924-0703

The FORA DEIR is a fatally flawed document. Please completely reverse the current document and not merely send it back.

Formulate a realistic plan that uses on-site safe-yield water and gives us full disclosure of environmental impacts.

Sincerely,

Jeanette J. Ayres

245-1

5 MG
10-18
DH

1450 Mohawk Ave
Salinas, Cal 93906
October 3, 1996

Honorable Sam Farr
1216 Longworth Bldg.
Washington, D.C. 20515

OCT 18 1996

Dear Representative Farr

I would like you to take the following actions:

- 1) Recognize that the Fort Ord Reuse Authority's Draft EIR is a totally flawed document
- 2) Demand a completely revised DEIR (not one that merely scales back the current document)
- 3) Formulate a realistic plan that uses on-site safe-yield water & gives us full disclosure of environmental impacts

The California Environmental Quality Act requires that an EIR be a "good faith effort at full disclosure of the impacts of a stable, finite project description. But the FORA DEIR fails to provide us with sufficient, up-to-date data before the project is begun. It fails to tell us seismic limit, seawater intrusion and unexploded ordnance to name just a few. Please remember that FORT ORD belongs to all U.S. Tax

payers not any single jurisdiction or
entity.

2

Thank You
Ted Hill

(S) RD
10/18
AH

Lori J. Rolander
215 Ridge Road
Pacific Grove, California 93950

deir.wpd

10/3/96

Dear Representative Jarr,

I am writing to request your attention to the FORA Project DEIR. As it stands, this project is proposing a ground rate five times our historic rate.

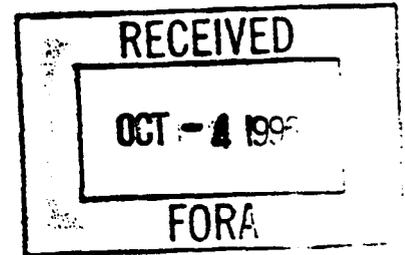
Please help FORA formulate a realistic plan using on-site, safe-yield water with consideration to environmental impact.

Thank you for your concern.

Sincerely,
Lori Rolander

October 1, 1996

To Whom It May Concern at the FORA Board:



I am writing to urge you to request on behalf of the up and coming generation of the Monterey Peninsula a completely revised DEIR for the Ft.Ord FORA project. While I see a very real need for affordable housing in this area, the type of growth this project proposes is not only disproportionate to the rest of the region, but also very environmentally unsound.

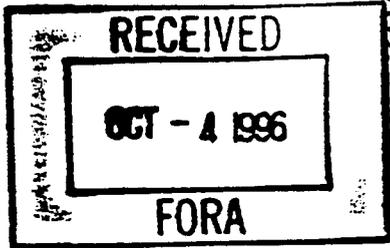
The land in question was used for many years by many people with the existing water supply, why can we not do the same? Furthermore, it appears as though the existing industries (agriculture and tourism) are doing very well. The massive development that is currently sought after would only lessen the area's appeal for tourists and the industry would pollute the region setting a bad example to the ag community that is already trying to make vast environmental improvements.

Please reconsider the current unsatisfactory DEIR, and stress the need for a new one on behalf of those of us who will help this peninsula maintain its character and economic viability.

Sincerely,

A handwritten signature in cursive script that reads "Christina Cartier".

Christina Cartier
25527 Riverside Way
Carmel CA 93923



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL OCEAN SERVICE

Monterey Bay National Marine Sanctuary
299 Foam Street, Suite D
Monterey, California 93940

October 1, 1996

Director
Fort Ord Reuse Authority
100 12th Street, Building 2880
Marina, California 93933

**SUBJECT: Comments on the Fort Ord Reuse Authority Draft
Environmental Impact Report for the Fort Ord
Reuse Plan**

Dear Director:

The Monterey Bay National Marine Sanctuary has reviewed the Fort Ord Reuse Authority's (FORA) Draft Environmental Impact Report DEIR for the Fort Ord Reuse Plan (May 1996). The purpose of the DEIR is the evaluation of transfer of the former Fort Ord property to the local community. The Fort Ord Reuse Authority Act requires FORA to:

- a) *Facilitate the transfer and reuse of Fort Ord with all practical speed;*
- b) *Minimize the disruption caused by the base's closure on the civilian economy and the people of the Monterey Bay area;*
- c) *Provide for reuse and development of the base area in ways that enhance the economy and quality of life of the Monterey Bay community; and*
- d) **Maintain and protect the unique environmental resources of the area** (emphasis added) (DEIR pages 1-1, 2-1, 3-2).

The Sanctuary is concerned about some development plans at Fort Ord that may affect the resources or qualities of the Sanctuary in Monterey Bay. We are concerned that the DEIR does not present an adequate evaluation of coastal development project alternatives and environmental impacts for: (1) polluted runoff and storm drain pipes that discharge to Monterey Bay, (2) water supply and the potential development of a desalination plant, (3) conflicts with the management goals of the Monterey Bay National Marine Sanctuary, and (4) means to handle sewage if a pump station west of Highway 1 is disabled. We are also concerned about the general lack of detailed environmental impact assessments for coastal project alternatives, and the lack of consideration for



mitigation measures considered for coastal environmental impacts in Section 4.5 of the DEIR. 1

The coastal areas of Fort Ord west of Highway 1 and the adjacent nearshore area of Monterey Bay are proposed for development to a certain degree under this DEIR. The coastal development plans in DEIR should be identical to the California Department of Parks and Recreation's (CDPR) Preliminary General Plan (PGP) for the Fort Ord Dunes State Park (May 1996); however, the DEIR plans are not identical to the PGP. The Sanctuary sent comments on CDPR's PGP on August 19, 1996 (see enclosure). Please consider all of the enclosed comments on CDPR's PGP as comments on applicable sections of FORA's DEIR. 2

As documented in the CDPR PGP, the stormwater pipes now discharging polluted runoff across the beach and into Monterey Bay are proposed for removal. Under the PGP, stormwater collected on Fort Ord is proposed for beneficial use in the creation of wetland environments. The FORA DEIR should contain an identical detailed proposal to remove the pipes and use the stormwater constructively. We made this request in our comments to FORA on the Notice of Preparation for the DEIR; however, FORA has failed to address our request adequately. 3

Discharges in the Sanctuary are prohibited under the Sanctuary's regulations at 15 C.F.R. Section 922.132(a)(2)(i). Discharges outside the Sanctuary's boundary that enter and injure Sanctuary resources or qualities are also prohibited under 15 C.F.R. Section 922.132(a)(2)(ii). The DEIR should not be considered adequate for the assessment, planning and development of the desalination plant mentioned briefly in a few sections of the document. A detailed National Environmental Policy Act environmental impact statement and/or a California Environmental Quality Act environmental impact report should be prepared for this type of facility in the coastal zone. A complete analysis of the need for such a facility, compared to other reasonable options and a cumulative impact analysis on impacts to the Monterey Bay National Marine Sanctuary, should be prepared based on other desalination plants proposed or constructed in the central California region. 4

The DEIR does not provide any discussion about the proposed increase in the City of Seaside's sphere of influence that extends 10,000 feet seaward into Monterey Bay. Without a complete discussion of this proposal and a description of the ultimate plans that Seaside has for this area, the Sanctuary cannot evaluate the potential environmental impacts of Seaside's request to extend its jurisdiction into Monterey Bay. If Seaside's ultimate plan is the construction of a pier, wharf or any other structure in Monterey Bay, we wish to remind FORA and the City of Seaside that *drilling into, dredging or otherwise altering the seabed of the Sanctuary; or constructing, placing or abandoning any structure, material or other matter on the seabed of the Sanctuary* is prohibited under 15 C.F.R. Section 922.132(a)(4). 5

At this time, the Sanctuary finds that the DEIR has not responded adequately to our concerns expressed in comments on this Notice of Preparation, nor has the DEIR adequately characterized potential impacts and development alternatives to protect Sanctuary resources and qualities. The Sanctuary requests that FORA work with our staff to address the concerns listed in this cover letter and the enclosed detailed comments before a final environmental impact report is prepared. My staff is available to meet with FORA's staff and its contractors to discuss our concerns. If you have any questions on our concerns, please contact me at (408) 647-4201.

Sincerely,


Terry Jackson
Sanctuary Manager

Enclosures (4)

cc: Stephanie Thornton, NOAA SRD
Debra Malek, NOAA SRD
Charlie Wahle, NOAA SRD
Laurie Sullivan, NOAA Coastal Resources Coordinator (H-8-5)
Lida Tan, U.S. EPA Region IX (H-9-1)
James Willison, Ft. Ord Environmental Coordinator
Tami Grove, CCC
Roger Briggs, RWQCB
Dr. Michael Martin, CDFG
Kenneth Gray, CDPR
William Kilgore, CDTSC
Rachel Saunders, CMC
Bernice Boyd, Co-Chair, Ft. Ord RAB

7

**Monterey Bay National Marine Sanctuary
Comments on the Draft Environmental Impact Report
Fort Ord Reuse Authority (FORA) Reuse Plan**

- A. The Sanctuary notes that the "No Project Alternative" is the environmentally superior alternative (DEIR page 2-6). In view of the Army's desire to turn over land areas of Fort Ord and the local community's desire to develop these lands, the Sanctuary understands that this alternative does not meet the FORA's objectives (DEIR page 2-6). However, we also note that the Proposed Project includes: (1) the largest population figure (51,773), (2) the largest number of general housing units (17,132), (3) **the highest projected need for local water supply (18,262 acre feet per year)**, (4) **the highest increase in wastewater generation (9.8 million gallons per day)** (emphasis added), and (5) the largest habitat management area (62%), (DEIR Table 2.4-2, pages 2-8 to 2-11).
1. The Sanctuary commends FORA for proposing to preserve 62% of the land area for habitat management.
 2. The Sanctuary requests that FORA consider a project alternative that does not have such a large water supply budget, thus, precluding the need for construction of a desalination plant with discharges to Monterey Bay. Such a project alternative (with a lower water supply budget) will also generate a lower volume of wastewater, which may ultimately be discharged into Monterey Bay. Elimination of desalination brine discharges and reductions of wastewater discharges into Monterey Bay will help protect Sanctuary resources and qualities and reduce conflicts with the goals of the Sanctuary's Management Plan (DEIR Table 2.4-2, page 2-15).
 3. The Sanctuary is concerned about some of the other components of the Proposed Project, including polluted runoff and sedimentation from erosion (DEIR Table 2.4-2, page 2-11), that may cause significant environmental impacts to resources and qualities of the Sanctuary. 8
 4. As the Sanctuary requested in our comments on the Notice of Preparation for this DEIR, FORA should develop a plan and commit to removing the five (not four as mentioned on DEIR page 4-38) large stormwater pipes that discharge into Monterey Bay. These pipes could be a hazard on the beach and may fall down if beach erosion rates, from 1.5 to 7 feet per year (DEIR page 4-27), continue along the ocean front area. The DEIR should discuss what disposal procedures will be used for the sediment and debris that will be cleared from culverts and drain site areas (DEIR page 4-38), especially contaminated material. 9

FORA should work with the U.S. Army Corps of Engineers, the California Department of Parks and Recreation, the California Department of Fish and Game, the California Coastal Commission, and the Watershed Institute at California State University Monterey Bay to design wetland areas that could be constructed and maintained using stormwater. A joint project such as this would be a major environmental benefit to the Fort Ord Dunes State Park, California's coastal resources, CSUMB and the Sanctuary. This DEIR does not contain any discussion about such a beneficial use of stormwater and the restoration of valuable coastal wetland habitat. The Sanctuary finds this omission a serious deficiency in the DEIR.

B. DEIR Table 3.2-1 (page 3-6) defines land uses under the Proposed Project displayed in DEIR Figure 3.2-1. These land uses are:

12a Open Space/Recreation

12b Open Space/Recreation with a Proposed Beach Through Road

13 Open Space/Recreation

14a Visitor Serving with Hotel Opportunity Site

14b Public Facility/Institutional

14c Public Facility/Institutional (Desalination)

The Sanctuary is concerned that these land uses are not the same as those discussed in the CDPR PGP and displayed in PGP Map 6 (sheets 1 through 4). The PGP does not include any designation of a hotel opportunity site, a specific area for a 23-acre desalination plant, or an aquaculture facility (DEIR pages 4-7, 4-10). The proposed uses of the dune area west of Highway 1 should be identical to the uses proposed in the CDPR PGP. FORA should revise the DEIR accordingly. If necessary, a detailed plan of the dune area should be presented in the revised DEIR.

C. One of the possibilities discussed in the DEIR is the need for a desalination facility to provide additional water for development (DEIR pages 4-7, 4-10). The Sanctuary is concerned that the DEIR does not contain any evaluation of the need for a desalination plant nor does it contain an evaluation of alternatives for a desalination plant. The DEIR should discuss whether fixing leaks in the current water delivery system would significantly reduce the amount of drinking water needed to serve development at Fort Ord.

If a desalination plant is constructed, a National Pollutant Discharge Elimination System permit or a Waste Discharge

Requirement will be proposed by the Regional Water Quality Control Board and reviewed by the Sanctuary. This process is not discussed in the DEIR. The DEIR does not contain a cumulative impact analysis based on the construction or proposed construction of similar facilities in southern Monterey Bay.

The Sanctuary requests that the plan for a desalination plant be fully evaluated in a National Environmental Policy Act environmental impact statement or a California Environmental Quality Act environmental impact report. FORA's DEIR should not be considered adequate to evaluate the need, construction or cumulative impacts of a desalination plant located on Fort Ord. The DEIR should discuss how much of the 7,932 acre feet per year (DEIR page 4-42) water resource deficit would be covered by the construction of a desalination plant.

- D. The DEIR briefly discusses Seaside's proposed extension of its sphere of influence 10,000 feet out into Monterey Bay (DEIR section 3.6.2, page 3-10). This extension is also shown on Figure 3.6-1. The Sanctuary requests that FORA expand this section, providing information on the legal basis for such an extension, the proposed uses of the zone extending 10,000 feet into Monterey Bay, any potential conflicts with Sanctuary regulations (15. C.F.R. Part 922), and any potential environmental impacts from proposed activities in this extension zone. Seaside's request should not be granted under this DEIR. A complete discussion of Seaside's proposed plans for this area should be reviewed before any decision is made on the request to extend Seaside's sphere of influence. 13
- E. Section 3.7 on Approvals and Permits Required by Local Governments and Regulatory Agencies to Implement the Proposed Project (DEIR pages 3-11 and 3-12) does not adequately address the regulatory role of the Monterey Bay National Marine Sanctuary. Copies of the Sanctuary's regulations (15 C.F.R. Part 922) and the National Marine Sanctuaries Act are enclosed with these comments. In addition, a copy of the Sanctuary's water quality protection program Memorandum of Agreement is also enclosed. A complete description of the Sanctuary's role should be included in the revised DEIR. My staff is available to work with the authors of the DEIR to review any revisions before publication. Most of the other agency descriptions are also inadequate. Please ask the DEIR contractor to prepare a more comprehensive evaluation for this entire section. 14
- F. The boundary of the Sanctuary is defined as the mean high water line [15 C.F.R. Section 922.130(b)]. The Sanctuary's boundary should be included on all jurisdictional boundary maps in the DEIR. The DEIR should acknowledge that the former Fort Ord restricted and danger zones once existed in Monterey Bay, but the areas are now unrestricted and under 15

the management authority of the State of California (DEIR page 4-3).

- G. The DEIR should discuss what plans FORA has for the wastewater treatment plants at the Main Garrison plant and the Ord Village plant, including sewage ponds, sludge tanks and pipelines (DEIR page 4-36). The Sanctuary strongly requests that any sewage spills be prevented from discharging to the ocean through any stormwater pipelines. All sewage spills should be routed to former sewage ponds near the Main Garrison treatment plant.

14



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL OCEAN SERVICE

Monterey Bay National Marine Sanctuary
299 Foam Street, Suite D
Monterey, California 93940

August 19, 1996

Donald W. Murphy
Director
California State Parks and Recreation
P.O. Box 942896
Sacramento, California 94296-0001

SUBJECT: Review of Fort Ord Dunes State Park Preliminary
General Plan

Dear Mr. Murphy:

The Monterey Bay National Marine Sanctuary has reviewed the following report: Fort Ord Dunes State Park Preliminary General Plan (PGP) (May 1986). I apologize for submitting these comments after the July 29, 1996 comment deadline, but staff time commitments did not permit a thorough review of the report until now.

The Sanctuary found the PGP very encouraging, especially the State Parks proposal to remove the stormwater outfall pipes from the beach area seaward of the dunes. For the past two years, the Sanctuary has requested that the U.S. Army remove these structures in comment letters and at meetings on the Fort Ord Superfund clean-up project. Removal of these structures and proper treatment and beneficial use of stormwater could be used to create valuable wetland environments in appropriately located areas.

The Sanctuary has enclosed some specific comments on the PGP. If you have questions on our comments, please contact me at (408) 647-4201.

Sincerely,

Terry Jackson
Sanctuary Manager

Enclosure

See Distribution List



248-8

Distribution List

cc: Stephanie Thornton, NOAA SRD
Debra Malek, NOAA SRD
Charlie Wahle, NOAA SRD
Laurie Sullivan, NOAA CRC, c/o U.S. EPA Region IX (H-8-5)
James Willison, U.S. Army DLIFLC
Ken Gray, CPR
Tami Grove, CCC
Roger Briggs, RWQCB
Michael Martin, CDFG
William Kilgore, DTSC
Bernice Boyd, Fort Ord RAB Community Co-Chair

Monterey Bay National Marine Sanctuary
Comments on the Fort Ord Dunes State Park
Preliminary General Plan

17

A. Ocean Outfalls

The Sanctuary appreciates State Parks' support for the protection of Sanctuary resources and qualities. We also appreciate State Parks' Priority One ranking for the removal of these structures (page 95). This proposal is the similar to the views expressed by the Sanctuary over the past two years at many meetings and in many comment letters to the U.S. Army for the removal of the stormwater outfall structures and the productive use of stormwater on the former Fort Ord property.

The Sanctuary agrees with the following conclusions stated in the Preliminary General Plan (PGP):

1. The outfall structures on the beach, supported by massive concrete structures, are in poor condition, appear to be deteriorating, and are subject to damage from coastal erosion and ocean wave action. The deterioration of the southernmost beach outfall structure poses a serious public safety hazard (page 25).
2. The ocean outfalls are in poor condition. They pose a hazard for recreation use of the beaches and significantly detract from the natural appearance of the beach. The stormwater contains contaminants that may be degrading the coastal dune and marine environments (emphasis added) (page 57).
3. All of the outfalls are suspected of transporting pollutants into the park and [Monterey Bay] from the east side of [Highway 1]. Removal of the beach outfall structures is a high priority to create a safe and attractive beach environment (page 87).
4. The Department will cooperate with the local agencies responsible for stormwater collection and dispersal to remove the three elevated and one buried storm drains which empty across and onto the beach [in the southern area of the Park]. Areas for creation of seasonal wetlands to handle the stormwater and increase habitat values are included in the plan. Removal of the beach storm drain structures is a high priority for creating a safe and attractive recreation beach environment (page 93).

The General Plan should evaluate whether the existing ocean outfall north of Stilwell Hall could be removed and any overflow of sewage could be routed to the former sewage percolation ponds that were used at the Main Garrison Wastewater Treatment Plant (page 89). The Sanctuary does not agree that emergency discharge of sewage from a failure of the regional sewage system should be allowed to flow into Monterey Bay. Such a discharge could have significant negative effects on Sanctuary resources and qualities. Such discharges from beyond the Sanctuary boundary that enter and injure Sanctuary resources are prohibited under the Sanctuary's regulations at 15 C.F.R. Section 922.132(a)(2)(ii). Direct discharges to the Sanctuary are prohibited under 15 C.F.R. Section 922.132(a)(2)(i).

Map 2 in the Executive Summary should show the location of all storm drains that discharge storm water to the ocean and in the dune areas. It appears that two ocean outfalls are not shown on the maps.

B. Productive Use of Stormwater

The Sanctuary strongly supports the proposed evaluation of the creation of vernal ponds (Priority Two, page 96) at appropriate locations in the dune areas or other areas east of Highway 1. This proposal would be a beneficial use of stormwater. The construction of vernal pools would facilitate the removal of the deteriorated stormwater pipes and protect Sanctuary resources and qualities. The Sanctuary shares the State Parks' concerns about the outfall structures and the quality of the stormwater discharged through the stormwater system. We are prepared to work closely with State Parks to develop a plan for stormwater disposal that will allow for the removal of the ocean outfall structures and the end of direct discharge of stormwater to the marine environment (page 58).

C. Existing Buildings and Development

The Sanctuary notes that the development of an aquaculture facility at the Main Garrison Sewage Treatment Plant is infeasible (page 19). The PGP indicates that some structures at the Main Garrison Sewage Treatment facilities will be demolished and others may be designated uses (pages 62, 86). The General Plan should identify which of these structures will be demolished and which will be maintained, including the treatment plant structures, the sludge drying beds, and the sewage settling ponds. In addition, similar information should be presented in the General Plan about the proposed removal or maintenance of structures at the Ord Village Wastewater Treatment Plant (page 87).

On page 20 of the PGP, construction of a desalination plant is mentioned. The General Plan should provide a detailed discussion about the projected need for a desalination plant compared to all other reasonable water resource and conservation measures. A complete analysis of the need for a desalination

plant should be evaluated in a National Environmental Policy Act environmental impact statement and/or a California Environmental Quality Act environmental impact report to determine whether any potential environmental impacts occur in the Sanctuary due to cumulative effects from other desalination plants either constructed or proposed for construction in southern Monterey Bay. This discussion presented in this EIR is not adequate to evaluate the potential impact from desalination plant discharges.

D. State Park and Sanctuary Boundary

The General Plan should include a clear description of the boundary of the State Park, including the coordinates and depth of the seaward boundary line, the distance from the shoreline (mean lower low water) of the seaward boundary and an explanation of the jurisdiction for extending the boundary of the State Park into the ocean (page 129). In addition, the General Plan should acknowledge that the seaward area is within the Sanctuary. All maps showing marine areas of the State Park (Map 4, Map 5 and Map 6) should include the landward boundary of the Monterey Bay National Marine Sanctuary which is defined as the mean high-water line in the Sanctuary's regulations [15 C.F.R. Section 922.130(b)].

E. Education and Research

Since the entire western part of the State Park shares a boundary with the Monterey Bay National Marine Sanctuary, the General Plan should expand information about the Sanctuary in all appropriate Interpretive Elements (pages 107 to 120). The Sanctuary's Education Coordinator may be available to work with State Parks on development of interpretive information. The Sanctuary's Research Coordinator may also be available to work with State Park resource managers to develop research plans as part of the Sanctuary's overall research goals.

F. Enforcement

The Sanctuary acknowledges the State Parks' commitment to cooperate with NOAA in handling marine incidents along the Fort Ord coast (page 129). We appreciate the State Parks' willingness to work with the Sanctuary on enforcement issues.

G. Marine Geology

The Sanctuary requests that the General Plan include a section on Marine Geology (page 26) if the boundary of the proposed State Park extends seaward into Monterey Bay.

City of Marina

211 HILLCREST AVENUE
MARINA, CA 93933
TELEPHONE (408) 384-3715
FAX (408) 384-0425



October 4, 1996

Ms. Ann Hebenstreit
Fort Ord Reuse Authority
100 12th Street, Building 2880
Marina, CA 93933

Dear Ms. Hebenstreit:

SUBJECT: COMMENTS ON DRAFT FORT ORD REUSE PLAN AND DRAFT ENVIRONMENTAL IMPACT REPORT

On August 22, 1996, Mayor Jim Vocelka sent to Chairman Barlich the City Of Marina's general comments on the Draft Fort Ord Reuse Plan (Plan) and the Draft Environmental Impact Report (DEIR) prepared for the Plan. In that letter, the Mayor stated that "City Staff may follow this letter with a supplemental letter on more detailed aspects of the Plan and DEIR within the comment period". I am now transmitting just such a supplemental letter of more detailed comments on some aspects of the Plan and/or DEIR. A few of the comments in this letter are new but most of them are repeated from previous detailed comments made to FORA by City Staff because the Plan and DEIR's responses to these previous comments remain inadequate.

Repeated Comments on Plan

1. In my 4/2/96 memo to Ann Hebenstreit on the Admin. Draft Plan, my comment no. 7. stated as follows:

Pages 4-46 through 4-49, p. 4-61 Program D.1-2, and elsewhere where applicable -- Please clarify at all the appropriate places in the text the uses of the terms "Community Design Framework", "Community Design standards of the Fort Ord Reuse Plan", "City's design guidelines for [the former] Fort Ord lands", "Community Design Element", and "special design standards for the State Highway 1 Special Design District". The combinations, meaning and distinctions between the terms are very confusing to the reader. Also please clarify in the text of the Plan that the proposed requirement for the "City's design guidelines for [the former] Fort Ord lands" (p. 4-48, Program B-3.1) and "special design standards for

the State Highway 1 Special Design District" (p. 4-61, Program D.1-2) are meant to only require the City to prepare textual (and not graphic) guidelines/design standards as was represented at the 4/1/96 Administrative Committee Sub Group meeting.

The Draft Plan now no longer uses the term "Community Design Framework" and instead uses the term "Community Design Vision". Unfortunately however, the juxtaposition of the terms are still confusing to the reader. Also, the Plan has not responded at all to the last sentence of the 4/2/96 comment and we still feel that it is important that the Plan clarify that "special design standards for the State Highway 1 Special Design District" (now p. 4-66, Program D.1-2) are meant to only require the City to prepare textual (and not graphic) guidelines/design standards as was represented at the 4/1/96 Administrative Committee Sub Group meeting.

2. This second comment is related to the first one immediately above. In my 4/2/96 memo to Ann Hebenstreit on the Admin. Draft Plan, my comment no. 8. stated as follows:

Page 4-61, programs D.1.1 and D 1.3 -- The term "State Highway 1 corridor along [the former] Fort Ord" in Program D.1.1 is too vague a term. This program seems to be a more vague version of Program D.1.3. Therefore, please delete Program D.1.1. Also, since Seaside is allowed under their Program D-1.3 on page 4-65 to only designate "a strip 500 feet wide (from Caltrans Row) along State Highway 1... as Special Design Districts", it is only fair to make Marina's related policy consistent by also only requiring our Special Design District to extend the same 500 feet, or some lesser number which would still be consistent with a Seaside policy.

Unfortunately, the Draft Plan has also not responded at all to this comment and we still feel that it is important. The policy for should be made consistent with the similar policy for Seaside. To do otherwise appears arbitrary and unfair.

3. Page 3-115 & 3-116 - On 4/10/96 at the suggestion of Heidi Feldman of EMC Planning, Inc. I faxed to Alan Gatzke of EDAW the attached edits to page 3-93 of the Administrative Draft Plan. None of the edits have been incorporated into the appropriate places at the current pages 3-115 & 3-116 of the Plan. Please respond accordingly at this time.

New Comments on Plan

4. Page 4-185, Program B-1.1 - Please add at the beginning of this policy and sentence the following words "Where the City has reason to suspect that they may occur on a proposed development site..."

5. Page 4-185, Program B-3.1 - This program is inaccurate in its assumption that a coastal pond exists in Polygon 2a. There is a depression in this polygon which receives storm water from the surrounding housing area, but this depression is not a pond in any way, shape or form. This program must be deleted. 5

6. Page 4-185, Policy B-3 - Since there is no Policy B-2, please renumber Policy B-3. 6

Repeated Comments on DEIR 7

7. In my 4/2/96 memo to Ann Hebenstreit on the Admin. Draft EIR for the Plan, my comment no. 1. stated as follows:

The DEIR's response to the comment #1 in Marina's 2/7/96 NOP response is very limited in its scope. The only index we find is on page 1-7 & 1-8. This is very limited and does not address the suggestion for a geographic based index. We remain concerned that without some form of geographic based index the DEIR will not be adequate as a reasonably usable document for responsible agencies under CEQA.

It does not appear that the referenced index has been modified in response to either of the City's previous comments in this regards. We still think our comment has value and needs an affirmative response.

8. In my 4/2/96 memo to Ann Hebenstreit on the Admin. Draft EIR for the Plan, my comment no. 2. stated as follows: 8

Reference the comment #2 in Marina's 2/7/96 NOP response -- We do not find that the California Avenue link across Polygon 7b between Reservation Road and the Armstrong Ranch (shown on the 12/20/95 Draft Land Use Concept: Ultimate Development as a dashed black line) has been specifically addressed in the DEIR from a biotic or other standpoint. If it has been addressed and we have overlooked it, please guide us to where it is treated. If it has not been addressed from a biotic or other standpoint because it created no significant impacts, please confirm this with us also.

If I recall the timing correctly, I called EMC Planning, Inc. in July or August to inquire if they had specifically addressed this Californian Avenue link in the DEIR. I received a call back from Matthew Sundt who said that this had not been addressed and I should comment on this in the City's comments on the DEIR. Therefore, we ask again that this be addressed as we had asked in April. If this California Avenue link has impacts which have not been addressed in the DEIR the impacts must be addressed. This link and addressing it in the DEIR is important to the City of Marina and your DEIR will be deficient if this is not done since this Californian Avenue link is included in the FORA ✓

road network.

9. In my 4/2/96 memo to Ann Hebenstreit on the Admin. Draft EIR for the Plan, my comment no. 3. stated as follows:

Reference the comment #7 in Marina's 2/7/96 NOP response -- Please clarify whether infeasible mitigation measures from the EIS/DEIS are overridden by new mitigation measures in the DEIR, eg. clarify that the DEIR mitigation on page 4-26 overrides the DSEIS (page 5-19) and EIS (Vol. I, page 6-28) mitigation for soil loss "limiting development to existing urban areas or degraded open space".

If this point has been addressed and we have overlooked it, please guide us to where it is treated. If it has not been addressed, please do so.

New Comments on DEIR

10. Page 1-9, Table 1.9-1 - Any such index needs to provide appropriate references to the latest Army SEIS of record, which is now the Army's Fort Ord Disposal and Reuse Final SEIS dated June, 1996. This Final SEIS needs to be the version of the SEIS incorporated into the Plan EIR.

The City looks forward to working with the FORA Board, Staff and consultants during their consideration of and response to the concerns expressed in this letter in the hopes that FORA will arrive at a final Plan and EIR which can receive the full support of the City. Please feel free to contact me if you have any questions about these comments.

Sincerely,



JEFFREY P. DACK, AICP
DIRECTOR OF PLANNING

cc: Mayor and City Council
City Manager

to the Salinas Valley agricultural activities via Blanco Road, these locations are well poised to capture the light industrial/business park market.

Projected Land Uses:

Business Park/Light Industrial Land Use. Approximately 48 acres are projected for this use accommodating 421,000 sq. ft. of this use.

Development Character and Guidelines - To achieve the community design vision, the City of Marina is encouraged to:

1. Coordinate development to promote the design qualities, pedestrian vitality, and visual appearance at the interface with the adjacent UCMBEST Center.
2. Visually screen large outdoor working or storage areas from public roadways or adjacent development districts.
3. Incorporate noise mitigation measures to manage industrial activities to minimize potential adverse effects on sensitive research and development uses in the adjacent UCMBEST District.
4. Provide for a direct connection to Blanco Road for this district to reduce traffic impacts on Reservation Road.

North Airport Light Industrial Tech Center District

This Center ^{may} represent a more long term opportunity because it is not within the existing infrastructure core area and industrial development would ^{initially} require ~~both~~ a connection to Blanco Road ^{and eventually} and a second outlet across Armstrong Ranch to the north. (Note: this site ~~has been~~ identified as an "opportunity site" for visitor serving uses.) ^{also}

Projected Land Uses:

Business Park/Light Industrial Land Use. 113 acres are projected accommodating approximately 1.4 million sq. ft. of potential light industrial and business park land use.

Visitor-Serving Land Use. 200 ^{unit} ~~room~~ hotel with a golf course on a total of 222 acres is projected.

Why are these numbers different?

Development Character and Guidelines - To achieve the community design vision, the City of Marina is encouraged to:

1. Orient development to take advantage of the scenic qualities of this location with views to the Pacific and the Salinas Valley.

Oct 1, 1996

FORA Board —

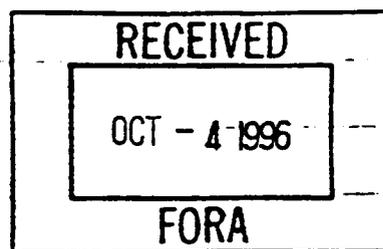
I would like to register my disapproval of the current reuse plan. I have lived on the Peninsula for almost 40 years and shudder to think of the degradation which would occur if these plans are realized.

I urge you to cut back on this grandiose scheme. Let's not turn this lovely spot into another shameless urban sprawl. How about a more modest plan that would safeguard the environment and resources of our very special Monterey Peninsula.

Thank you,

Lisa Hevrik

Lisa Hevrik
35 Linda Vista Place
Monterey CA 93940
(408) 375-7765



deir.upd

(S) MG
10-18
DIT

OCT 04 1996

10-1-96
P.O. Box 713
Carnegie Valley Pa.
93924-0713

Please take a stand and send a strong message to the FORA board to recognize that the FORA DEIR is a fatally flawed document, demand a completely revised DEIR (not one that merely scales back the current document), formulate a realistic plan that uses on-site safe-yield water and gives us full disclosure of environmental impacts.

Sincerely,
Janet G. Oeyre

⑤ MG
10-18
DH

deir.upd

CONSTITUENT REQUEST

DATE: 10/4
STAFF NUMBER: Alexandra Herrera
CONSTITUENT NAME: Sydney Ramscott
ADDRESS: 657 Lyndon
Monterey 93940
PHONE:

Position (A) Information (B) Bill Status (C) Document (D)

VIEWPOINT OR REQUEST

Issue(s)/ Subject(s): (please state)

Fort Ord
the D.E.I.R is bad
wants a
completely revised D.E.I.R

5

MG
10-18
DH

deimpel

OCT. 5, 1996

Dr. Mr. Ferr,

I am writing because I am really concerned about the amount of buildings planned for Fort Ord. A 72,000 person city is too big!

Please take a stand and tell THAT FORA board to:

- ① recognize that the FORA DEIR is a fatally flawed document.
- ② demand a completely revised DEIR.
- ③ formulate a realistic plan that 2 uses on-site, safe-wild water and gives us full disclosure of environmental impacts

We are counting on you.

Thank you for your support!

Sincerely,

Peter Williams

46 Miramonte Rd, Carmel Valley, Ca. 93924

Committees of Correspondence

Established 1763

RECEIVED
OCT - 7 1996
FORA

CITIZENS WHO THROUGH CORRESPONDENCE
ORGANIZED A COMMON RESISTANCE TO
ECONOMIC AND POLITICAL ACTIONS



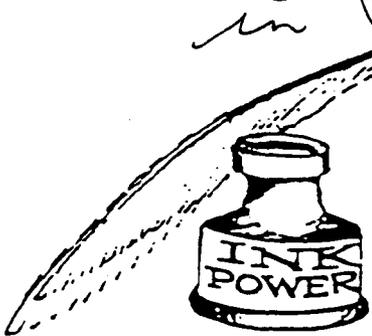
W. Steyer
Ft. Ord RA
"Dear ~~President~~ ~~Editor~~: You know as well as I do ..."

Oct. 4, 1996

Ft. Ord Reuse Authority
I am sorry not to
be able to find
new reasons to
give you about
FORA's Project DEIR
flaws.

However, the many letters to the editor
should have given you more than
necessary reasons to have a complete
revised DEIR, and as was voted for
in the P.C. council,

Don Krag's recent letter points
out the number of lawsuits,
indicating the strong concerns
of local citizens who are
opposed to "hyper-development"



and the misuse of public resources

Plan, please, to think not
just of the almighty dollar - but
of the environment here, and
our way of life.

Toward PEACE
Dorley Cross Wirth

CHARLYNE GAYTAN, 324 Quebrada del Mar Rd 384-1500

I'm impressed by the peninsula cities input, and I want them to continue to input in to the development of St. Old. I want to stress that Marina will follow BEQA and all programs that result in good planning.

Marina has a lot of affordable housing and will continue to address this issue. Marina Coast Water District is in the forefront with water conservation programs of toilet and shower retrofit; reclaimed water use and desal, all endorsed by the Marina citizens.

~~Marina~~ ^{Marina} does need the peninsula support on transportation, to have another road to carry ~~the~~ ^{the} peninsula commuters and tourists thru our city. We would like to see the conversion of St. Ord to give the peninsula that road.

We have the homeless projects before our planning dept and must issue temporary permits on land we don't control. Marina has shown we will be concerned citizens re the development and will listen to input.

We can and will develop as a complement to the peninsula, we have shown that.

Honorable FOKA

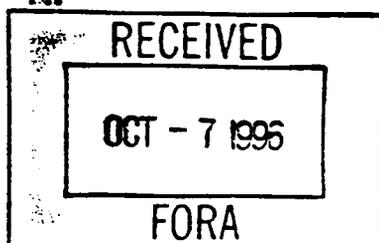
Fort Ord belongs to all U.S. taxpayers, not any single jurisdiction or entity. The FORA Project DEIR is not the kind of economic conversion I had in mind for our military base. This project is not compatible with the original FORA objectives or with CEQA.

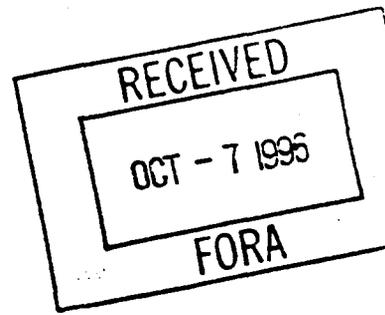
I'm asking you to take a stand and tell the FORA board to:

- 1) Recognize that the FORA DEIR is a fatally flawed document.
- 2) Demand a completely revised DEIR (not one that merely scales back the current document.)
- 3) Formulate a realistic plan that uses on-site, safe-yield water and gives us full disclosure of environmental impacts.

Sincerely,
Bret

LIBERTY & JUSTICE
FOR ALL
Bret Smith
345 Highview Ct
Santa Cruz CA 95060-2303





Sept. 3, 1996

Hon. Sam Farr
1216 Longworth Bldg.
Washington, DC 20515

Dear Rep. Farr:

I am writing you today to urge you to prevent the Fort Ord Reuse Authority's current draft EIR from becoming finalized. It is not the kind of economic conversion residents of the area had in mind for our military base. This project is not compatible with the original FORA objectives or with CEQA, and it seriously jeopardizes our existing industries, tourism and agriculture. The growth rate built into this project is five times our historic rate.

Please take a stand and send a strong message to the FORA board to recognize that the FORA DEIR is a fatally flawed document, demand a completely revised DEIR (not one that merely scales back the current document), formulate a realistic plan that uses on-site, safe-yield water and gives us full disclosure of environmental impacts.

Please respond to me with your stand on this issue.

Sincerely,

A handwritten signature in cursive script that reads "Diana Joy Austin".

Diana Joy Austin
135 Jenne St.
Santa Cruz, CA
95060

cc: Hon. Bruce McPherson
Fort Ord Reuse Authority ✓

Robin M. Keeler, L.C.S.W.

COUNSELING SERVICES
621 FOREST AVE.
PACIFIC GROVE, CA 93950

Hon Sam Farr
1216 Longworth Bldg.,
Washington D.C. 20515

10-3-96

Dear Hon Farr,

I have been following base closure at Ft. Ord like many citizens on the Monterey Peninsula and was pleased when Ft. Ord Reuse Authority (FORA) was created.

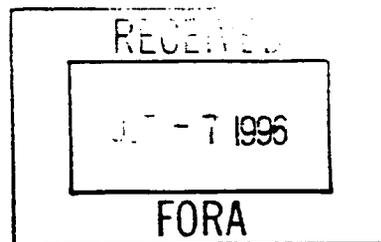
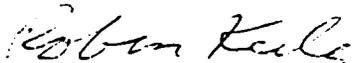
FORA presented its first DEIR for public review on May 31st. The period for public comment will close Oct. 11. I feel that the DEIR must be completely revised.

The current DEIR suggests a growth rate on the peninsula 5 times our historic rate. More time is needed to develop a plan that is more in harmony with the existing economic conditions. The plan needs to be realistic in terms of on site use and we need full disclosure of environmental impacts such hyper development could cause.

Please take these thoughts into consideration.

Sincerely,

Mr. Robin Keeler



deir.upd

POSTED: OCT 7, 1996 AT 5:28 AM 21 LINES
SUBJECT: FORA/DEIR
From: AGross408@aol.com

(S) RD
10/18 AH

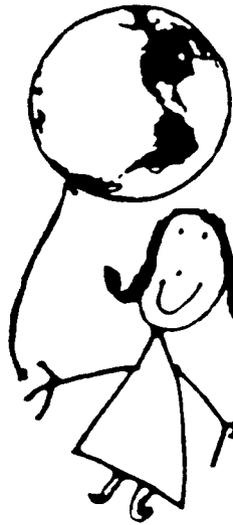
Dear Rep. Farr:

I am concerned about possible overdevelopment on Fort Ord. The FORA Draft EIR is not sufficient or up-to-date, and needs to be revised.

The huge projected growth is not compatible with the original FORA objectives and could seriously hinder our lifestyle and environment here on the peninsula.

Sincerely,

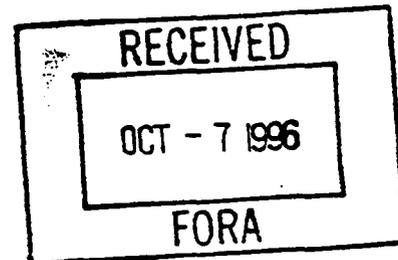
Arlen Grossman 1044 Paloma Road Del Rey Oaks, CA 93940 (408) 394-1422



Children's Services International

a non-profit corporation

October 2, 1996



Mr. Les White
Executive Officer
FORA
100 12th Street
Marina, Ca 93933

Dear Mr. White,

I know that you and your staff are receiving a great deal of written input concerning the Draft Base Reuse Plan, including extensive remarks from the Coalition of Homeless Services Providers in Sandra Reeder's letter of August 29, 1996. However, I would like to submit this follow-on letter to clarify the particular comments found on pages 25 and 26 of her letter. I am referring to remarks concerning the Draft Plan's depiction of a proposed circulation element calling for realignment of the intersection at the corner of 12th street and 4th avenue, which adjoins the Family Services & Child Care Center (see attached map).

We have looked diligently through the volumes of the Draft Plan. None of them appear to have specific circulation element language which addresses this particular intersection. The intersection does appear to be depicted on the maps (e.g., Volume 1, Marina Planning Diagram Figure 3.8.1) as a proposed road realignment across our corner lot.

Sandra's comments also referenced Marina's Preliminary Staff Review (PSR) of our project and the recommendation by the City that approval of our upcoming Use Permit may also require the dedication of our corner lot, based on the proposed Draft Plan map depictions of a road realignment across the property. CSI had previously submitted comments responding to the PSR. Included in our response was an objection, for several reasons, to dedicating any portion of this corner lot for future right-of-way (road realignment). Primarily, imposing such a condition would be detrimental to the use of the property as well as raise safety issues effecting the children on-site.

We are requesting that this particular circulation plan intersection realignment be either deleted from the Draft Plan (intersection remains unchanged from its current location) or an

alternative be ascertained.

Staff at the City of Marina have recently indicated that it appears that their recommendation to CSI to dedicate this corner lot for the road realignment may have been prompted only by the intention to correspond with the FORA Draft Plan's current proposed map depiction. It was suggested that CSI provide input on this issue directly to the FORA staff so that it would not be overlooked amongst the many comments already received from the Coalition and other entities regarding the Draft Plan.

Additionally, Mr. Ray Parks, the architect and partner of Lifespan, the developer for the Cypress Knolls retirement community within the lower Patton Park area, has also raised serious concerns about a possible road realignment at this particular intersection as well as others surrounding and/or potentially accessing the Cypress Knolls community. Based upon the typical traffic patterns a retirement community generates, this road realignment seems unnecessary and depending upon Cypress Knolls final Master Plan, it may not be required at all depending upon the California Street and the Crescent Street extensions.

We realize that you have a basketful of more important issues that require your attention. However, we would certainly appreciate it if you would ask one of your staff members to ensure that this particular issue is addressed with FORA's planners and consultants and that they find a way to satisfactorily resolve it before the final Draft Plans are formulated.

If I may answer additional questions concerning this matter or provide assistance to you, please give me a call.

Sincerely,


Larry Coppotelli
Projects Administrator

Copy to:

Mr. Ray Parks
Ms. Sandra Reeder

3661 70 300

Laura E. Pinkerton
66 Lynne Lane
Salinas, California 93907

dir. wpd

5

MG

10-18

DH

Dear Representative Furr:

I am unhappy with the revised use plan for Fort Ord. This high-impact, dense-use plan will adversely affect our culture and life style here on the Monterey Peninsula. Also, where will the water come from to support all the projected new residents and businesses?

Please assure that the FORA board ① develops a more realistic use plan; one that is more in accordance with the wishes of the residents of this area ② obtains a realistic DEIR, a completely new one that gives us complete and realistic disclosure of environmental impacts.

Thank you,
Laura Pinkerton

deir. vpr

Ian L Warder

1234 Buena Vista Ave., Pacific Grove, Ca. 93950

408-646-5430

(5) MG
10-18
DH

Oct 7th 1996

Hon. Sam Farr,
1216 Longworth Bldg.,
Washington DC 20515

CC - [unclear]

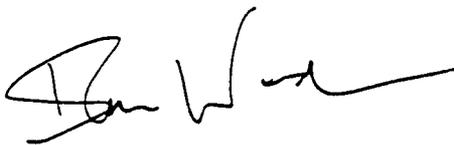
Dear Sir,

The FORA Project DEIR is not the kind of economic conversion that I consider appropriate for this military base. This project is not compatible with the original FORA objectives or with CEQA, and it seriously jeopardizes our existing industries, tourism and agriculture. The growth factor built into this project is 5 times our historic rate. Please inform the FORA board that the FORA draft EIR is a flawed document, that should be completely revised. Insist they formulate a realistic plan that uses on-site, safe-yield water and gives a full disclosure of environmental impacts.

1
2

Please reply informing me of your position and action on these issues. Neither my wife nor I will vote for someone who does not act wisely on this issue.

Sincerely



MINUTES
Fort Ord Reuse Authority (FORA)
October 7, 1996
7:00PM
Monterey Conference Center

The meeting of the Fort Ord Reuse Authority was called to order by Chair Barlich on Monday, October 7, 1996 at 7:00PM in the Monterey Conference Center.

1. Call to Order/Roll Call

Voting members in attendance were: Supervisor Perkins, MONTEREY COUNTY; Mayor Vocelka, Councilman Perrine, MARINA; 2nd Vice Chair Mayor Jordan, Councilman Mancini, SEASIDE; Mayor Albert, MONTEREY, Mayor Pendergrass, SAND CITY; Mayor Styles, SALINAS; Councilmember Livingstone, CARMEL; Mayor Koffman, PACIFIC GROVE; Chair Mayor Barlich, DEL REY OAKS

Ex-Officio members in attendance were: Michael Houlemard, UNIVERSITY OF CALIFORNIA; Hank Hendrickson, CALIFORNIA STATE UNIVERSITY; Ed Gould, MONTEREY PENINSULA COLLEGE; Dave Potter, TRANSPORTATION AGENCY OF MONTEREY COUNTY; Assemblyman McPherson, 27th ASSEMBLY DISTRICT

2. Receive Public Comments on Draft Reuse Plan/EIR

265 Malcolm Crawford, Marina Coast Water District - spoke about how the table 2.5-1, affects paragraph 4.4.1, page 2-20; there should be mention of compliance by all affected jurisdictions with the agreement to annex Fort Ord to the Monterey County Water Resources Agency(MCWRA) zones 2 and 2a. The availability of 6,600afy can be assumed only if the successors to the US Army comply with that annexation agreement. The recent annexation agreement and groundwater mitigation framework between the City of Marina, Marina Coast Water District and MCWRA should also be mentioned, as it makes available to Fort Ord lands 1,400afy potable water from the 900' aquifer. The section should also mention the need for compliance with county requirements for desalination projects and with State requirements for the use of recycled water. On paragraph 4.10.2.9 - biological resources and environmental impacts and mitigation - one of the impacts is listed as the conflict with goals of the Sanctuary Management Plan for the Monterey Bay National Marine Sanctuary. Pages 4 - 143 mention should be made of the need to coordinate the Sanctuary's policies with the probable need for one or more desalination facilities to provide water on the former Fort Ord. The last point under general comments - there should also be a strong water conservation policy and a policy and program for the use of recycled water wherever possible including separate landscape plumbing of all appropriate new facilities. 2 3 4

Edward Botsford - letter attached 265 # 281

Shirley Humann - letter attached *282*

Paul Tyksinski - letter attached *283*

Clayton Anderson - letter attached *284*

Constance Wright - excerpt from AMBAG letter (8-20-96) - attached *167/163*

Mary Condrey - excerpt from AMBAG letter (8-20-96) - attached *167/168*

Laurence Dickey - letter attached *285*

Howard Skidmore - letter attached *286*

Warren Niedenberg - letter attached *287*

Bud Nunn - letter attached *288*

289 Nancy McClintock - you have been asked to look at the ludicrous figure of 71,000 additional people in the previous Fort Ord area but there is the possibility of your summarizing the input from the public and from the agencies in the final EIR and that is absolutely unconscionable, nobody can censor somebody else's work, it just will not do, please bear that in mind.

290 Lavonne Stone - RAB member - her job is to advise FORA, the Army and other agencies as to the condition to the properties prior to transfer by reviewing documents. She has been on that agency for 2 years and has worked as a civil service worker on Fort Ord and as a result of speaking out on these delicate issues and taking to the effected communities the concerns over the cleanup and redevelopment of Fort Ord she was attacked in her work and has lost her job and is now losing her housing which is now part of the university housing. She has heard concerns about housing and jobs which should have been part of this whole process. It is time for someone to take a long hard look at what is going on here and the redevelopment situation here. Jobs and housing for people who are not in upper income brackets should be a great priority.

Terry Olesen - letter attached *289*

291 Bruce Caling - the reuse plan projects that about 28,000 people will be living at the former Fort Ord by 2015 and over time the buildout may be 71,000 residents, approximately 31,500 persons were on base when Fort Ord was a full military installation. Pacific Grove residents are affected by all the development that takes place anywhere in the area and nearly doubling the population over the military base population will have an impact on congestion so he urges the planning process consider having about the same population that Fort Ord had when it was the full military installation.

292, 293, 294

267 Karen Morgan - she would like to reiterate the four main objectives one more time to facilitate the transfer and reuse of Fort Ord, to minimize economic disruption to the area, to enhance our environment and quality of life, to maintain and protect our environmental resources. However, the authors of the DEIR presented two new project objectives - to accommodate regional growth and to develop an economic recovery. In order to determine the need for economic recovery the public has requested data regarding the direct measure of economic impacts of the base closure on surrounding communities. More specifically, the eight cities and county of Monterey were asked to provide economic information for the fiscal years ending 1989 and 1995 including general budgets, sales tax, number of unemployed, school enrollment etc. These were not meant to be rhetorical questions - for the record, this data has yet to be provided to the public.

268 Harvey Kuffner - there is a lot of criticism of the reuse plan and the EIR and he would like to see a successful conversion of Fort Ord from military purposes to civilian purposes. However, the concern is to see it in a rational plan and within the financial and environmental resources available to this community. Secondly, as a member of the Monterey County Board of Education, he is concerned about the lack of information regarding schools that may need to be built as a result of the buildout of the residential area of Fort Ord. He has heard about the sq.ft. for industrial and commercial and residential area but not heard about school needs. Once you have residents you need schools, you need to set aside property for school development and you need financing to build those schools.

Darby Worth - letter attached # 290

269 Curt Gandy - brought to the attention of FORA a recent statement by the Dept. of Defense on policy / responsibility for environmental cleanup due to changes in land use after transfer. FORA needs to be aware of that the FORA reuse plan, as it pertains to the cleanup of Fort Ord, is two years old at least. The level of cleanup that is ongoing is outdated. The Army Corps of Engineers stated that any land within the boundary of Fort Ord should be considered a potential unexploded ordinance site. The DOD draft military range rule says "although there are already several risk assessment models for ranges under various stages of development, none comprehensively addresses the risk proposed by both military munitions and chemical weapons material." Those sites are yet to be identified. The current DOD policy states that the military does not intend to come back and clean up if reuse changes and if we are working off a two year old reuse plan then we may become liable for a cleanup that didn't occur. FORA draft EIR states there is no significant effect on the environment due to unexploded ordinance and the unexploded ordinance map is not accurate. It does not show sites on Fort Ord that have unexploded ordinances. Therefore, FORA's EIR is inadequate because it fails to identify exposure to UXO a significant effect. The EIR fails to consider mitigation measures or alternatives designed to reduce or eliminate that significant effect.

Don Carr - letter attached *ALC # 291*

Peggy Jorgensen - letter attached *ALC # 292*

270 Kay Kuffner - concerned about both the quality and the quantity of water. In the Army's final SEIS, it refers to the discovery of a silty aquatard in the 180' aquifer. What is a silty aquatard, what portion of the 180' contains the silty aquatard, who discovered it and when, and is its existence significant. Is it discussed in the DEIR, if not, please address the issue in the final revised EIR.

271 Mark Evan - there has been an oversight with the veterans to let the cemetery issue get this far ahead without a location being set aside. We are now concerned about approx. 200 acres to be set aside for a vet's cemetery, and if there is 200 acres or larger they can receive matching funds from Dept. of Veterans Affairs. He mentioned the SEIS and was informed the reuse map from FORA did not mean anything to the Army and to throw it away. Which document do we use - Dept. of Army or FORA?

Linda Anderson - letter attached *ALC # 293*

272 Arthur Middeldorf - on behalf of the Sierra Club on August 31, 1996 in the Herald it was noted there are 21 housing units in Abrams park located next to a landfill which were "so beyond repair that they will have to be demolished, those houses broke apart as they settled on the Army landfill underneath them". Are there more such houses and what are the safety and health considerations for those? He also supports and endorses a comment from Walter Wong of the Health Department. "The EIR of the proposed plan needs to clarify the manner in which water will be made available to the area's plan for the development within Fort Ord. Water supply and delivery should be identified and a provision of such should be guaranteed prior to approval of development. Potential alternative sources of water should be described with priorities given in some rational and explained manner. The EIR should identify environmental issues and potential constraints that can be identified at this time relative to the delivery of water from each potential source of water." The Sierra Club has been interested in the water issue and it is gratifying to learn that the Health Dept. shares its concern.

Michael Meuser - letter attached *ALC # 294*

273 David Sevier - USN retired, for five years he directed the Defense Health Resources Study at NPS. While he was there they looked at the Fort Ord closure and that closure created an opportunity to look at how health care could be better maintained for the 30,000 military retirees and active duty beneficiaries that would still remain in this area. They looked at the potential for creating a VA clinic and that has now occurred. How can we continue to address the health care of military beneficiaries in this area? A non profit organization was formed to do this called MoreHealth. The Board of MoreHealth are representatives of local hospitals, businesses, politicians and a number of people who are very interested in the health care of military beneficiaries. One of the projects

270, 271, 272, 273

that was necessary was the development of some of the infrastructure so they looked at how a retirement community could be developed. A developer came in to look at the north side of the garrison at Patton Park. Patton Park would be a positive thing to see developed but because this reuse plan is being held up, we are not able to serve the people who need to have health care and retirement services. We encourage you to say, let's let some things happen because there are some very needy people and they need these opportunities. Please support this project.

Debra Mickelson - letter attached *list # 295*

Chris Keene - works with two non-profits who have property on the base. His concern is the reuse process will not be a timely one and specifically, existing structures and infrastructure are continuing to deteriorate and will not be serviceable. The McKinney properties, some of the university properties and others all have housing or other structures they want to convert. These are currently deteriorating. He encourages a timely approval of the plan, which will also eliminate vandalism and theft. *letter attached - list # 296*

Clark Beck - spoke about the 1000' right of way on Fort Ord. He has asked questions at public hearings and got vague answers. Mr. Beck then spoke about contacting Caltrans and is still not satisfied with his answers. This project is bigger than anyone thinks it is and we do not have the resources for the proposed buildout.

Robert Lewis - is planning to relocate to Fort Ord as a transfer student to CSUMB. He wants us to avoid the "us-them" mentality. Concerning the golf courses, if you put a golf course on sand, all the fertilizer will go through the sand and pollute the water. You also have two proposed sites for alternative high schools, which has volatile clientele which you import from surrounding communities.

John Fisher - major concern is how many people will be on the peninsula in the future. In 1991 there was a little over 152,000 people, now for Seaside and Marina to recover, which is part of what this is all about and he supports that - how far do you go to bring about that recovery? Do you end up with 7,000, 15,000, or 70,000 more people than the 1991 baseline figure. That is a critical thing. If Seaside and Marina come back to their 1991 levels and Fort Ord has 31,500 mix of people living there, isn't that when it is a good time to start talking about what more is needed for recovery of their economies and tax bases. There will be a completely different mix of people from what was there before. No one talks about the difference in the lifestyles of these people and how it will effect the businesses and the environment. There is nothing mentioned in the EIR on this subject. How many students are 10,000 FTS? Remember, whatever ends up in the plan is what is going to be in the general plans of the adjacent cities. This will ensure that the environmental quality and social life of this peninsula is not destroyed.

10/2/91
Charlene Gaten - wants to see Marina follow all the rules of CEQA and the cleanup and it has a track record that they will do this. Marina is a progressive water district that has set in motion many water saving programs. There is also recycling and a desal plant.

277 We have buildings out there that are deteriorating and the homeless need their funding. She wants the peninsula cities to be concerned about the transportation problems of Marina. They come through Marina and Marina pays for this. She urges us to move forward with this reuse plan.

Grace Santella - member of the Marina Planning Commission - they have had a McKinney Act project come before Peninsula Outreach and they have granted approval to the project. How is it that a McKinney act project can come before the City of Marina, go through the planning process, go to the city council and get its approval without a Fort Ord reuse plan being adopted? It is also important that the audience here understand that particular project and future McKinney Act projects. One of the conditions of approval by the planning commission was that public safety would be provided by the Sheriff's department. Marina does not have the funds or the manpower to provide this. The rest of the peninsula needs to understand there are projects moving along on Marinas property for which we have to provide services. *letter attached - see # 297*

California Native Plant Society - letter attached *see # 298*

Jeff Davi - letter attached *see # 299*

278 Christine Bettencourt - believes the DEIR assumes that the Fort Ord landfill hazardous, contaminated toxic cancer-causing wastes are being cleaned up to a standard that will accommodate the present and future reuse plan. This is simply not true. Two reports were submitted - 1990 US Army Corps of Engineers preliminary site investigation report and August 7, 1996 EPA id# 7210020676 report. These are not available locally. They show the reality of the level of contamination that the cleanup process does not reflect because the cheapest and least effective methods have been chosen to be used, therefore, it effects reuse since the area may still be contaminated. I urge a hold on all progress until this information can be thoroughly addressed in the DEIR. Any other action could be "reckless and deadly". *(copy of reports available at FORA offices)*

All also attachment I located at end of comments

Bill Woodworth - he is now working on a program of an EIF - Execution in Frustration and there is a formula from 1 to 10. We need to focus on getting a plan. *letter attached - see # 300*

279 Richard Bailey - you should revise the EIR to develop a reasonable plan because of water. We are not just talking about Fort Ord we are also talking about Castroville, Salinas, Gonzales, Soledad, Greenfield, King City, etc-. Specifically, to Fort Ord, our potable water comes from three wells, all of which are located in the 180' aquifer and all of which are likely to be contaminated very soon or there will be intrusion of the seawater. The more immediate issue is that you are paying a lot of money for local clean up, and not paying sufficient attention to the toxics and heavy metals.

280 Ray Parks - he is equally concerned about the quality of development that will happen in Fort Ord. So far, not many want to talk about that. Traffic and water seem to be the only thing we care about and that is not the case. Seaside and Marina are in trouble,

280 they need quality projects to improve their economies. You can't analyze project EIRs or master plans merely by the numbers. If you analyze Carmel who has more retail per capita than anyone else or more hotels than anybody else, you would walk away from Carmel thinking it was nothing more than a mall built very close to the Ocean. There are more issues involved than traffic and water. It is basically a good plan and it can work. Compromise is afoot but we should be concerned what quality of life we have if Seaside and Marina can not develop. Most of the arguments are between "us" and "them" - and that is not productive.

3. ADJOURNMENT

The meeting adjourned at 8:45pm

4. NEXT MEETING DATE

Establish October 11, 1996 at 4:00pm as the date and time of the Authority's next regular meeting.

Minutes prepared by Susan Sullivan on October 20, 1996

Approved by 
Les White

EDWARD A. BOTSFORD

Box 4293
Carmel, CA. 93921-4293

October 7, 1996.

Fort Ord Reuse Authority
100 12th Street Building 2880
Marina, CA 93933

As we know the Reuse Plan described in the Draft EIR is being built on a former military base. The Army has previously issued its Record of Decision, or ROD, for what is known as the OU-2 military landfill site, which is commonly known as the landfill.

It is understood that since its Record of Decision was published, the Army or its agents have proposed and/or undertaken fundamental changes in the proposed cleanup methodology.

The change which is considered to be fundamental is the creation of a Corrective Action Management Unit, also known as CAMU. We understand that a CAMU is, in essence, a plan to consolidate in the landfill, or OU-2 site, various types of contaminants and toxics removed from other areas of the base.

The current Draft EIR does not discuss the creation of a CAMU at the OU-2/landfill site. The next environmental document prepared by FORA must include information regarding this subject.

The 1996 Draft EIR Figure 3.2.1 shows a golf course on polygon #8a, which is the landfill area. In a *Herald* article dated April 13, 1995, the contractor hired by the Army to plot the extent of Fort Ord's toxicity and help devise a cleanup plan was quoted as saying, "(It) is a habitat area, no golf course will ever be put here. You can't put anything on top of a cap—as far as I am concerned, it's open space". A representative from the state Regional Water Quality Control Board was quoted as saying, "There will be no golf course".

It is requested that the golf course on polygon 8a be deleted from consideration in the next environmental document and removed from the Fort Ord Reuse Plan.


Edward Botsford

cc: Mr. Bob Verkade (Attn: CESPK-ED)
U.S. Army Corps of Engineers
Sacramento District
I 325 - J Street
Sacramento, CA. 95814-2922

October 7, 1996

FORA BOARD & CHAIRMAN

THE PUBLIC HAS SPOKEN OF THEIR CONCERNS ABOUT THE COMPLETE LACK OF ENVIRONMENTAL ANALYSIS OF THE PROPOSED REUSE PLAN'S WATER SYSTEMS, WASTEWATER TREATMENT AND NEEDED TRAFFIC IMPROVEMENTS. WITHOUT FULL DISCLOSURE OF THE PROJECT IMPACTS AN EIR IS NOT LEGALLY ADEQUATE.

WE ARE NOT ALONE IN OUR CONCERNS ABOUT THE OVERALL ADEQUACY OF THE EIR. THE FOLLOWING IS A VERY BRIEF EXCERPT FROM AN AGENCY COMMENT THAT HAS ALREADY BEEN RECEIVED BY FORA REGARDING THE DEIR (as of 9-25-96) THE MONTEREY BAY UNIFIED AIR POLLUTION CONTROL DISTRICT (letter dated 7/12/96) STATES THAT THE DEIR "TRAFFIC IMPACT ANALYSIS DOES NOT INCLUDE THE PROJECT'S IMPACT ON THE EXISTING ENVIRONMENT AS REQUIRED BY CEQA"..AND THAT "IMPACTS OF THE PROPOSED HIGHWAY PROJECTS...ON THE ENVIRONMENT SHOULD BE DISCUSSED AS REQUIRED BY CEQA". THE AIR DISTRICT CONCLUDED: "SINCE MAJOR REVISIONS ARE NEEDED...WE RECOMMEND THAT A REVISED DRAFT EIR BE PREPARED AND RECIRCULATED."

Shirley Humann
PO Box 1565
Carmel, CA 93921

We're here to create a legally adequate environmental impact report that analyzes the environmental impacts of a Reuse Plan as defined by Senate Bill 899. We have four major points to remember:

1. Senate Bill 899 declares four goals: to minimize disruption caused by the base's closure on the civilian economy in the Monterey Bay area; to provide for the reuse and development in ways that enhance the economy and quality of life of the Monterey Bay community; to maintain and protect the unique environmental resources of the area; and to facilitate the transfer and reuse with all practical speed [Title 7.85 chapter 1 section 67651].

2. Senate Bill 899 also mandates that the Reuse Plan must include, among other things: "a land use plan for the integrated arrangement and general location and extent of, and the criteria and standards for, the uses of land, water, air, space and other natural resources within the area of the base. The land use plan shall designate areas...for residential, commercial, industrial, and other uses...". SB 899 also states that "...after [FORA] has adopted a reuse plan, a member agency [that will get land on the base]...may adopt and rely on the Fort Ord Reuse Plan...as its local general plan...until January 1, 1996." [67675.1]

3. An EIR must be a good faith effort at full disclosure of a project's impacts that's prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes into account the environmental consequences of their action. [CEQA § 15151]

An EIR must also focus the project discussion on project alternatives capable of either eliminating any significant adverse environmental effects or reducing them to a level of insignificance. [CEQA §15126(d)(3)]

4. Finally, a program EIR, according to CEQA, should provide more exhaustive consideration of effects and alternatives than would be practical in an EIR on an individual [project]. A program EIR should ensure consideration of cumulative impacts that might be slighted on a case by case analysis. [CEQA §15168(b)] The CEQA guidelines also state that a program EIR will be most helpful in dealing with subsequent activities if it deals with the effects of the program as specifically and comprehensively as possible. [CEQA §15168(c)(5)]

Please understand that the FORA board must comply fully with not only CEQA but SB 899. The public again requests a revised draft EIR that contains an on-site, safe-yield project alternative

Presented by: **PAUL TYKSINSKI**
Address: **18633 TARA DRIVE**
SALINAS CA 93908

Statement for Hearing on Draft Environmental Impact Report
for Fort Ord Reuse Plan
October 7, 1996
Clayton E. Anderson
P.O. Box 5067
Carmel, CA 93921

In the unincorporated areas of Monterey County, any project proposing over eight housing units must address the need for affordable housing for low and moderate income families—sometimes referred to as inclusionary housing.

The project described in the current Draft EIR proposes over 22,000 housing units including the 8,000 units for CSUMB and the remaining 1,600 units within the Presidio of Monterey Annex. This means that over 12,000 housing units are proposed to be b or renovated in FORA's portion of the Reuse Plan.

The Draft EIR does nothing to inform the reader about the mandate to include inclusionary housing in the FORA Reuse Plan.

In fact, the current FORA document states that the cities and/or county "shall identify focused areas to develop inclusionary zoning to encourage group homes" which would allow "flexibility in household size and composition." [Volume 2, page 4-32]

This phrasing would seem to conflict with the existing Monterey County General ✓

Plan and ordinances and this issue must be resolved in the next environmental document.

There has never before been a project of 12,000 housing units proposed in the history of the Monterey county area. There would seem to be a moral obligation on the part of FORA to guarantee that there is a mandatory, 15%-inclusionary-housing-rule enforced by the Reuse Plan. The affordable housing should be dispersed throughout all residential areas that are renovated or newly developed.

The Draft EIR does not discuss whether HUD needs to sign off on the final base reuse plan since this entire process is under BRAC closure law. It is understood that if this is the case, HUD will not agree to a reuse plan with this magnitude of housing that does not adequately address the needs of low and moderate income families in our area. It should also be emphasized that the current DEIR and accompanying documents did project that, of the proposed 72,000 person city, only 407 people will be housed in the units already pledged to the non-profit agencies under the McKinney Act.

LAURENCE DICKEY NOTES FOR FORA PUBLIC MEETING, MONTEREY, 7 OCT
MEMBERS OF FORA , I AM LAURENCE DICKEY, A PENINSULA RESIDENT.

THE PUBLIC IS CONCERNED ABOUT THE MAGNITUDE OF DEVELOPMENT
OF THE PROJECT DESCRIBED IN THE CURRENT DEIR. ONE WAY TO
JUDGE THE MAGNITUDE OF THIS PROPOSAL IS TO COMPARE THE
AMOUNT OF LAND TO BE DEVELOPED UNDER THE FORA PLAN AND THE
LAND DEVELOPED BY THE ARMY. THE DRAFT EIR STATES THAT OVER
10,000 ACRES WILL BE DEVELOPED IF THE 50 YEAR FORA REUSE
PLAN IS APPROVED. IT ALSO STATES THAT THE MILITARY, DURING ITS
80 YEARS OF CONTROL DEVELOPED ABOUT 5000 ACRES. FURTHER THE
FORA DOCUMENTS STATE THE PLAN ALLOWS NEW DEVELOPMENT ON 4000
ACRES OF CURRENTLY UNDEVELOPED LAND. THEREFORE THE FORA PLAN
DOUBLES THE PREVIOUS LAND USE.

INCIDENTLY, MARINA, SEASIDE, SAND CITY, DEL RAY OAKS DID NOT
EXIST UNTIL 1941 WHEN FT ORD BECAME A MAJOR MILITARY
TRAINING AREA WHICH ULTIMATELY ATTRACTED 30,000 PEOPLE

DATA PRESENTED BEFORE THE 1995 VOTE ON THE NEW LOS PADRES
DAM INDICATED WATER WOULD BE RELEASED TO ALLOW A GROWTH RATE
OF 1 PERCENT PER YEAR. THE HISTORIC GROWTH RATE OF THE
MONTEREY PENINSULA HAS BEEN ABOUT 1/2 OF 1 PERCENT PER YEAR.
THE DRAFT EIR FAILS TO SHOW ANY CONSIDERATION WAS GIVEN TO
HISTORIC GROWTH RATE. THIS MUST BE DONE IN THE NEXT EIR.
AND GREAT CARE MUST BE TAKEN TO SEPARATE MILITARY POPULATION
FROM CIVILIAN POPULATION IN THAT MISSING CALCULATION.

AMBAG FORECASTED THIS YEAR A NORMAL GAIN OF 847 PERSONS PER YEAR
BETWEEN 2000 AND 2015 FOR A COMPOUND ANNUAL GROWTH RATE OF 9/10
OF ONE PERCENT NOT THE STARTLING 2.61 PERCENT IMPLIED IN THE
DRAFT EIR.

THANK YOU FORA BOARD MEMBERS, FOR LISTENING TO YOUR CONSTITUENTS
AT THE SEVERAL HEARINGS AND YOUR MEETINGS WHEREIN WE OBJECTED
TO THE SIZE AND BASIS OF THE REUSE PLAN AND ERRORS AND OMISSIONS
IN THE EIR PREPARED BY YOUR HIRED FROM THE OUTSIDE PLANNERS.

YOU NOW ARE ASSURED THE MAJORITY OF THE PUBLIC WANTS THE
MAJORITY OF YOU TO REJECT THE CURRENT PROPOSAL IN FAVOR OF
AN ALTERNATIVE WHICH REFLECTS AND PROTECTS THE AGRICULTURAL
AND RECREATIONAL CHARACTER OF THE MONTEREY PENINSULA WITHIN
ITS NATURAL LIMITATIONS WHILE IMPROVING ECONOMIC AND SOCIAL
CONDITIONS OF MARINA, SEASIDE, SAND CITY, DEL REY OAKS OVER
WHATEVER THE DEPARTED MILITARY MAY HAVE CONTRIBUTED.

Fort Ord DEIR Hearing 10/7/96 - Rights

Certification of an environmental impact report and the adoption of a reuse plan will allow FORA to negotiate with the Army for land that is in the adopted Reuse Plan that has not already been turned over to entities like CSUMB and UCMBEST. Once a Reuse Plan is adopted and the land is transferred from Army into the hands of FORA, land transfers will follow to the cities and the county.

The current Draft EIR does nothing to limit the immediate sale of any or all lands available to be sold to private developers.

Once this land is in private hands, this will create the developers' "constitutional right to develop the land to its highest and best use."

The current proposed reuse plan contains over 22,000 housing units, 12 million square feet of office park, 2 million square feet of retail, 1,800 hotel rooms and five or six new golf courses. The documents refer to this as the "aggregate totals" or "not to exceed envelope."

Our great danger is that the Draft EIR does not adequately examine the environmental impacts or existing environmental constraints such as: water, wastewater treatment capacity, road improvements, seismic, 30% slope, viewshed protection, oakland retention, soil constraints, proximity to unexploded ordnance or toxic areas. Therefore, it has not been determined reasonably or with any degree of sufficient analysis that the "aggregate totals" are, in fact, achievable. A developer, however, will purchase this land with the presumption that the aggregate totals can, in fact, be built.

This is why CEQA demands thorough and adequate analysis of the environmental impacts of the entire project and requires feasible mitigations to lessen or eliminate the significant impacts of the project—prior to project approval by the decision maker.

The current Draft EIR does nothing to adequately address this basic mandate of CEQA.

Howard Skidmore
26360 Monte Verde
Carmel, CA 95923
625-0450

286

Fort Ord DEIR Hearing 10/7/96 - Hazardous Areas

A newly released Army document "Final Supplemental Environmental Impact Statement, Fort Ord Disposal and Reuse" states, on page ES-5: "Additional development adjacent to the island ranges would increase potential for exposure to ordnance and explosives."

The document issues this warning about the December, 1994 Fort Ord Reuse Plan which had 3,000 housing units and 26 million square feet of office park and retail. The current Fort Ord Reuse Plan reduced the office park and retail to 14 million square feet, but the housing units increased to over 22,000. And, the current plan spreads housing units more widely on vacant land that is in closer proximity to the unexploded ordnance fields and other toxic sites.

The Draft EIR fails to provide evidence of the availability of 18,000 acre feet of water, the availability of 11,000 acre feet of waste water treatment, or the feasibility of new and expanded 2-lane, 4-lane, and 6-lane road systems to service the proposed development.

The public has requested a revised draft EIR that adequately examines the environmental impacts of project infrastructure. Further, the public has requested that the revised draft analyze a project that is based on on-site, safe-yield water supply. This revised draft EIR must realistically acknowledge the constraints presented by the existence of unexploded ordnance fields and other toxic sites.

In other words, civilian reuse of the former Fort Ord must be precluded in areas proximate to identified hazardous areas.

297 Warren Niedenberg

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The PGRA urges

~~We urge~~ you to step back, re-consider your charter, and compose a plan that indeed seeks ~~to~~ economic recovery, ~~and little, if anything more~~ - a plan that is strictly constrained to be achievable with existing infrastructure, financeable without undue additional public taxes, and buildable without adverse environmental impacts.

BUD NUNN

85

Chairman Barlich and Board Members
Bud Nunn speaking as President of the Pacific Grove Residents Assn.

This morning the PGRA forwarded its comments regarding the plan and its DEIR. As the cover letter to our report states, we believe that events evolving at the former fort are bound to seriously and permanently affect the quality of life throughout the Monterey Peninsula, and beyond, and both the Plan and the DEIR are vitally important to our membership.

A broad concern of the PGRA is that FORA may have ~~not~~ exceeded its charter in proposing such a huge and far-reaching project. We view the plan not as a framework for seeking economic recovery but as a strategy for creating a booming metropolis in the midst of what would, if the plan goes forward, become yet another formerly beautiful California coastal community.

We also ^{observe} ~~note~~ that both the scope and nature of the plan are parochial. Virtually all significant problems attending the implementation of the plan would be, by their

portation, waste water treatment, solid waste disposal, air quality, transit, and so forth. Yet in the plan and in the DEIR very little notice is given to the needs and concerns of nearby communities other than those that would inherit the property.

The depth and breadth of our concerns are revealed in the 48 questions asked in our report. Tonight I will only mention one more concern, and that is the "buy now pay later" mind set that pervades the text of the DEIR. Both financial burdens and the prices of multiple significant adverse environmental impacts receive little more than hand-waves in the DEIR -- they are left to future and sparsely defined agencies and citizenries.

Given the scale and futuristic nature of the developments proposed in the plan and its DEIR, and their virtual indifference to the burdens they would impose on this rare and endangered region, the PGRA sees the "buy now ~~and~~ pay later" approach as sinister in the extreme.

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Dear Tom Datto & Lizzy

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12

Public Process is contaminated

AB → Fed EIS → Draft EIR

When I initially got involved in the RAB process, Curt Gandy a then-RAB member, handed me a letter he got from a high level army official Togo West; the letter from ERCLA, basically promised: "the Army **will take strong steps to Fully Involve the Public in Risk Ranking and Relative Prioritization of Site Areas** at Ft Ord as well as other Army Superfund areas.

2

Those were giddy days back in early 1994. However over the last ~~23~~ years, I've been taken aback.

Ft Ord

Public Involvement by the local/Installation "Environmental Office" has been poorly done and sometimes manipulated to the point of violating if not the spirit of CERCLA and the actual letter of CERCLA, FEDERAL LAW.

CERCLA stands for Comprehensive Environmental Response, Compensation and Liability Act. It was founded in large response to enormous and terrible tragedies of places like Love Canal, and Three Mile Island when a constant stream of lies was fed to the residents by so called responsible private and government bodies.

CERCLA remains today as a guardian at Ft. Ord to insure a safe, just, comprehensive cleanup transfer takes place **before** reuse is implemented.

In my opinion even if the base cleanup up were as lean and clean as Gail Youngblood, Jim Gillison and Ila Mette-MacCutcheon claim, the procedures for Togo West's Public Involvement have been a joke.

RAB

I was at several of these meetings and their subcommittees. And I processed the events with the training I received in the Master's Program in Public Policy at the Claremont Graduate School. While it is hard to garner public attendance and educate the public in mass, this is what Cercla and base cleanup laws call for. So I applauded the initial effort for the formation of the local RAB. Seemed to me For a was above board and on the ball.

However the manipulation, favoritism, conflicts of interest and even intimidation I witnessed during the last year still **astounds me today. It just astounds me. ~~You could think we were in the middle ages and feudal warlords playing the peasants and the merchants off against each other!!~~ I am also angry. And here's why.

I lived and struggled for a long time in Marina as an employee of the CSUMB, I had a disabled partner at the time and could not afford bottled water; so we cooked, drank and bathed with Marina water daily during 1993-94. This concerns me b/c another person tonight Christine Bettencourt, has found evidence under F.O.I Act. of high levels of water contamination in the Marina/Ft. Ord aquifers. So I wonder each day now what the contaminants in the water have done to my partner's and my own health. And I

or if see the
under if the Draft EIR even begins to approach this problem.

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As Scott Allen, a RAB citizen member pointed out in the Coast Weekly of two weeks ago, RAB members have not had the expertise required, to help the RAB and BCT make those vital evaluation and prioritizing decisions Togo West talked of.

And, as I point out in my article ^{جملہ کا ذکر کریں} in the Post, neither has an independent credible body, been constituted in order to judge and weigh those comments when proposed plans or records of decision are reached. And this is because the RAB has degenerated (or intentionally split) into two factions-- those who ask independent questions about cleanup, and those who smell the sweet loam of excavation for golf courses, and hotels and want build out at any price, any price. Those citizens who are nonaligned have either gotten exasperated and quit or been drifters in and out, lending a kind of permanent instability to the board. And a way for the Ft. Ord Environmental Office to let things decided their way by constantly manipulating quorum figures even when fewer than 8 or 9 people are present.

don't think that need be the case here. I've worked with other public process mechanisms in Environmental disputes and can tell you that even if not everyone obtains their most desired result, everyone can come away at least being fed a main dish. There are legions of case studies out there, where environmental justice is approached if not achieved despite lengthy public involvement processes.

So to sum up, This RAB and indirectly FORA, has failed to involve the public in the evaluation of cleanup at Ft. Ord. The weak and inconsistent data inherent in the federal EIS has now found ^{Draft} its way into the present EIR and therefore is seriously flawed.

Despite what the DEIR says, base/Marina/Seaside water quality has been compromised by lax and poor disposal methods and will be further compromised by the inadequate OU2 landfill which has still not been completely and adequately assessed. Further, without adequate lead and ordinance map overlays tied to reuse map overlays, and without independently and accurately derived water data I believe Ft. Ord still remains a toxic threat to human health.

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I sincerely hope the members of FORA will take steps to dissolve the present RAB and reconfigure a new body of independent experts, along with new applicants from both the public and Army/DoD. If that cannot or will not be done then immediate calls by the public for an independent blue ribbon commission to investigate CERCLA violations and malfeasance should be undertaken, perhaps by citizen initiative, referendum or recall.

Terry Olesen
Citizen of Carmel Valley
Submitted to FORA Hearing, 10/17/96, Monterey, CA
209-21

The responsibility of the civilian community in a base closure process is to prepare a local Reuse Plan and an adequate EIR that analyzes the impacts of building the reuse plan so that, in this case, Army can negotiate with FORA to determine precisely how much land is going to the cities and the county, and how that land will be developed later by individual land owners and developers.

CEQA mandates that an EIR assume that the entire project will be built and mandates full disclosure of the project impacts. CEQA states that it is not mitigation of a significant environmental impact of a project to say that if an impact is not addressed then the project will not be built. [CEQA § 15144]

As the recent Stanislaus case reminds us "it's crucial...for a government decision maker to know what the 'project' is that the decision maker is approving... [O]nly through an accurate view of the project, may affected outsiders and public decision maker balance the proposal's benefit against its environmental costs, consider mitigation measures, assess the advantages of terminating the proposal... and weigh other alternatives. [CEQA § 15168]

This draft EIR is inadequate because it purposely defers the identification of significant environmental impacts until the lands taken for private development are in the hands of the cities and county. It eliminates FORA's right to understand the consequences of its action. And worst of all, it's a blatant attempt to get the lands into the hands of private developers. This will create the private land owners' right to develop to the best and highest use - the "aggregate totals" established by this EIR and this project description.

Once this process moves beyond FORA and becomes the project approval process of the individual cities of Del Rey Oaks, Marina, Monterey and Seaside and the County, the public's ability to efficiently and effectively participate in the public hearing process will be thwarted and prejudiced.

In other words, FORA was purposely composed of eight cities and the county so that the public that resides in the Monterey Bay area could have one legal governing body that would hear its concerns and comments. FORA must be given a reasonable range of project alternatives and must be given an adequate environmental impact report.

Presented by: *Darby Worth*
Address: *8250 Camino Estrada
Carmel
93923*



Subject: Fort Ord Reuse Agency (FORA) Public Hearing on the Draft Environmental Impact Report (DEIR)

Date: Monday, October 7, 1996

COMMENTS REGARDING UNCERTAINTY IN THE DRAFT EIR ABOUT THE LOCATION OF A DESALINATION FACILITY, INCLUSION OF A ROADWAY THROUGH THE DUNES STATE PARK CONNECTING SAND CITY TO MARINA AND THE LOCATION OF THE MAIN ENTRANCE TO THE STATE PARK.

1

In a letter to FORA dated July 14, 1996, the California Department of Parks and Recreation noted that . . . "The preliminary State Park plan acknowledges that development of the future 23 acre desalination facility site will be accomodated in the State Park if it is determined not to be feasible to locate it east of the freeway . . ."

The current draft of the EIR provides no alternate site for the desalination plant east of the freeway. Does this indicate a decision has been made to locate the 23 acre desalination facility west of the freeway in the new State Park?

2

The preliminary plan for the State Park does not include a road that was proposed to connect the hotel and recreational facilities planned for the cities of Sand City and Marina. The road would have dissected the sand dunes in the park. The state Department of Parks and Recreation has wisely noted that the road would have had a significant impact on the park." Has this roadway been deleted from



the plan altogether?

2

The Department of Parks and Recreation also notes that the main entry to the park has been shifted from 1st Street to the 8th Street overpass. Does the FORA board concur with this decision to choose the 8th Street overpass as the main entrance to the State Park? And does the current draft EIR project description indicate 8th Street as the main entrance to the park?

3

Thank you for your attention to these inquiries.

Don W. Carr

Fort Ord Reuse Study Group

(17)

Fort Ord DEIR Hearing 10/7/96 - General CEQA

Members of the public have spoken at the three special meetings (7/1/96, 8/17/96, 8/22/96) including one where the FORA board was not present — to express their concerns regarding the Fort Ord Reuse Plan Draft EIR published 5/31/96.

We have spoken of the basic requirements of CEQA: the need for an EIR to fully disclose the environmental impacts of this project's water, wastewater, and traffic systems; and the need to provide reasonable project alternatives that are adequate to meet not only the requirements of CEQA but Senate Bill 899.

We have stated clearly that this Draft EIR fails to meet the requirements of CEQA and falls so short, that the flaws cannot be remedied in a final EIR.

There is no mandate under CEQA to circulate a final EIR for written comments. Therefore, should the public and government agencies feel that the Final EIR is still seriously flawed and not legally adequate, the decision makers must call for a new document to be prepared. Or, if the decision maker, in this case, FORA, votes to certify a legally inadequate document, the only recourse for the public is a law suit.

Obviously, all this can be averted by calling for a revised draft EIR.

We know enough now to understand the fatal flaws in this draft EIR. We have heard the defensive posturing by the EIR authors and can believe that they have been, and are, unwilling or unable to comply with CEQA, that is, to produce an unbiased document that is a good faith effort at disclosing the significant environmental impacts of a stable, finite, project description.

*Peggy Forgiven
Carmel, CA*

(22)

**Statement for Hearing on Draft Environmental Impact Report
for Fort Ord Reuse Plan**

**October 7, 1996
Linda C. Anderson
P.O. Box 5067
Carmel, CA 93921**

The current DEIR preferred project requires 18,000 acre feet of water at build-out. The DEIR states that a water alternative is "importation of water from other sources." If no dam is built on the Carmel River, and if no more than 6,600 acre feet is taken from anywhere in the Salinas Valley basin, and if 3,000 acre feet of the total 18,000 acre feet is, in fact, reclaimed water, this leads to the following conclusion: a desal plant must yield over 8,000 acre feet per year.

It must be said that we would be the first and only area in the United States to have a desal plant this size. And we would be the first and only area in the United States to build a desal plant to create growth of an urbanized city.

The Draft EIR does not provide a specific location west of Highway 1 for the plant. It doesn't describe how large the building needs to be, whether large power lines are needed, what its outside lighting requirements should be. It doesn't describe the compatibility with the future state park that will take over the sand dunes west of Highway 1.

The DEIR informs us about the high potential of seismic and liquifaction hazards. This would lead the reader to believe that the sand dunes are an undesirable location for this vital utility plant. There is no data about the need or feasibility of a power back-up system in case of a prolonged

power outage, like the three days following the Loma Prieta earthquake. No data is provided regarding requirements for emergency storage facilities for both potable and fire-fighting capability given a prolonged power failure, and or a prolonged period of operational down-time that is known to occur with smaller desal plants that have existed in the United States.

No information is provided regarding outfall and intake lines: for example, whether they would be allowed in the National Marine Bay Sanctuary; whether there is space to construct Raney pipelines underneath the sand dunes; no data is provided from Cal Trans to assure their support for construction of transmission lines to the east side of Highway 1. The DEIR is inadequate.

Today there is no privately owned land on the former Fort Ord. No individual person, small local developer, or huge out-of-town developer owns one square inch of Army land.

Years ago the Army environmental impact statement told us that the reuse of the base by civilians and the mitigation of the impacts of the reuse was not an Army responsibility.

So the local community has waited for an environmental impact report that would fully disclose the impacts of a proposed reuse plan, would provide a reasonable range of project alternatives, and that would provide feasible mitigation measures. Unfortunately, years and million of dollars later the public is still waiting.

The draft EIR released on 5/31/96 presents an "ignorance is bliss" version of CEQA. We'll ask FORA to approve the "aggregate totals" for development now- and promise to tell the public about the impacts later on a "project-by-project" basis. Under CEQA, this is called piecemealing and is prohibited because it allows decision makers to hide the cumulative impacts of building, in our case, our gleaming 72,000 person city on the hill.

This technique of "approve now" and promise to "inform later" is a violation of the California Environmental Quality Act.

This technique also limits and virtually eliminates the authority granted FORA by Senate Bill 899. In other words, if basically all of the environmental analysis is to be done later - FORA will have no say about how well the environmental analysis is accomplished. FORA would also lose any ability to make certain any adequate analysis is ever done.

The technique of "approve now" and "inform later" will create the replacement leg for the military: a full-time army of attorneys.

Presented by: *MICHAEL MEUSER*

Address: *118 KOSHLAND WAY
SANTA CAROLINA, CA
95064*

If there was ever a significant decision by a government agency regarding land use, it's this preparation of an adequate EIR and adoption of a realistic Reuse Plan for Fort Ord.

A foundation of CEQA is full disclosure of the environmental consequences of a project, prior to project approval.

Most future mishaps in the future reuse of the former Fort Ord can be averted by fully complying with Senate Bill 899 and CEQA now.

If we comply with SB 899 and CEQA we will increase the likelihood that we will take only the land that can be reasonably developed over time given a realistic assessment of today's existing on-site constraints and the existing constraints in the Monterey Bay area. We need to know today, prior to any Reuse Plan approval, what the project will look like and how it will affect the existing residents and how it will affect the hospitality and agriculture industries.

We do not have to, nor will we allow, developers to buy land to develop projects that will overwhelm the existing infrastructure, put an unfair financial burden on the existing residents or threaten the viability of our billion and two-billion dollar industries.

The EIR and accompanying documents that were released 5/31/96 are insufficient. Either the time and effort needs to spent now to fully disclose the impacts of building this 72,000 person project.

Or, the project needs to be reduced and the impacts of building that Reuse Plan must be fully disclosed to the public and to FORA .

Presented by: Debra J Mickelson

Address: Box 75a1

Carmel CA 93921

D.E.I.R. HEARING COMMENTS

10/7/96

My name is Christopher Keehn, and I live in Carmel Valley. I am working with two non profit organizations that have been approved for conveyance of land and buildings at Fort Ord.

I urge you to settle the issues that have been raised in public comment hearings and proceed to complete the base closure. The organizations with which I am working as well as other McKinney Act non profit organizations, Monterey Bay Education, Science and Technology Center, and the California State University at Monterey Bay all have structures and infrastructure that are deteriorating as time passes. Eventually, these resources will no longer be salvageable. For example, the senior housing project with which I am working has investigated the sewer laterals and found that they can be currently salvaged, but that they will eventually deteriorate and require replacement costing upwards of one million dollars.

A timely approval of the reuse plan and EIR needs to be completed to avoid the loss of the resource of the existing structures and infrastructure that can be salvaged. Thank you.

Grace silva-Santella
3230 susan Ave.
Marina, CA 93933

408-883-1861

Re: Comment made at 11/7/96 FORA meeting

1. How is it that a McKinney Act project (the specific project being Peninsula Outreach) can be working through the City of Marina without an adopted Reuse Plan and without the area it is located in included in Marina's General Plan?

The project has already been approved by the Marina Planning Commission.

2. Monterey Peninsula residents need to realize that projects like Peninsula Outreach and MIRA are coming to the City of Marina for approval. And that a condition of approval on these projects is that public safety will be provided by the Sheriff Department and not Marina Public Safety because Marina has neither the man power nor the funds to provide the services. Our Public Works Department is unable to properly maintain are current city boundaries because they are pulled to deal with Fort Ord "problems". Our Planning Department is over worked. Much of there time is spent on Fort Ord related projects instead of issues here in the city. This reuse plan needs to move along so that Marina can develop a tax base to service the areas that will be included in its new General Plan.

California Native Plant Society

19180 El Cerrito Way
Watsonville, CA 95076
Sept. 12, 1996

Fort Ord Reuse Authority
100 - 12th Street, Bldg. 2880
Marina, CA 93933

Ladies and Gentlemen:

The Monterey Bay Chapter of the California Native Plant Society appreciates receiving a copy of the FORA Plan and EIR, and would like to make the following comments.

We are very concerned that the preferred alternative, which would more than double the population and jobs at Fort Ord from its highest level under Army jurisdiction, would cause significant and unmitigatable environmental impacts in a number of areas primarily having to do with inadequate and insecurely funded infrastructure. We shall confine our comments to the impacts on natural resources and scenic views, which are of special concern to our organization; but we want to make the case that changes in the plan to meet the availability of water and traffic capacity should be designed to maximize the protection of environmentally sensitive habitat.

The issue of corridors for wildlife, including both plants and animals, is of great interest to us as well as many other groups. The Habitat Management Plan discusses the need for corridors in order to provide avenues for wildlife and plant dispersal and genetic interchange; however, the corridors shown in Fig. 2-3 in the HMP are not incorporated in the FORA Plan as shown in Fig. 3.2-1. The critical corridor from the UCSC preserve to the BLM land is virtually non-existent, while the narrow corridor to the dunes just south of Marina has disappeared. We urge that development in both those areas be resited or reduced to allow for the needed corridors.

We strongly support the application of the Regional Park District for expansion of the Frog Pond Regional Park to include sensitive habitat in the park's watershed. The HMP shows the North-South Road Conservation Area as supporting a high richness of HMP species, yet this important area is largely scheduled for dense development in the Plan. The loss of 1584 acres of unique oak woodland and savanna (1828 with the two additional proposed golf courses) is of great concern to us. Again, we urge the resiting, clustering, or reduction of development to provide better protection for this important community.

Because of the unique character of flora of Fort Ord as well as the need to conserve water, native plants from on-site stock should be used in exterior landscaping, and cultivars of manzanita and ceanothus that could hybridize with the rare natives must not be planted. Any annual wildflower plantings should be from seeds collected on site, not from commercial wildflower mixes. Bermuda, Kikuyu, and Ehrharta grasses must not be used.

Any loss of sensitive habitat should be mitigated by setting aside existing high-quality habitat, not by the promise of creating new habitat. The latter tactic is unlikely to be successful and often merely creates a disturbed site that attracts invasive weedy species.

In summary, we urge you to provide a realistic alternative to the current plan that responds to public concerns about water, traffic, scenic views, etc. By replacing some of the high density development with open space and parks, you can preserve the most critically valuable remaining habitat while greatly improving the quality of life for the residents.

Sincerely yours,

James Pittman
James Pittman, Vice President
Chair, Rare Plant Committee

296



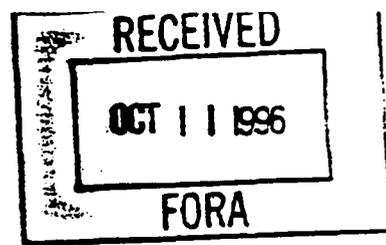
Dedicated to the preservation of California native flora

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JEFF DAVI
POST OFFICE BOX 2350
MONTEREY, CALIFORNIA 93942
(408) 373-2222

October 11, 1996

**The Honorable Jack Barlich and Board of Directors of the
Fort Ord Reuse Authority
100 12th Street Gate Building 2880
Marina, California 93933**

RE: Draft Environmental Impact Report for the Fort Ord Reuse Plan

The following represents comments on the Draft Environmental Impact Report for the Fort Ord Reuse Plan and the Draft Fort Ord Reuse Plan. I believe the plan is too expansive. I understood with the origination of the Fort Ord Reuse Group under the leadership of then Congressman Leon Panetta, the goal for Fort Ord Reuse was to plan for the replacement of the loss of the military. This charge was to ensure swift immediate reuse with a priority of replacing the economic activity lost as a result of the exodus of the military population. The Draft Reuse Plan clearly goes beyond this charge and considers increased economic development beyond the replacement of what was lost. Generally, this is the reason for the public outcry in opposition to the plan and this is the reason for the requests to have the overall plan scaled down in a final version. I believe if FORA begins the process of planning for a more realistic population figure and residential/commercial development, then the process of completing the reuse can continue with widespread community support. If FORA insists on its current plan in terms of population, economic development and build out, then FORA will face strong opposition as it continues to move down the path of Fort Ord Reuse.

The aforementioned represents my overall comments on the draft Reuse Plan. The following represents my general comments on the entire Reuse Plan and Environmental Impact Report:

1. The E.I.R. should show an alternative that recreates approximately the amount of economic activity that occurred on the base during its peak as a military installation. This analysis should state specific limits on growth for jobs, population, housing and commercial development.

2. The obvious limits of Fort Ord Reuse relating to transportation needs to be considered. Existing infrastructure does not accommodate the propose plan and limits should be specifically set on future expansion and use at Fort Ord with a realistic consideration of transportation. Currently there exist no actual funding sources for road improvements and the traffic circulation is insufficient for the proposed plan. The amount of dollars needed to fund the magnitude of improvements necessary to accommodate this proposal could not be raised without significant bonds, fees, taxes and other revenue sources.

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There is no funding for M.S.T. in order to expand public transit at Fort Ord.

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The need for an increased tax base in order to fund transportation infrastructure is depending greatly on initial residential redevelopment. Too much residential development up front in the reuse process may prove more difficult to provide an adequate tax base for revenues.

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- 3 FORA needs to address the issue of density on retail, visitor serving, commercial and other uses with a specific description of the future density for this plan.

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4. The plan may need periodical amendments in order to accommodate future needs of the community. This plan cannot be set in stone, it must be an outline with the ability for modification over time similar to that of a general plan.

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5. Urban development in the county as opposed to development within the jurisdictions must be more adequately addressed in terms of infrastructure, utilities, and public services.

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6. Paragraph 3-2 of the draft E.I.R. does not take into consideration the actual % of proposed activities within the existing open space. If you back out the open space (estimated at 62) then the remaining acreage should be used to determine percentages. Division of acres by use list should be re-calculated.

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7. Should set limits on residential versus commercial development so that all the residential use does not utilize all the available water, leaving limited water available for commercial uses in the future.

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8. There should be a more comprehensive study on water, both existing and potential sources of water. Ultimately, a water allocation needs to be established as an overlay to the entire Fort Ord area. This allocation should take into account the surrounding communities and be offered as a part of the Salinas Basin Water Management Plan.

10

9. Sources and uses of funds for reuse seem random and not sustainable. A more specific outline of proposed costs and uses of needed improvement must be obtained in order to determine a realistic accomplishment based on cost and ability to produce funding. Who is going to buy the land for \$200 million? The source of these funds are skeptical at best. There should be better figures for sources of funding. 11
10. The project alternative of simply replacing what was lost was not studied. 12
11. Cumulative impacts of development were not fully addressed. 13
12. Population estimates are inconsistent with other agencies figures. These figures should be reconsidered with information from other agencies. 14
13. Comparisons of existing commercial availability of space in other areas of the County being compared to what is proposed at Fort Ord should be measured consistently. We cannot compare square feet of commercial space with acres of commercial zoned land. This is inconsistent. 15

There have been many other comments sent to your board throughout this public process. 16
The most overriding comment I have found from the community is that the plan is just too big. It creates a city that is too large for the surrounding communities to accept. I encourage the board to reconsider its build out population figures so that the E.I.R. can be accepted and certified without a public outcry of opposition. The swift immediate reuse of Fort Ord will only be delayed if the community continues to divide itself instead of attempting to build consensus and common ground. The ultimate goal should be "Rational Reuse" at Fort Ord.

Respectfully submitted,



Jeff Davi

Ft Ord Reuse Plan/EIR Comments.

To FORA

From W. C. Woodworth, Aquanet Systems, 654 Sunset Dr. PG 93950
10-7-96

Foreword:

I have written much the past several years on the environmental issues surrounding and including old Ft Ord. However for this exercise, let me just cover a few key issues which may help in the final approval of this DEIR. I have concentrated on the water related issues of water/sewage, drainage, issues and projections into the future for 3 or 4 four decades.

Specifics related to the 33 page Executive Summary of May 1996:

* pages 10-11 Comparison-key impacts

The water supply nos. -need for local water thru the five options

are interesting and reasonable for comparison purposes. However, I have to caution the analyst that these numbers do not reflect other than probable ground water extractions and also little or no water conservation and energy conservation factors considered.

The required water, for all purposes on the base , not drinking water only, should spell out the amount of well or ground water needed but also the recycled sewage and storm water managed at insitu locations. My estimates are that recycled water and strong water conservation program must generate at least an equal amount of well water given suitable economic incentives.

These numbers in the tables need to be clarified and projected in 5 year increments out to a reasonable planning target at least past 2025. Otherwise, more flak will come from the no-growthers and obstructionists to cause expensive delays for any reasonable growth on the old fort.

p 2-11

The storm drainage impact issue is a bit fuzzy and possibly misleading to many . Stormwater management on the Clean Water Act of 1972 has very specific best management practices for cleansing the urban runoff waters and for converting much of such waters to financial benefits, replacing more expensive potable or bottled waters.

Why restrict this Stormwater drainage, including flood potentials, to only 8,701 acres.? When it rains over the Fort, all 28,000 acres receive natural desalinated water from the skies. often generating 40-60,000 acre feet annually regardless what political jurisdiction owns the surface below.

The hydrology and water quality of available waters to the Fort or too nebulous a concept as depicted earlier. A better understanding could be



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emitted to readers if the major functions of these water related utilities: water/sewage/drainage and recycled Superfund waters could be considered under a infrastructure subject subset called aquastructure or shorter- Aquanet systems. Water, storm water managing ,sewer / rates and reuse of **Superfund** toxics cleanup can be a compact packet for funding and managing such water related utilities involved.

It is sad to believe that **62%** of the old Fort, in this EIR planning will not contain any, or sufficient surface water storage and reservoirs for the mass of geography involved, into **perpetuity**. There just has to be a better management process in those acreages under BLM and State Parks.

p 2-20 proposed monitoring mitigation plan does make a stab at trying to establish a "program" of documenting procedures but I don't understand why only 3 political units have the chore and not all FORA policy makers. Further, it does not recognize that a possible role could be done better and cheaper by **privatizing** all or most of the **water utilities networks**.

W.C. Woodworth
W C Woodworth
654 Sunset Dr.
Pacific Grove CA 93950
408-373-4644

10-07-96

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Following are brief excerpts from agency comments that has already been received by FORA |
regarding the DEIR (as of 9/25/96):

The Santa Cruz County Regional Transportation Commission states that the “optimistically
financed” plan “to widen Highway 1 from the Santa Cruz line to Castroville “does not adequately
address the infrastructure needed to mitigate these impacts to the regional transportation
network.”

In addition: The Northern Salinas Valley Mosquito Abatement District (letter dated 6/27/96) 2
states their concern that “mosquito/vector control [is] not even mentioned [in the DEIR]” saying
that “significant effort” has been taken by the U.S. Army Preventive Medicine Group regarding
problem sites like storm drains, catch basins, land abandoned water treatment facilities.

The Army's Final Supplemental Environmental Impact Statement (dated June, 1996) released in September, 1996, refers to the discovery of a "silty aquitard in the 180-foot aquifer." [page 4-12]

What is a silty aquitard?

What portion of the 180-foot aquifer contains it?

Who discovered it?

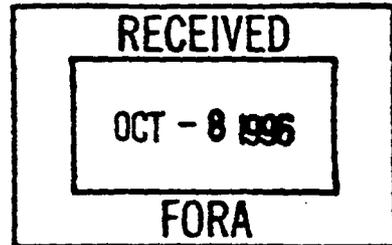
When was it discovered?

And, is its existence significant?

If it is significant, is it discussed in the DEIR? If not, please address the issue in the final or in a revised DEIR.

Oct. 6, 1996

Les White, Executive Director
FORA
100 12th St., Bldg. 2880
Maine, CA 93933
attn: Ann Hebenstreit



Dear Ms. Hebenstreit:

I am truly alarmed by the
DEIR for FT. 2nd.

I urge FORA to prepare a
revised, adequate DEIR, which
analyzes the impacts of water,
sewage, & roads.

I further urge FORA to formulate
a realistic plan that uses m-zets,
safe-yield water & gives us full
disclosure of environmental impacts.

Thank you

Marilyn Beck

MARILYN BECK
528 CROCKER AVE.
PACIFIC GROVE, CA 93950

PREPARED BY _____
DATE _____

1204 Shafter Av.
Pacific Grove CA 93950-5527
408/372-7650
10/8/96

6 Fort Ord Reuse Authority
7 100 12th Street, Bldg. 2880
8 Marina CA 93933

10 Dear FORA Board Members and Alternates:

12 I feel very strongly that the absolute maximum number of
13 people living at the former Fort Ord should never exceed th
14 approximately 31,500 who lived here when Fort Ord was a
15 military base.

17 I firmly believe that we should preserve the quality of life
18 on the Monterey Peninsula for ourselves and future generations.
19 What happens at the former Fort Ord affects the entire area.

21 Every person uses water and creates pollution and congestion.
22 Please do not turn this area into another San Jose or Los Angeles

Sincerely,
Judy Cowan

Judy Cowan

8 October 1996

TO: FORA Board

FROM: Shirley Humann, Fort Ord Study Group Fax 626-9300

The Fort Ord Study Group, an adhoc committee which has been meeting to discuss the DEIR/Reuse Plan for Fort Ord, submits this packet of letters to FORA as evidence of community service and controversy over the proposed project.

It is our intent that these letters be made a part of the public record before closure of the public comment period on 11 October 1996.

By quick count there are 35 letters as of 10/4/96 which are specifically related to the DEIR inadequacy. And of all the letters enclosed, only one can be said to be for the Fort Ord project.

Thank you for your attention.

LETTER BOX

Monterey greedy 7/25/96

Don't tread on us, Monterey! How many more roadblocks must Monterey creatively design to keep Marina out of the tourist trade? There always seems to be enough water for new golf courses and the Rancho San Carloses in Monterey and Carmel. No one in Monterey seems too concerned about the overcrowding from thousands of tourists on the Peninsula each day and more on the weekends.

Where is the anxiety about the environment when our air is polluted by Monterey visitors each day? Stop behaving like the greedy CEO of this Monterey Peninsula corporation!

I propose that Monterey (since she refuses to allow other cities to develop their own tourism industry) should be assessed a "tourist tax" to be distributed to those local cities most affected by the tourist traffic jams and the tourist air pollution.

"Give us tourists and more tourists," the cities of Monterey and Carmel cry out. They're freebasing on tourism. Monterey spends city

funds advertising to the far corners of the Earth, hoarding tourists exclusively to itself. Like a greedy child in a candy store, Monterey won't share her goodies with the rest of us poor beggars.

Does there have to be Balkanization here on the Peninsula to get Monterey's attention? Can't Marina be permitted to determine her own economic destiny without unfair interference from the rich, powerful, elitist cities of Monterey, Pacific Grove and Carmel? We work/live in different parts of the Peninsula. We contribute to her vitality. We need each other's cooperation. Yet, until Marina is treated fairly, must we boycott all business dealings with Monterey and her ilk?

We know they look down on and resent our working-class backgrounds and we're cognizant of their prejudice against our racially-diverse community but we should no longer accept their contempt for our sovereignty as an independent city!

Merlin A. Noggle,
Marina

LETTER BOX

Reduce reuse plan

Are public officials in this county listening to each other?

On the one hand, we have the Fort Ord Reuse Authority board projecting a city of 72,000, using as much water as the Peninsula now uses and doubling the amount of development of the former Army base.

On the other hand, the Transportation Agency for Monterey County has a document, Fort Ord Transportation Study, which envisions the necessity to spend \$800 million by the year 2015 on road improvements.

An elected official who, in the past, has been a supporter of the massive reuse plan, expressed great shock at a recent TAMC meeting over the large price tag for road improvements — improvements which are essential if the Fort Ord Reuse Plan is adopted as written.

Finding the amount of money needed for transportation improvements may be impossible. It is critical that all public officials involved make the connection between holding out for an impossible reuse plan and being presented with an \$800 million bill.

This can be resolved by reducing the reuse plan to the existing level which would not necessitate the \$800 million expenditure.

The draft environmental impact report must be revised to include adequate environmental analysis of the impacts these project road improvements would create.

Robert E. Kohn,
Carmel

Serious EIR needed

I feel great concern about the handling of Fort Ord land. As a longtime resident, I selected the Carmel area for certain qualities of lifestyle. It would seem, without question, necessary that a serious environmental impact report be done and studied carefully as to the impact on water, sewage and roadways. Unless serious study is given to this, the whole way of life could be ruined!

Elaine F. Newsom,
Carmel

A developers deal

In a recently released transportation study (Monterey County Herald of Sept. 25), we are told that nearly \$1 billion in regional transportation projects are envisioned by the year 2015. These extensive improvements

are needed, we are told, to "meet demands of redevelopment of Fort Ord and normal growth of the county."

We are also told that developers at Fort Ord would be expected to pay \$151 million as their share of transportation improvements. This means that the developers, who stand to profit the most from the huge redevelopment at Fort Ord, will be paying approximately 15 cents on the dollar for their privilege to develop.

Residents, however, of the cities and county areas nearest Fort Ord are expected to pay almost twice as much — \$252 million for transportation improvements. If residents of those communities stop and think about this, they may reconsider supporting the full build out (city of 72,000) envisioned by the Fort Ord Reuse Plan.

What a deal for developers!

Larry Kane,
Carmel

Can't carry the load

We are writing to express our deep concern of the Fort Ord Reuse Plan. The lack of responsibility for keeping the magnitude of Fort Ord development within the reasonable bounds of resources available and the lack of any foreseeable way of creating those resources are alarming. We can no longer afford the luxury of assuming we can solve the resources problem at a later date. We do not have a water supply that would provide for the present population during a drought period. How can we assimilate 70,000 more people?

Ruth Fraser,
Carmel

LETTER BOX

Evident contradiction

At the Sept. 13 Fort Ord Reuse Authority (FORA) board meeting, California-American Water Company (Cal-Am) disclosed its ability to provide "system interties" that could take water from Seaside and Ryan Ranch and deliver that water for new development on Fort Ord. Due to FORA-imposed time constraints, the presentation had to be brief, so we don't know how much water they are talking about delivering. But Cal-Am said that each of these interties was an "independent water source."

Aren't both Seaside and Ryan Ranch within the purview of the Monterey Peninsula Water Management District (MPWMD)? Cal-Am and the State Water Resources Control Board continue to tell us that MPWMD users have a severe water crisis. And yet we heard Cal-Am say that there is water for new development available from Seaside and Ryan Ranch.

Can there be a water crisis and water available for new development at the same time? Are we missing something? Perhaps FORA can do some explaining at its next (and last) public hearing on the Draft Environmental Impact Report for the massive Fort Ord project. Come to the Monterey Conference Center on Oct. 7 at 7 p.m. and ask for some answers.

Edward Beechert,
Pacific Grove

Data inadequate

Public review of the Environmental Impact Report for the Fort Ord Reuse Plan, presented last month by the Fort Ord Reuse Authority, revealed the planners failed to provide accurate and adequate information about the availability of water, roads infrastructure and funding to support their concept.

Instead, they concentrated on massive economic development in the form of a completely new community to accommodate 50,000 new people, 25,000 new students, plus visitors, on 4,000 acres, surrounded by existing developing cities, government and social agencies, adding twice what was there before the base closing.

Challenged by the foregoing, FORA explains the overreaching plan allows for maximum development, presuming whatever water, roads, and infrastructure funding is necessary will be made available in the future. They also said there is no money remaining to produce a desirable smaller plan with a valid environmental impact report.

Considering how important it is to use the Fort Ord land properly, our cities would be justified to provide FORA with additional funds (member vote pro-rated) to produce an alternative plan. However, that should be done only after the cities learn how much money FORA has received from all sources and how that several million dollars has been spent, particularly for the contract planners and their unacceptable presentation.

Laurence W. Dickey,
Carmel

DEIR deficient

There have been many concerns raised about the impacts of the Fort Ord Reuse Plan that are not disclosed in the current Draft Environmental Impact Report (DEIR). Besides the obvious impacts, such as the drain on our resources because of the sheer size of the plan, there is a seemingly unending list of other worries. For example:

In an Aug. 31 Herald article, it was reported that there are 21 housing units in Abrams Park, located next to the landfill, that were "so beyond repair they will have to be demolished . . . those houses broke apart as they settled on the Army landfill underneath them." This landfill was designated as a Superfund site due to the discovery of toxins in the groundwater under the garbage dump.

This issue appears to be unique and serious enough to warrant some discussion before there is any further development in the area. But the current DEIR does not discuss the 21 sinking houses. Are there any other houses built over the landfill? If so, what do we know about the health and safety concerns, in addition to the structural integrity issues?

The Fort Ord Reuse Authority needs to hold the DEIR authors responsible for not providing us with an adequate document. They need to demand a revised DEIR. For a plan this big and complicated, we deserve better information before we can make any decisions about whether to proceed.

Jacqueline Spjute,
Pacific Grove

LETTER BOX

New Peninsula city

If you are concerned about the prospect of having a new city of 72,000 on the Peninsula, which would double the demand on our already overdrawn water supplies and cause gridlock on our aging roadways, here is what you should do:

Write, before Oct. 11, to: Fort Ord Reuse Authority (FORA), 100 12th St., Building 2880, Marina 93933.

Ask them to prepare a new draft environmental impact report that thoroughly analyzes all the direct and cumulative impacts of this additional growth, identifies where the new water will come from, and designates who will pay for it and for the proposed widening of local highways.

Ask them how the fantastic beauty of the Monterey Peninsula and our precious quality of life here will be maintained in spite of such growth, and ask them who will guarantee this and pay for it.

Most of all, ask them why they don't solve the entire problem by cutting back their reuse plan to something that is environmentally and fiscally sound, and acceptable to the Peninsula community!

You might also attend and speak out at the FORA public hearing at the Monterey Conference Center on Oct. 7 at 7 p.m.

There never was a worse time for the public to sit back and let others protest. Now, more than ever, the Peninsula's future depends upon all of us!

Caroline L. Nunn,
Pacific Grove

Lawsuits abound

It seems as if every week your paper carries a story about another lawsuit won by citizens opposed to hyper-development or mishandling of public resources:

First, Stanislaus County was sued, and lost, for an inadequate environmental impact report (EIR) for an enormous project which failed to examine the effect on future water needs. This project planned 5,000 houses on 29,000 acres.

Then Caltrans and the Federal Highway Administration were sued by residents because the environmental impact statement on the Hatton Canyon Freeway project failed to disclose important environmental impacts.

The planners of the New Los Padres Dam on the upper Carmel River omitted details about detrimental effects on the nearby choice vineyards, as well as native Indian sites, in the EIR (among other problems), thereby resulting in lawsuits by the vineyards and by Native Americans.

Only yesterday local citizens obtained an injunction against the water management district for allocating 150 acre-feet of water without an EIR, contrary to well-established law.

Now the people of Monterey County face a skimpy EIR for the Fort Ord Reuse Plan which ignores future water needs and traffic. A truly adequate EIR will avoid having this important project tied up in the courts for years by endless lawsuits.

Dan Krag,
Pacific Grove

How tall?

The problem with the current Fort Ord Reuse Plan and the Draft Environmental Impact Report is that it doesn't tell us how tall the building can be to meet specified density. In other words, we have no idea what this project will look like when it is built out. This is called lack of full disclosure and is a violation of the California Environment Quality Act (CEQA).

Fort Ord will continue to be every visitor's introduction to the Monterey Peninsula. It is important to protect this viewshed corridor. The developers' desire for increased profits should not and cannot dictate densities and building heights.

The only protection for all residents of this area is to have a strong plan in place, which will ensure that the entrance to the Monterey Peninsula is worthy of its natural beauty.

A plan with clear density and height limits that encourages attractive development does not preclude developer profit.

Patsy M. Hensley,
Pacific Grove

LETTER BOX

More hotel rooms

The Fort Ord Reuse Plan envisions an additional 1,800 hotel rooms at Fort Ord. This is the equivalent of eight 225-room Embassy Suites. According to the California Environmental Quality Act, the draft environmental impact report is supposed to point out "reasonably foreseeable" projects of a similar nature; it doesn't.

Well, there are another 2,900 hotel rooms on the Peninsula that are either approved, undergoing environmental review or which have been publicly discussed in newspaper reports. Add Fort Ord's 1,800 and you have 4,700 new rooms. At present there are approximately 9,300 rooms in the area.

Forty-seven hundred new rooms will increase visitor accommodations by 50 percent! Is anyone in the hospitality industry analyzing the implications of such growth? Plans that look like paper dreams today have a way of becoming frozen bureaucratic and political imperatives tomorrow.

In addition to the hospitality industry, do local citizens really realize the stress that the Fort Ord Reuse Plan for hotel rooms alone will put on our roads, our water, our beaches and indeed our neighborhoods and quality of life?

Constance D. Coleman,
Carmel

Plan unrealistic

The Fort Ord Reuse Authority (FORA) Base Reuse Plan and environmental impact report (EIR) should be focusing on water, transportation and quality of life issues and economic reality rather than unrealistic development proposals.

The proposed growth exceeds any realistic planning projections based on implementation realities and the existing infrastructure and resource supplies.

Why so much? How much is actually needed for economic recovery vs. serving the ambitious expectations of a few? I sure don't want a sales tax for new Fort Ord transportation facilities. There is not enough water to serve existing needs on the Peninsula. Why aggravate the problem?

Members of the FORA board should come to their senses before they finalize the existing EIR and adopt a plan based on unrealistic alternatives. If there is a serious need for economic recovery, don't let the planning process get tied up in the courts. Revise the plan and prepare a new EIR.

This revised plan should contain a more realistic alternative compatible with the existing water supply, transportation facilities and political, institutional and legal realities of what is possible, given existing resources.

Kris Lindstrom,
Pacific Grove

LETTER BOX

Concerns for Ord plan

The May 1996 Fort Ord Reuse Plan jeopardizes what we hold dear in the Monterey Bay area: our unique natural environment, our water, our viewshed, our quality of life, even our tourist and agricultural industries.

If this isn't enough cause for alarm, the newly released Army Final Supplemental Environmental Impact Statement (EIS) states on page ES-5: "Additional development adjacent to the inland ranges would increase potential for exposure to ordnance and explosives."

The Army document issued this warning about the December 1994 Fort Ord Reuse Plan, which had 13,000 housing units and 26 million square feet of office park and retail space. The May 1996 Reuse Plan decreased the space for office park and retail to 14 million square feet, but it increased the housing units to over 22,000 and spread them more widely over vacant land that is even closer to the unexploded ordnance fields and other toxic sites.

There is not enough water, wastewater or road capacity to service the current reuse plan. Since we need to scale back this plan anyway, wouldn't eliminating the proposed development that is nearest the potentially dangerous sites be the most prudent thing to do?

Call your mayor and supervisor and tell them your concerns. Ask our state and federal representatives, Assemblyman Bruce McPherson and Rep. Sam Farr, to take a stand on this issue before the period for public comment closes on Oct. 11.

Karen Morgan,
Pacific Grove

High-priced water

A recent Herald story (Sept. 10) stated that the Fort Ord Reuse Authority (FORA) board will be asked to negotiate with Marina Coast Water District as the sole water supplier for future development on Fort Ord.

I was surprised to read that the average charge quoted by Marina is 86 percent higher than the rate quoted by California Water Service (which serves Salinas) and 27 percent higher than Cal-Am's average quote. Prices quoted for a 748-gallon unit were: California Water Service, \$0.83; Cal-Am, \$0.91 to \$1.51; Marina, \$1.23 to \$1.86. Marina Coast's rates to current users are among the highest in the county.

According to the same story, the FORA subcommittee's choice of Marina Coast was based in part on the fact that it is a public agency. As such, it does not pay out dividends or taxes. Why, then, is it more expensive than its privately financed competitors?

Marina Coast claims the advantage of having deep wells, a capability to provide treated wastewater and desalination technology. Note that its water reclamation system and planned desalination plant each have capacities of only about 300 acre-feet per year. Does this qualify it to undertake the massive projects now envisioned by FORA, or would the larger, more experienced companies be better qualified?

Considering the high prices and small size of Marina Coast, it appears that the recommendation by the FORA subcommittee is based on local politics rather than economic facts. Come to FORA's public meeting at the Monterey Conference Center, 7 p.m. Oct. 7, and speak up for a more rational approach to Fort Ord's water issues.

Robert Greenwood,
Carmel

LETTER BOX

Hatton edict and FORA

Editor, The Herald:

I hope that the FORA board, staff and consultants will very carefully note the recent decision by the 9th U.S. Circuit Court of Appeals that the environmental impact statement (EIS) on the Hatton Canyon Freeway is inadequate. In essence, the decision says that because there was no consideration of a reasonable range of alternatives adequate to satisfy environmental law, the EIS must be redone. The EIS was flawed because the public and decision-makers were deprived of an adequate assessment of the environmental impacts of placing a freeway in Hatton Canyon.

Similarly, the Fort Ord Reuse Plan draft environmental impact report (DEIR) does not analyze a reasonable project alternative that would use existing ground water on the base ("safe-yield, on-site project"). Even this cut-down version would be a huge project — equivalent to building a city the size of Monterey.

This EIR also fails to provide the public and FORA board members with the environmental impacts of very large water systems, wastewater treatment systems and road improvements that would be required by the current, massive 72,000-person project.

At this point, decision-makers and the public are being deprived of vital information. The FORA board members must insist that their staff and consultants provide them and the public with an adequate environmental impact report.

Clayton Anderson,
Carmel

Causes of death

The Hatton Canyon environmental impact statement died on Friday the 13th in San Francisco.

Causes of death included complications of heart failure due to deprivation of adequate environmental impact assessment; and no consideration of a reasonable range of alternatives.

The patient also suffered from reliance on stale scientific evidence.

May it rest in peace.

The current Fort Ord Reuse Plan environmental impact report suffers from the same symptoms that killed the freeway environmental impact statement. The Fort Ord Reuse Authority board needs to closely monitor the health of its own patient.

Marjorie L. Timmins,
Carmel

Coast Weekly
Powder Keg 9/5/96

The Carmel Pine Cone/CV Outlook

September 12, 1996

The FORA Board is sitting on a developmental powder keg! If the Fort Ord Reuse Authority chooses to unleash this mega-project by adopting the reuse plan, we could face up to 70,000 new full and part time residents, 12 million square feet of new offices and industrial parks, 1,800 new hotel rooms, six new golf courses and 45,000 extra jobs.

The FORA plan goes way beyond the high point of the Army at the base; 70,000 people can account for a lot of increased water consumption, air pollution, and traffic congestion.

But we don't have to roll over and play dead! Other communities in America have forced government bureaucrats to back down from base-related over-development.

Become informed by looking into the reuse documents. In Pacific Grove, copies of the Fort Ord Reuse Plan are available at city hall and the library. Let your elected officials, especially Congressman Farr, state Senator Mello, Supervisor Karas, and Assemblyman McPherson know about your concerns over this monster of a development.

TERRENCE B. ZITO
COUNCILMEMBER
PACIFIC GROVE

Reduce Fort Ord reuse

Dear Editor:

In light of the recent extensions of the deadline for comments on the four-volume E.I.R. on Fort Ord Reuse, I am compelled to write this letter and encourage anyone who has a genuine concern for our natural resources and environment to take the time and get involved.

The Fort Ord Reuse Authority by now is well aware that the citizens throughout Monterey County are not supportive of the grandiose "reuse plan."

Proof of this is in FORA's recent actions to extend the deadline for comments on the plan. In so doing, they have admitted that they are well aware of the communities concern over the massive plan, which calls for 22,000 homes, 12 million square feet of commercial space, and over 71,000 people at build-out.

Supporters will explain that it is unlikely that the population will ever increase to 71,000 people. Well, we know from experience, once it is approved, then the opportunity exists.

I am calling for the Fort Ord Reuse Plan to be reduced so that the final build-out does not involve any increase in population compared to the population of the military base during the installation's highest year: 35,000.

The reasons are twofold:

First, Fort Ord today has tremendous infrastructure inadequacies. Our elected officials will be remiss if they ignore the inability for the base to support a larger population and increase development in terms of water and transportation.

Second, there is a countywide concern to protect and preserve our community so that we are not overrun with rampant development.

The Monterey Peninsula has taken special care in reviewing all aspects of growth in our surrounding community, and we should not ignore the need to preserve our quality of life. Protection of our natural environment is a critical component of our community and one that we must consider when we look at Fort Ord Reuse.

We need to scale the Fort Ord Reuse plan down significantly. We cannot just sit back and permit the plan to move forward with such long term impacts on our Peninsula and County.

Jeff Davi, *Pebble Beach*

(Editor's note: Jeff Davi is a candidate for 5th District Monterey County supervisor).

305-9

LETTER BOX

8/18/96 FORA myth dispelled

Apparently thinking that local citizens are naive and will believe almost anything, the staff of the Fort Ord Reuse Authority (FORA) continues at each presentation to threaten the public, saying that if the massive, growth-inducing reuse plan and related draft environment impact report are not supported and adopted, the Army will step in and dispose of the property which will therefore be developed without any plan.

This myth was summarily dispelled at the Aug. 7 public forum held by the FORA staff in Salinas. When asked to produce written documentation proving that such a threat was valid, the Army representative present replied that there is *no* such document. In fact, she said, under re-closure law, the Army can *only* dispose of land to private developers after a base reuse plan is in place. Otherwise, she explained, the developers would not be able to develop.

Since this process seems to be driven by regional growth and development, it is unlikely the powers that be would take this draconian step which could prevent development.

Constance S. Wright,
Carmel

9/13/96 When is the reckoning?

I keep waiting for something, anything, to be said or done regarding the mayor of a city with 96 registered voters which just received \$500,000 to help unemployment in his city.

He has gone bankrupt twice and owes the IRS for back taxes, yet this man has a seat on our water management board, Fort Ord Reuse Authority, the Mayors Select Committee and Association of Monterey Bay Area Governments.

Each of the organizations mentioned affects the citizens and taxpayers of Monterey County.

So is Mayor David Pendergrass of Sand City going to be called to account? And if so, when?

Elizabeth Leeper,
Monterey

Zito to offer FORA proposal

9/2/96
Editor, The Herald:

The people of the Monterey Peninsula need to become involved in the Fort Ord Reuse Plan process, and there's no time to waste! The plan as currently proposed would replace an Army population of 35,000 with residents and students of over 70,000, 12 million square feet of new industrial parks and offices, 1,800 new hotel rooms, up to six new golf courses and 45,000 jobs.

The potential negative impact of all of this on our environment and way of life staggers the mind! Seventy-thousand people can account for a lot of water consumption, air pollution and traffic congestion.

On Wednesday, I will propose to the Pacific Grove City Council a resolution urging the Fort Ord Reuse Authority (FORA) board to: "Produce a revised Draft Environmental Impact Report that downsizes the proposed development to approximate a replacement of the Army activity, rather than to substantially increase development."

This more modest approach is warranted by the fact that the economies of Seaside and Marina have not experienced the "great distress" that was originally predicted with the closing of the base. This, after all, was the overriding rationale for setting this process in motion in the first place. When we also consider problems of water availability, aging infrastructure, viewshed impacts, traffic and even unexploded ordnance, a scaled-down version of this development is clearly indicated.

I urge citizens to read as many of the reuse documents as possible. The city of Pacific Grove has copies of the plan available at City Hall and the library. Please make your concerns known to your elected representatives, especially Rep. Sam Farr, state Sen. Henry Mello and Assemblyman Bruce McPherson.

Terrence B. Zito,
City Councilman,
Pacific Grove

9/5/96 In dark on golf courses

It was reported in The Herald on Aug. 1 that the Department of the Army and the city of Seaside had reached agreement on the sale of the golf courses at the former Fort Ord. The report further stated that the Army, the Seaside City Council and Congress would have to approve the sale to make it official.

Since this is a local matter which is going to be considered by Congress, I contacted Rep. Sam Farr's office to find out where a copy of this agreement could be reviewed and if a period of time would be available for the public to offer comments. Also, it seems likely that any legislation regarding such a sales agreement will emanate from Farr.

Now, four weeks later, and after four separate contacts with Farr's office, not one bit of information regarding this agreement has been provided to me. I question why the office of our local congressional representative is unable or unwilling to provide a timely response to such routine questions.

Government property is involved and I believe any interested party should have a right to know the terms and conditions of such an important transaction before a vote is taken.

My suspicious nature tells me that the next report on this subject will be fait accompli: "No one had any comments so we approved it."

F.L. Early,
Monterey

Fort Ord DEIR needs revision

Editor, The Herald:

Elsewhere in California, a court ruling last week may compel the Fort Ord Reuse Authority (FORA) to revise its Draft Environmental Impact Report (DEIR).

Invoking the California Environmental Quality Act (CEQA), the Fifth District Court of Appeal ruled (Sierra Club vs. County of Stanislaus) that its EIR was inadequate. Until the EIR is revised and recertified, development of a proposed 5,000-unit resort and residential community cannot proceed.

As at Fort Ord, water was the major issue in Stanislaus County. The EIR furnished detailed plans to provide sufficient water for development during the first five years of the project. However, it failed to furnish plans to provide the water necessary for the remaining 20 years of the project.

How similar is FORA's reuse plan. The so-called Preferred Alternative in its Draft EIR finds 6,600 acre-feet/year of water sufficient for development until the year 2015. After then, however, it equivocates. Only vague hints are made about the sources of the additional 12,000 acre-feet per year of potable water needed for a metropolis housing 72,000 people.

There's little point in continuing the present environmental review. Conducting meetings and workshops, making changes to remedy minor deficiencies in the DEIR, preparing for certification of the document, may all add up to a total waste of agencies' time and taxpayers' money.

Instead, the DEIR should be extensively revised.

In the revised document, a reasonable alternative recommended by Mayor Alan D. Styles of Salinas should be carefully evaluated. It calls for the eventual full buildout of Fort Ord based on the safe-yield, on-site use of water. By restricting total yearly consumption to between 4,700 and 6,600 acre-feet, overdraft of that portion of the Salinas aquifer underlying the fort would be halted as would further seawater intrusion.

Arthur Mitteldorf,
Pebble Beach

(Mitteldorf is co-chairman, Conservation Committee, Ventana Chapter, Sierra Club.)

Flawed document

The DEIR for the Fort Ord Reuse Plan seems to have a blatant disregard for environmental rules and regulations. The DEIR allows project constraints such as water, wastewater, traffic, seismic activity, slope, soils and viewshed protection to be studied at a later time. Deferring analysis on these issues is very dangerous because the stated DEIR goal is to "... build out the Reuse Plan as quickly as the market will permit." (Appendix B, 1-4.)

Without analyzing these constraints now, the true carrying capacity of the land for urban development cannot be realistically and safely determined until the project is completed! The DEIR also states that the reuse plan will have a "simple but flexible growth management regulatory framework (that) avoids unnecessarily costly and burdensome regulation that slows development approval and results in unpredictable outcomes." (Appendix B, 1-9.)

We must demand a project that respects the regulations that protect our unique natural environment. Tell your elected officials to call for a revised DEIR now, and not try to repair this flawed document after it is adopted and the project is begun.

Ralph Buchsbaum, Ph.D.,
Pacific Grove

Who's behind DEIR?

Just who or what is behind the push for a huge new city at Fort Ord? The current DEIR would have us believe that it is the "desires and needs of some of the jurisdictions," i.e., the needs of Seaside and Marina. But the real driving force may be the experts, consultants and attorneys from outside the area who saw our base closure as an opportunity to caravan up here and offer their expensive services to create this massive plan.

These "experts" are trying to sell us a document that supposedly conforms with CEQA, but their plan has a distinct Southern California accent. It has monstrous problems with water and traffic today, and it offers no realistic solutions that can be found tomorrow. This is the typical Southern California style of growth.

We don't need this type of development in Monterey County. We need a revised DEIR that follows the true interpretation of CEQA, one that fully discloses all impacts and mitigations to the area before we begin to build anything.

Give us a document that we can live with and be proud of, not one that tries to get away with ignoring our water and traffic problems. Tell the 13 voting members of FORA that you would like a revised DEIR that uses only the water and roads we have available. Come to the public hearing at Oldemeyer Center in Seaside tomorrow at 7 p.m.

Karen Morgan,
Pacific Grove

LETTER BOX

FORA needs more time

On Aug. 9, the Fort Ord Reuse Authority board of directors denied the city of Carmel's request to extend time for public response to the draft environmental impact Statement covering the Fort Ord Reuse Plan. Carmel wanted more time for the public in general to study the voluminous, complex publication issued in late May by FORA's contract consultant after years of meetings and millions of expenses.

Carmel, supported by the city of Pacific Grove, also wanted additional time for the voting members of the FORA board to consider, in detail, what the consulting firm had presented and what perceptive citizens had promptly taken exception to.

The FORA board has only met once a month for a few hours of progress reports and does not seem prepared to make the historic decision. Regardless, the city of Seaside cast the critical "nay" vote, explaining there had been enough delay of their citizens receiving the economic and social benefits promised in the DEIR as it stands.

The plan all but ignores the real and present constraints of water and infrastructure. The public already sees that this massive doubling of what may be needed cannot be supported but the FORA board has allowed itself, by inattention, to be placed in an "all or nothing" position.

In the two months ahead, FORA members should meet weekly to consider the citizens' objections and to take control of its staff and consultants to produce an environmental impact report in support of a 20-year (2015) build-out plan, meeting the original objective given to FORA in state Senate Bill 899.

The draft environmental impact Report and Fort Ord Reuse Plan before us may be considered at variance with the law.

Laurence W. Dickey,
Carmel

Council irresponsible

As a resident and property owner in the city of Seaside for 46 years, I was shocked and dismayed when reading The Herald front-page story Aug. 3 titled "Brown gets salary boost." The new contract calls for a nearly \$9,000 increase plus a \$300 monthly stipend as acting redevelopment and economic director. That pushes his salary to nearly \$100,000. This flies in the face of good judgment, common sense or fiscal responsibility.

Except for public safety the city is shut down every Friday. Employees had to take pay cuts, department heads have had to leave positions unfilled, cut their budget 10-20 percent including supplies, maintenance and needed equipment. Deferred maintenance and unfunded liabilities account for thousands more.

The story also states: "The severance pay — about \$75,000 — would be paid to Brown even if he is fired for 'good cause.'"

In the contract, good cause is defined as "insubordination, incapability, dereliction of duty, conviction of a crime of moral turpitude" and also as addiction to alcohol or a controlled substance. Did we leave anything out?

The mayor states that Tim Brown is running the city. This only confirms what several of us have thought for a long time.

For the council to abrogate its responsibilities and turn the city over to the city manager and Southern California developers is inconceivable. This irresponsible council should be dismissed.

Don't forget to vote in November.

Bud Houser,
Seaside

Constant growth not vital

In several letters recently I've seen negative references to community "stagnation," suggesting that if an organism isn't growing, it's ipso facto shrinking, and further, that if it's shrinking it's somehow un-American. Both of these assumptions require scrutiny.

First, adult creatures, including human beings, spend the majority of their lives — their maturity — neither growing nor shrinking. It is in fact during their long central period of stability that most of their effective functioning occurs. Nor do communities require constant expansion in order to be healthy.

Second, a concern with growth at any cost is normally a characteristic of pioneer enterprises. The U.S. is no longer a country of pioneers despite what the movies tell us. It's time we updated our self-concept and stopped seeing ourselves as a beleaguered, struggling band fighting impossible odds and come to terms with the fact that we have matured and that quality, not quantity, is what counts most now. Blind, relentless growth is the motive of the cancer cell, not of organisms whose lives depend on living harmoniously together.

Third, it's been said that the U.S. is a nation of depressed people, people still suffering from the wounds that drove us here but too insecure and "optimistic" to say so. Constant movement is a known (temporary) antidote to depression, but it creates its own problems. Maybe instead of compulsively building and expanding, expanding and building, we might do better to look deeper into ourselves and deal responsibly with whatever pain and anger and fear we find there and not take it out on our environment.

Anne Bourne,
Carmel

305-12

LETTER BOX

FORA event frustrating

Editor, The Herald:

The Fort Ord Reuse Authority's (FORA) public "workshop" Aug. 7 at the Monterey County Office of Education auditorium was a frustrating experience for the handful of members of the public who had braved the intimidating logistics of the meeting in the hope of getting some real answers to their concerns about the Draft Environmental Impact Report (DEIR) for the massive development project proposed for Fort Ord.

It seems that the novel format called for alternating speakers with phoned-in questions, so by the time the panelists finished their initial presentations and their often extensive responses to comments, frequently simply repeating the very statements in the DEIR that were being questioned by the public, the meeting was abruptly cut off. After protests that some people had been waiting more than two hours to speak, the FORA panel magnanimously allowed them to make their two-minute comments after the TV cameras had been turned off.

Because the sign-up cards made it clear how many people had taken the trouble to attend this meeting, it is really unconscionable that the chairman allowed what amounted to filibustering to deprive them of the chance to be heard during the two hours scheduled for the workshop. If this is an example of FORA's respect for the public and its time and resource management, we are in even bigger trouble than many of us thought.

Be aware that this plan calls for a city of some 72,000 people and 45,500 jobs, creating impacts that are not even cursorily dealt with in this "program" EIR. The deadline of Aug. 30 allows too little time to examine these issues and urgently needs to be extended.

Mary Ann Matthews,
Carmel Valley

Extend comment deadline

FORA's unanimous voted to extend to Aug. 30 the public comment period on the Fort Ord Reuse Plan/Draft EIR was welcomed by the public. Thank you for that! Unfortunately, because of summer schedules and vacations and the complexity of the thick documents, the general public, and perhaps the FORA board itself, has not had sufficient time to study and make comment on the DEIR.

The deadline to receive public comment is almost upon us. But the public is not ready and, I gather, neither are the City Councils of Pacific Grove and Carmel, both of which voted unanimously to extend the comment period to Dec. 13.

A few weeks ago during the discussion of the first extension period, it was encouraging to those of us in the audience to hear Marina council member Jim Perrine say that he would be agreeable to a further extension should the need arise.

That need is here. The FORA board has the power and the wisdom today to vote for this extension. Why rush blindly into this project when a few more months will make all the difference between an inadequate DEIR and a well-thought-out document.

Mark Christensen,
Carmel

Ord DEIR inadequate

The city of Salinas, a member of FORA, requested in its February 1996 scoping comments that the DEIR for Fort Ord include a project alternative designed to use only on-site, safe-yield water. Nothing wrong with that. It's not only a reasonable request, it's mandated by the California Environmental Quality Act (CEQA), which calls for projects to have a reasonable range of alternatives. CEQA further requires that an alternative be designed which would reduce the significant impacts of the project.

The DEIR fails to provide this basic function of CEQA and therefore is inadequate. A revised draft EIR must be prepared as per the project alternative requested by the city of Salinas. And this project alternative must be fully defined and analyzed as directed by state Senate Bill 899, the overriding state legislation for the development of Fort Ord.

Robert E. Kohn,
Carmel

Let's see the numbers

If FORA is going to use "economic recovery" as an excuse to implement their proposed huge plan, the public deserves to see some hard numbers. After all, full disclosure is a basic component of CEQA.

The FORA consultants should ask each member (eight cities plus the county) to provide economic information for the fiscal year preceding the closure of Fort Ord and for the most recent fiscal year in order to prove/disprove the stated need for "economic recovery."

This data, with verifiable sources for the information, should include: city/county general budget; sales tax; number of employed/unemployed; school enrollment. For perspective, the city of Watsonville (a city of 30,000 people) should be used as the control group.

The above information should be made available at the September FORA meeting and should be included in a revised draft EIR. Without this information any attempt to use "economy recovery" as an overriding consideration could seriously subject the document to a challenge.

Shirley Humann,
Carmel

Fort Ord DEIR impact great

8/8/96

Editor, The Herald:

There has never before been a document which would have a greater impact on the Monterey Peninsula than the draft environmental impact report (DEIR) on the reuse of Fort Ord. Over and over I hear people saying, "I had no idea this plan was so massive!"

Because it is so long, complicated and expensive to purchase, many at this point are virtually unaware of its enormity.

The document does not offer adequate mitigations or environmental analysis for the immense impacts of this plan. It in effect says, "Don't worry about it; trust us. We'll work the details out later." All of the hard decisions have been avoided, presumably because everyone, including the Fort Ord Reuse Authority staff, knows they are controversial. For instance:

- Where will the 18,000 acre-feet (as much as the whole Peninsula now uses) of additional water come from?
- Can this Peninsula absorb a 57 percent increase in population?
- Can this Peninsula absorb the influx of 1,800 more hotel rooms full of tourists who might not worry about water conservation?
- Has the plan factored in the new hotel rooms and development already planned?
- Do we need five more golf courses?
- How will the wastewater treatment capacity be expanded? Where?
- Do we want our local highways widened to four and six lanes? How would this extensive work be funded?
- Why does this plan develop twice as much land as the Army used?
- How can the Highway 1 corridor keep from being visually impacted without design guidelines?
- Why is there no height limit on new buildings?

Ignorance isn't bliss

8/8/96

In an attempt to unravel the complexities of the Fort Ord Reuse Plan/Environmental Impact Report I am torn between two conflicting philosophies. On the one hand, I could take the easy way out and subscribe to the theory that "ignorance is bliss" or I could buy into the corollary that "knowledge is depressing."

Which would I rather be? Blissfully ignorant and accepting, or depressingly knowledgeable about the reuse plan for the buildout of Fort Ord? I'd choose knowledge over ignorance any day, wouldn't you?

Citizens of the Monterey Peninsula must become involved and informed about the largest land-use issue in all of Northern California. For this purpose, work/study sessions on the Fort Ord Reuse Plan/EIR are being planned for the Peninsula and in your cities. Contact the FORA office at 883-FORA and your city halls for the dates and times of these meetings. Your newspapers will also carry announcements of these meetings.

Don't be ignorant! Be knowledgeable!

Peggy Jorgensen,
Carmel

Once the numbers are built into an adopted plan, it will be far harder, if not impossible, to modify them.

Please send your comments to FORA, 100 12th St., Bldg. 2880, Marina 93933 and support the city of Carmel's request that the deadline for comments be extended from Aug. 30 to Dec. 13.

Linda C. Anderson,
Carmel

305-14

A vote of no confidence

8/8/96

I would like to express my public vote of *no confidence* in David Pendergrass as a public servant. He may be an elected official by Sand City, but he has no right to represent me on the Monterey Peninsula Water Management District, Association of Monterey Bay Area Governments, or Fort Ord Reuse Authority.

It may sound harsh to have little compassion for another's plight or hard times, but this is the second time Pendergrass has filed for bankruptcy protection, according to The Herald, July 20. I feel that he should be held personally responsible and fully accountable for his bills. Before credit cards, we had to save money for things we wanted to buy. I have read that many people get in over their heads with credit-card debt. Well, our public representatives should be setting an example of responsible fiscal behavior.

Pendergrass has been a proponent of grand development for Sand City with little thought to the conservation of our natural resources. Perhaps the root of this problem is based in his inability to conserve his own financial resources.

As a taxpayer, I don't want to pay back taxes for Pendergrass. And as a consumer, I don't want to pay for his items of consumption. Yet, I have no choice. I suggest that he get a paying job and pay off his bills like I must do.

Barbara Baldock,
Monterey

LETTER BOX

Draft EIR for Ord flawed

The draft Environmental Impact Report (DEIR) for the Fort Ord Reuse Plan contains numerous flaws. One is so serious that a revised draft EIR is legally required in order to comply with the California Environmental Quality Act (CEQA). The DEIR fails to provide a project alternative designed to reduce the significant impacts of increased water, traffic and wastewater.

In February, the city of Salinas, a Fort Ord Reuse Authority member, requested a project alternative constrained by safe use of on-site water resources. Even though the request was reasonable and CEQA requires the selection and discussion of alternatives that foster informed decision making, curiously this sensible alternative is not included.

Certification of the EIR and the adoption of the current "preferred project" trigger land transfers to the cities and county. The land can then be sold to the private parties. This creates the developer's "constitutional right to develop the land to its highest and best use." It becomes a "land trap" destined to become the 72,000-person city.

This DEIR doesn't adequately describe the enormous environmental consequences of building huge new water systems and new four- and six-lane roadways. It doesn't even provide an on-site location for a wastewater treatment plant. Neither does it tell us who pays for all this.

The solution is to prepare a project alternative that allows land to be used and sold so that the on-site, safe-yield water is not exceeded by the long-term reuse of the base. This would lessen other adverse impacts as well.

Local and county water agencies have been urged to request a revised draft EIR that would be recirculated for review. Other agencies and concerned individuals are asked to do the same. Your voice will be heard. Write to FORA, 100 12th St., Bldg. 2880, Marina 93933, by Aug. 30.

Debra J. Mickelson,
Carmel

Letters to Editor

REUSE PLAN GOES TOO FAR

Dear Editor: Aug 96 Monterey County Post

I am very concerned about the recommendations set forth in the Fort Ord Reuse Authority's "Final Base Reuse Plan."

As an active member of the community, I became involved with the Fort Ord Closure after its announcement in the early 1990's. As a member of the Mayor's Economic Development Task Force for the City of Marina, I participated in and attended many meetings and workshops on the Fort Ord closure and its reuse.

These meetings and workshops were put on by the Fort Ord Reuse Group (FORG). FORG was the entity created in the early 90s that ultimately gave birth to the findings of the newly released "Final Base Reuse Plan" for the Fort Ord Reuse Authority. Joseph Cavanaugh was hired by FORG to help create the Base Reuse Plan. Several years of work consisting of many meetings, workshops and public input resulted in initial drafts of a reuse plan.

I recall these drafts being released and immediately being revised because the public reaction was that the plan described too much development. The reuse plan was updated several times, each time being pared down in an effort to gain public acceptance. After the creation of the Fort Ord Reuse Authority (FORA) by state legislation, the work of FORG was then handed over to FORA. This "Final Base Reuse Plan" is the culmination of those years of work since the announcement of the base closure.

Unfortunately the "Final Base Reuse Plan" still goes too far. I am still reviewing the four volumes which include an Environmental Impact Report, Business Plan, and the Base Reuse Plan, Volume 1 and 2. This document is huge and its impact to the Central Coast is enormous. The loss of Fort Ord basically took away a large component of Monterey County's economy. The effects have been felt in all of the surrounding communities.

The goal for Fort Ord reuse should be to replace the economic impact lost by the exodus of the military, not to invite unbridled growth and development for the sake of profit with no concern for the environment and preservation of our quality of life. I believe FORA is going too far with their plan which could potentially realize over 70,000 people on the base as compared to the former population of 30,000.

FORA should focus on a reasonable, less aggressive plan which will ultimately replace what was lost in the way of the economic impact and population at Fort Ord. FORA must acknowledge the natural constraints of resources such as water and the infrastructure and public demand that will control all future development at Fort Ord.

I encourage the citizens of Monterey County to take an active role in the "Final Base Reuse Plan." The only way to do that is to contact the Fort Ord Reuse Authority and obtain an Executive Summary of the plan (or purchase the entire 4 volumes for \$120.00) and prepare written comments which you can present to the Fort Ord Reuse Authority directly. This may be the only opportunity for the public to comment on this Reuse Plan and be able to change its contents. The Fort Ord Reuse Authority is a governing body set up by State Legislature (SB 899) and the individuals serving on this board are indirectly held accountable to the voters only through the respective Cities or County they represent.

The residents of Monterey County, and more specifically, the Monterey Peninsula have to take an active role and comment on the Reuse Plan to their elected officials that serve on FORA, as well as FORA itself. The impacts of this proposal will be realized over the next three decades, and the impacts will be permanent on this peninsula.

Please get involved by sending comments and concerns so that we can preserve our quality of life and ensure that "San Jose" like developments do not take place at Fort Ord.

Jeff Davi, Monterey

bureaucrats

leave public out

Editor, The Herald: 7/1/96

Good grief! A four-volume Environmental Impact Report (EIR) addressing the development proposed for the Fort Ord property. A horrendous network of freeway/expressway/interchanges that will dump a lot more traffic into our communities. And we have only until July 15 to examine this EIR.

These plans have already been given the blessing of Caltrans, TAMC, AMBAG, our Board of Supervisors, Del Rey Oaks City Council, etc. But the ordinary citizen has been left out in the cold.

The bureaucrats tell us otherwise, that the agencies' meetings where these things were discussed were open to the public. But these meetings were certainly not widely publicized to alert and really invite public input.

There is only one copy of the EIR in each of 10 locations in the county. This means one copy for every 30,000 people. The first time I checked the one in Monterey's library it hadn't even been cataloged. On my second visit I discovered (and I'll wager my neighbors even now don't know) that little York Road at Laguna Seca is destined to become part of a new expressway which will pick up a new freeway from Salinas and then extend north to service hotels, golf courses, retail shops, etc. And yet we have only three weeks to examine this EIR and give our comments to the Fort Ord Reuse Authority; that is if it is not already too late!

I don't think the people want any more freeways dumping traffic into Del Rey Oaks or downtown Monterey. Further, I think the people want real jobs for their children, not hotel and retail jobs. Fort Ord has the earmarks of becoming an Orange County or another San Jose, a metropolitan complex in our midst.

And where is the conscience of these politicians and bureaucrats when they sacrifice our attractive community to urban sprawl? And to make this action even more unseemly it was done without the awareness of the public who are essentially outside the "bureaucratic loop."

There is a meeting of the FORA group scheduled for July 1 at 7 p.m. at the Oldemeyer Center in Seaside which invites public comment.

Gudrun Beck,
Monterey

Fruitful meeting 7/16/96

If you didn't attend the Fort Ord Reuse Authority meeting at the Oldemeyer Center, you missed the event of the year on the Monterey Peninsula. There were over 100 concerned citizens present and about 20 of them addressed the panel with thoughtfully researched, accurate presentations on water issues, traffic congestion and major development before we create another San Jose by the bay.

We need more time to study *the plan*. We need more community involvement. What would happen if we invested as much time and interest in growth design and management as we do in jazz festivals and golf tournaments? There has been a precedent set by Seaside for 12-story skyscrapers by the seashore and this area is not a tropical paradise like Acapulco or Waikiki.

One of the speakers expressed her reasons for moving to our pristine area from her overdeveloped hometown in Marin County. She was promptly blasted by Sam Karas who came up off his elbows to shout at her, "You are part of the problem!" He then went on to denigrate the efforts of all the other speakers.

Later, I overheard a panel member wailing, "Carmel residents are butting in again, telling us how to run things." Stewardship of the coastline is everyone's responsibility and public input on decisions is necessary. Marina's mayor announced that he had learned a lot in this two-hour session. The deadline for plan study has been extended to Aug. 30. You may obtain an executive summary of the Environmental Impact Statement at your local library. Call your mayor, your supervisor, or members of your city council with any questions you may have. Get involved.

Karen Zelmer,
Seaside

LETTER BOX

Weighty task burdens FORA

Editor, The Herald: 7/19/96

The Fort Ord Reuse Authority board has a tremendous responsibility in formulating a workable plan for the disposition of Fort Ord property. There is a great deal of pressure on them by adjoining cities who want to grab their "share" of the property so they can build hotels, golf courses and housing developments, but the FORA board members know the limitations of our resources and must not forget that they are stewards of this land.

It is incumbent upon them to make decisions that reflect the desires of the residents who will be impacted. Once the area is built out, there can be no going back!

Last fall the voters rejected the New Los Padres Dam, not because of the proposed rise in taxes, but because they feared the inevitable unbridled development that would occur if there were a sufficient source of water.

If the extensive plan which FORA is considering for Fort Ord is approved, life on the Peninsula will be changed forever. These officials must have the wisdom and the resolve to act rationally in representing the will of the residents of the Peninsula and to choose wisely a reuse plan that will not irretrievably spoil our beautiful area.

Jack and Trixie T. Brown,
Monterey

Letters to the Editor

Letters should not exceed 350 words and are subject to editing. Letters must be typed and include name, address, telephone number and signature. Those that have previously appeared in other publications will be given last priority.

The hard questions 7/18/96
Dear Editor: Pine Cone

The Pine Cone's July 11 editorial, "Now's the time to demand further limits on Fort Ord redevelopment," was responsible, timely and well written.

In my opinion, one of the most important functions of a local newspaper is to play a leadership role in encouraging elected officials and the public to make responsible decisions.

Your excellent editorial asked the hard questions — "Where will the water come from? Can our road system handle many more motorists?" — and aptly pointed out that the greatest danger in having such a bloated "road map" for the future development of this Peninsula is that "If you put it in the plan, it will happen."

I am sure that the great majority of Carmel residents would join me in thanking you for having the vision to understand the immense problems with this proposed plan.

As you suggested, all of us should send written comments (100 12th St., Building 2880, Marina, CA 93933; or 883-3675 by fax) to the Fort Ord Reuse Authority before Aug. 30.

Linda Anderson, Carmel

6/18/96
Reuse report scary

I'm not easily frightened, but your special report on the reuse of Fort Ord, though appreciated, threw a bad scare into me.

Let me see if I've got the numbers roughly right:

A new city, six times as large as Carmel. More than twice the current population of Monterey. Twenty-nine Del Monte shopping centers. Eight Embassy Suites. A new freeway from Salinas to Monterey.

Seven new golf courses?

And the water is to come from the already overpumped Salinas Valley aquifer?

Who is the task force that took six years to come up with this blueprint for an urban nightmare?

Why do the rest of us have to become the victims of their grim vision, their singular lack of pride?

What were their ideals - San Jose, Santa Clara County?

What's wrong with Monterey County now that an additional 71,000 people would fix?

Whenever the goal of open-space preservation comes into contact with privately owned land, the argument quickly becomes: Buy it or get out of the way.

Well, here is land that doesn't have to be bought: It already is publicly owned.

How about just leaving it alone?

Walter Kinzel,
Monterey

A scary plan 6/25/96

In The Herald (June 16) the Fort Ord Reuse Authority (FORA) plan revealed some staggering prospects for the Monterey Peninsula: a new community of 71,000 people, 1800 new hotel rooms, more than 13,000 new homes to be built, 12 million square feet of new industrial parks and office complexes (enough to fill an area 20 times the size of Del Monte Shopping Center in Monterey) and nearly 4,000 acres of land available for private owners (an area six times the size of Carmel).

Where is the water coming from to make all this possible? We are told it will come from wells, but these wells are already depleting the aquifer and are causing salt water intrusion. The FORA plan also presupposes the erection of a desalination plant, but this has not yet been approved by the electorate.

This is a scary plan.

Lyn Bronson
Carmel,

Don't do favors 6/27/96

It seems incongruous to me that: 1) we are about the spend more than \$100,000 on a study to find out why Monterey County rejects any proposal for a new dam, and 2) we don't already know the answer as to which constituents are for a dam and which are not.

All taxpayers automatically reject requests for more taxes or expenditures they conceive not (to be) in their best interests. Long-term commitments that offer a change, not improvements, are rejected summarily.

Take Monterey County and the prospect of one new, one enlarged, dam. More water - right? For whom? Us? Don't be silly! As soon as more water comes, more houses come, more golf courses come, more roads, etc. We can see from here in Monterey to Salinas to Big Sur, to Castroville full of new houses, needing more water. New roads allow families to move to the country - they do not improve traffic. They create it!

Of course building contractors, the Chambers of Commerce, the Realtors, all utility companies, want to improve their base and income. Theirs is a short-term quick gain - to be followed by another request for an even larger dam!

No one is really mad at visionaries, businessmen, county tax collectors. We just don't want to progress to be a San Jose, or, God forbid, a Los Angeles. There are millions of barren acres of land between here and Los Angeles that are on the sea shore and all they need is water, water, water and venture capital - not increased taxes for local inhabitants. We are happy with a quaint, small, self-contained area - that is currently the envy of the world. As the New Yorkers say "Don't do me no favors!"

Thomas H. Muller,
Monterey

LETTER BOX

FORA plan goes too far

Editor, The Herald: 6/30/96

The FORA "Final Base Reuse Plan" goes too far. I am still reviewing the four volumes which include an environmental impact report, business plan and the Base Reuse Plan Volumes 1 and 2. This document is huge and its impact on the Central Coast is enormous.

The loss of Fort Ord basically removed one of the largest components of Monterey County's economy. The effects have been felt throughout the surrounding communities. The goal of Fort Ord reuse should be to replace the economic impact lost by the departure of the military, not to invite unbridled growth and development with no concern for the environment and the preservation of our quality of life.

I believe FORA is going too far with their plan, which could potentially realize over 70,000 people on the base, as compared to the former population of approximately 30,000. FORA should focus on a reasonable, less aggressive plan which will ultimately replace what was lost in the way of economic impact and population at Fort Ord.

FORA must acknowledge the constraint of resources such as water and infrastructure and the public's demand that will control all future development at Fort Ord.

I encourage the citizens of Monterey County to take an active role in the "Final Base Reuse Plan" by sending comments and concerns to FORA directly so that we can be sure to preserve our quality of life and ensure that "San Jose-like" development does not take place at Fort Ord.

Jeff Davi,
Monterey

Editorials

Pine Cone 6/27/96

Demand more review for Fort Ord reuse documents

THE FOUR volumes together combine to make a tome several inches thick — the draft Fort Ord Reuse Plan and environmental impact report, the blueprint for the former Army base as it evolves over the next half century.

Let's face it, even some of those who played a part in developing the plan haven't read every page of it. But there is one thing we must demand: A comprehensive reading should be at least humanly possible.

By releasing the plan for public review last week and expecting written comments to be submitted by Monday, July 15, the good people at the Fort Ord Reuse Authority have done themselves and the process a great disservice.

Perhaps more distressing is the FORA staff's decision to hold just one public hearing — from 7 to 9 p.m. Monday in Seaside.

The draft plan and EIR exhaustively detail a development, redevelopment and land preservation proposal that concerns an area that is nearly as large as San Francisco. Why should the review amount to less than that received by your typical condominium or golf course project?

The particulars of the plan will affect the precious character and quality of life for every resident on the Peninsula and in the county. Much of the plan's contents are controversial, and the discussion of even a narrow subject like water could be the subject of a multiple public hearings.

Contact any of the Peninsula mayors or any council person who serves on FORA, and insist on an extension of the public comment period.

Make Your Voice Heard

The Draft Environmental Impact Report (DEIR) for the Fort Ord Reuse Authority (FORA) plan has just been released. Unless an extension is granted, written comments are due on July 15.

The DEIR describes a city of 72,000 that would need a water supply three times the level currently available. We have an opportunity to comment on this coming Monday July 1st, at 7-9pm at the Oldemeyer Community Center at 986 Hilby Ave., in Seaside.

The Environmental Impact Study (EIS) and DEIR is over one foot thick. We need to ask for an extension until Tuesday September 3 to complete an in-depth study of this DEIR. Come lend your support for this extension request.

We will be calling for a series of public workshops to review this Draft Environmental Impact Report. The DEIR uses a concept, known as a Program EIR. By using the Program EIR method, important issues like water and other resource planning are postponed indefinitely. As an example: The DEIR concludes the need for 18,000 acre feet "is not a significant impact" because it states that 66 percent of the water supply will come from "importation of water and /or desalinization." The DEIR does not say where the water will be imported from. The fact that a significant portion of the reuse area falls under the jurisdiction of the Monterey Peninsula Water Management District is ignored to the extent that this boundary is not even depicted on any map.

The workshops will be an opportunity for the Fort Ord Reuse Authority (FORA) board and ex officio members, staff and the public to discuss in a question and answer format, critical issues like water, traffic and project goals.

Please come voice the reasonable request for a comment period extension.

BEN POST
CHAIR VENTANA CHAPTER OF THE SIERRA CLUB



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

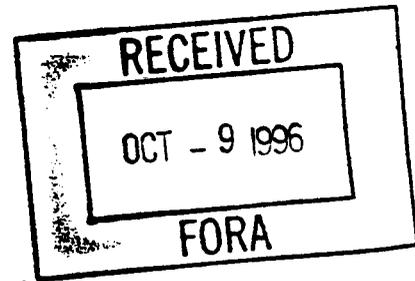
Hollister Resource Area

20 Hamilton Court

Hollister, California 95023-2535

2000
CA-019.5

Les White, Executive Director
Attention: Ann Hebenstreit
Fort Ord Reuse Authority
100 12th Street, Building 2880
Marina, CA 93933



Dear Mr. White:

Thank you for the opportunity to review the Draft Fort Ord Reuse Plan and Environmental Impact Report. The Bureau of Land Management would like to commend the Fort Ord Reuse Authority for your visionary efforts to establish a network of conservation and recreation lands that mutually support community needs for both habitat protection and recreation opportunities. We would also like to commend you for your efforts to integrate the BLM Fort Ord Public Lands with the existing communities and future community development at Fort Ord. Both of these concepts mirror our goals for the BLM Fort Ord Public Lands which include working in partnership with the communities of the Monterey region to provide for both habitat and recreation needs.

We would like to take this opportunity to express our concerns about continued efforts to expand development proposals to encompass lands that have been designated for habitat protection. These efforts include proposed highway corridors, water storage reservoirs, cemeteries, expansion of the MOUT law enforcement training compound, and construction of a law enforcement driver training course. The proliferation of proposed development activities within habitat reserves serves to erode public and agency confidence in FORA's commitment to both the Habitat Management Plan and the Draft FORA Reuse Plan.

Lands being transferred to the Bureau of Land Management are designated primarily for habitat management protection. Our agency's agreement to be responsible for these lands is a key component of the basewide habitat management strategy, and represents a substantial long-term federal commitment of resources in support of the local

306-1

communities. These lands are being transferred to the BLM with a restriction that allows modification or development of no more than 2% of the land. This 2% limitation includes lands needed for any support facilities the BLM may require for long-term management of these lands. 1

In the future, the BLM would appreciate FORA taking a stronger role in protecting the habitat reserves. While there are opportunities for placement of public facilities within the BLM habitat reserve as part of the 2% development window, the variety of current proposals by FORA or FORA members would quickly exceed this 2% threshold. This would eliminate any flexibility to meet future community or agency needs for additional support facilities. We would like to emphasize that the appropriate place for siting development proposals is within those areas designated for development.

While we recognize that providing for these additional public needs within areas set aside for development could reduce population build-out projections, we doubt this would have any impact on regional economic recovery.

We have the following additional specific comments on the Draft Fort Ord Reuse Plan Environmental Impact Report: 2

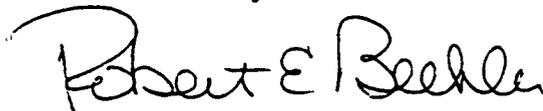
Page 4-30 - The discussion on long term loss of soil fertility caused by fire suppression is inconsistent with current scientific data which suggests that hot fires are more conducive to natural regeneration of chaparral communities. This issue was discussed at a Fort Ord CRMP meeting with natural resource and biological representations all concurring that hot fires were more desirable.

Page 4-32; Program A-2.2 - We suggest you modify this program to include non-invasive non-native species as well as native species for erosion control. Limiting erosion control revegetation to native species could severely compromise the effectiveness of erosion control efforts. In some cases non-native species may be more desirable since they can provide initial stabilization of the site creating an opportunity for more competitive native species to eventually reestablish themselves. 3

Page 4-64 - Impact: Long-term Exposure to Unexploded Ordnance - The Inland Range Impact Area is expected to remain under U. S. Army control until the unexploded ordnance clean-up procedures have been completed. The only area where the public will be permanently excluded is the "High Density Unexploded Ordnance" area indicated on Figure 4.6-4. Ordnance clean-up within this high density area is expected to be deferred until the development of better ordnance clean-up technology. 4

Thank you again for the opportunity to comment on the FORA Reuse Plan and EIR. The BLM remains committed to fostering a strong inter-agency collaborative framework to help implement the Habitat Management Plan and the FORA Reuse Plan. We look forward to continued close collaboration with FORA and its members, particularly as partners on the Fort Ord Coordinated Resource Management & Planning (CRMP) Team. If you have need any additional clarification on our comments, or wish to discuss any of the issues addressed, please call me at the BLM's Hollister Resource Area (408-637-8183).

Sincerely,

A handwritten signature in black ink that reads "Robert E. Beehler". The signature is written in a cursive style with a large, prominent initial "R".

Robert E. Beehler
Area Manager

cc: Veronica Ferguson, Monterey County
Catherine McCalvin, USF&WS



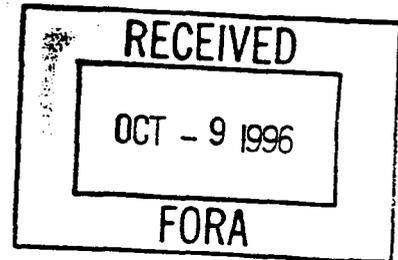
PACIFIC GROVE RESIDENTS ASSOCIATION

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Bud Nunn
Barbara Sexton
Barbee Swofford
Randy White

October 4, 1996

Les White, Executive Director
Attn: Ann Hebenstreit
Fort Ord Reuse Authority
100 12th St., Bldg. 2880
Marina, CA 93933



Dear Mr. White

Thank you for providing the Pacific Grove Residents Association the opportunity to comment on the Draft Fort Ord Reuse Plan and the Draft Environmental Impact Report for this plan.

We believe that events evolving at the former fort are bound to seriously and permanently affect the quality of life throughout the Monterey Peninsula and beyond and, as you will note from the footer below, both the Plan and the DEIR are vitally important to our membership.

Sincerely,

Bud Nunn, President



"Dedicated to preserving and enhancing Pacific Grove's unique quality of life for all residents, to supporting local businesses, and to enriching and protecting the special environment in which we live."

P.O. Box 52146, Pacific Grove, CA 93950

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PACIFIC GROVE RESIDENTS ASSOCIATION

Comments on the Accuracy and Adequacy
of the
**DRAFT FORT ORD REUSE PLAN
ENVIRONMENTAL IMPACT REPORT (DEIR)**
dated May, 1996

Submitted to Fort Ord Reuse Authority (FORA): October 2, 1996

INTRODUCTION AND SUMMARY

This report is the result of studies and discussions carried out by a duly appointed subcommittee of the Pacific Grove Residents Association (PGRA). Its submission to FORA, on behalf of the members of the association, has been authorized by the PGRA Board of Directors.

In addition to this section, beginning at page three, the report consists of a narrative that summarizes the most serious concerns that have developed due to our review. This narrative is followed by a section which consists of specific questions aimed at assisting the DEIR consultants in responding to our concerns.

The concerns of the PGRA have mainly to do with:

- (1) the charter of FORA and the extent to which the Fort Ord Reuse Plan ("Plan"), and its environmental review are responsive to it;
- (2) the extent to which regional concerns have been part of the planning and environmental review processes;
- (3) the extent to which adequate regional governance has been provided for and will be enforced as the reuse of Fort Ord evolves;
- (4) the apparent continued absence of final resolution and financing of disposal of unexploded ordnance necessary to assure the safety of present and future residents of the area;
- (5) the lack of well-defined baseline conditions needed to carry out credible planning and analysis efforts;
- (6) the poor quality and scope of project alternatives, and the resulting lack of full disclosure of all foreseeable environmental impacts, direct and cumulative, local and regional;

(7) the overwhelming, unrealistic, and unfunded demands upon Peninsula water supplies that are already severely limited:

(8) the similarly unacceptable demands that would add enormous burdens to the already overloaded Peninsula road and highway systems and lock up traffic for residents and visitors alike;

(9) the superficial analysis in the Plan and DEIR of obvious problems related to wastewater treatment and disposal of effluents;

(10) the absence of any concern for adverse impacts upon the viewsheds that emanate from the southwesterly shores of the Monterey Bay National Marine Sanctuary and, in particular, the shores of Pacific Grove; and

(11) the definition of realistic, acceptable, and enforceable funding schemes for all proposed projects as well as for full mitigation of all of their unacceptable environmental impacts.

We find that in many regards the proposed Fort Ord Reuse Plan would have multiple and significant unmitigated adverse environmental impacts and that the proposed alternatives to this plan offer inadequate relief to these problems. Because these unmitigated adverse environmental impacts are not accurately and adequately described in the DEIR the PGRA believes that the document, in its present form, cannot and should not be certified as an adequate planning tool in conformance with the California Environmental Quality Act

For reasons detailed herein, the PGRA asks the FORA board to direct that the subject DEIR be redrafted to include several essential improvements not the least of which is the inclusion of a realistic alternative that is strictly constrained to be achievable with existing infrastructure resources, financeable without undue additional public taxes, and buildable without adverse environmental impacts.

NARRATIVE

2

BASIS AND SCOPE OF THE REPORT

The Role of FORA and the Extent of the Plan

FORA's mission as set forth in SB899 clearly requires the minimizing of disruption caused to the people of the Monterey Bay area by base closure, and the maintenance, protection, and enhancement of the quality of life of the Monterey Bay community. In addition, the bill sunsets FORA when 80% of the development and reuse called for has been achieved or June 30, 2014, whichever comes earlier.

We find that the proposed plan would aggravate, not "minimize," the disruption caused by base closure. In many instances, the Plan would create new environmental problems that are far more disruptive than the closure of Fort Ord has been. The proposed plan flies in the face of both the letter and the intent of SB899, and it is severe overkill of the so-called "economic recovery" target.

The mandated purpose of the reuse plan is not to promote development but rather to identify and provide for credible measures to restore an economic climate in the area that is commensurate with that which existed prior to the downsizing of Fort Ord. In no way can one read into the establishing law of FORA a mandate to provide for population, housing, and infrastructure that goes far beyond anything that was ever permitted or even envisioned for Fort Ord.

The Plan is excessive in speed as well as extent. We find no legislation giving FORA the role of "allowing local communities and the private sector to build out the Reuse Plan as quickly as the market will permit." (DEIR I-4). Nor do we find any authority for planning 50 years into the future.

The notion of "recovery" is abused. The DEIR project objective of ..."developing an economic/employment recovery to compensate for base closure" leads the reader to believe that there is substantive information in the DEIR or other accompanying documents to prove that there is, in fact, something from which to "recover." We find no such information, and the PGRA is concerned that the supposed "need to recover" is meant as justification for the 72,000 person city [Vol 1 pg 3-44]. It is no large extrapolation to predict that this will be legally challenged by the public.

Process

3

At many points in the SB899 statement of FORA's mission, reference is made to the need to serve ..."the people of the Monterey Bay area." The focus of

the FORA board, its Reuse Plan, and its DEIR fails to reflect the breadth mandated by this phrase. The PGRA takes no issue with the fact that the communities of Marina and Seaside are the most immediately affected by the base closure. However, we believe that it is the welfare of the entire Monterey Bay community at large that is at stake in seeking to formulate an acceptable Fort Ord reuse plan.

In reviewing the Plan, the PGRA has found no specific reference to the concerns of the residents of Pacific Grove. In addition, we find no assurances that the needs of Pacific Grove businesses, particularly those of our visitor-serving establishments, have in any way been of concern to those who have defined the preferred alternative.

None of the many maps found in the DEIR extend to areas south of SR68, or north of Marina city limits. We find this to be a serious omission, since virtually all of the significant impacts of the proposed Plan are regional in nature and of serious concern not just to Pacific Grove but to all points south, east, and north and even west. The Board and its consultants should refrain from thinking of the phrase "sphere of influence" as synonymous with "sphere of impact."

Failure to fully analyze the environmental direct and cumulative impacts of the Plan upon all jurisdictions in the region, invites serious objection from the citizens of those jurisdictions, including challenges in court. In addition, such failure violates the full-disclosure mandates of CEQA and leaves FORA board-members incapable of rendering informed decisions.

Buy now pay later. An especially aggravating feature of the DEIR is the way in which virtually all significant adverse impacts are summarily dismissed by reference to documents unavailable to the common citizen, and/or by simply stating that ... "Agency A shall review each future development project for responsiveness to concern X and require that 'suitable' measures are incorporated into the development plan as a condition of project approval." We find no assurances that adequate means will be in place, short- or long-term, to enforce such vaguely worded provisions in the face of the demands of developers claiming vested interests?

Scoping of the EIR not in accordance with CEQA. In a letter dated August 26, 1996 and signed by Salinas Public Works Director John K. Fair, an official request was made of FORA that the EIR include ... "a scenario which identifies the level of development possible from the on-site wells without aggravating the rate of seawater intrusion" A similar request was made of the Army in a letter signed by Salinas Mayor Alan Styles and dated February 6, 1996. Even though officially requested by an authorized FORA member agency, the DEIR contains no such alternative and, as we understand the rules of CEQA, this fatally flaws the DEIR.

Recent appellate court ruling applies. The PGRA wishes to cite the recent ruling of the California 5th District Court of Appeal that strikes down an EIR certification of Stanislaus County because of inadequate examination of the effects of future water needs. The ruling is directly applicable to the subject DEIR and Plan, and will serve as a legal precedent should the project be allowed to proceed as presently described.

9

Public health, safety, and welfare. We are informed that the cleanup of unexploded ordnance on the former Fort Ord land is not completed, nor is there an officially approved plan in place. In addition, it has been announced by Army officials that changes in earlier plans may be construed by the Army as justification for its relief from financial liability for such cleanup.

10

We feel that this issue has been consciously omitted from consideration within the DEIR and that to do so endangers the safety of humans who are and will be occupying the land. Before the project goes further, a full description of the problem is needed, as well as its solution, appropriate time schedules, and a clear delineation of who is and will be financially responsible for any costs associated with finding and disposing of unexploded ordnance.

Governance and Mitigation

11

At many points in the DEIR, apparently in attempting to provide some comfort to the public regarding identified significant adverse environment impacts, we find statements such as this: "FORA, jointly with local city managers, county officials,[etc.] shall develop a regional program, facility,[etc.] to promote efficiencies in operations, levels of service [etc.] and secure the appropriate funding mechanism, required service, [etc.]

Such vague and pointless wording is generally found under the heading of "Mitigation Measures," and its inclusion in the DEIR gratuitous and somewhat insulting to the public intelligence. An environmental document that bases its credibility on such wording is indeed on shaky ground, and those who cherish the quality of life on the Peninsula are deservedly frightened by it.

The PGRA is aware of numerous occasions when such "agencies," "efficiencies," " funding mechanisms," etc. have been needed in connection with regional environmental problems (e.g., water management, roadway improvements, storm water runoff control, solid waste management, ...), and have yet to be found. To now go ahead with a plan that will drastically effect all aspects of Peninsula life for the foreseeable future on the basis of such flimsy assurances -- and in the absence of any substantial guarantees of their implementation -- is folly of the worst kind.

12



Virtually all of our serious environmental problems are regional, and the extent and quality of the handling of them by local jurisdictions varies widely on the Peninsula. Until a strong regional governance structure is designed and put into place, with authority and backing to control projects such as those proposed by FORA, there is likely to be a pervasive skepticism among concerned citizens.

13

As it is, the EIR does not adequately address the enforcement of limiting constraints to the proposed growth prior to the year 2014. Beyond that time, FORA may not even exist!. In fact, any FORA plan will need strict enforcement, with due attention to regional needs, far into the future -- perhaps indefinitely, and certainly well beyond the mandated disestablishment of the FORA.

14

In addition to the use of vague promises, the DEIR cites programs and policies in the DEIS as means of reducing and/or mitigating adverse environmental effects. If this is the intent, then these measures must be designated as actual mitigation measures and fully described as to when and how they will be implemented. In addition, agencies responsible for mitigation implementation, as well as funding needs and resources available to meet them, must be clearly identified. Once developed in the revised DEIR, these measures should be incorporated into a monitoring plan for adoption by FORA. An implementation plan that clearly and unequivocally states that mitigation measures must be in place BEFORE development proceeds is a must.

11

Baselines for Planning and Analysis

15

The first and most elementary consideration of planning is to establish a baseline from which changes can be measured. The PGRA review finds no adequate definition of baseline economic and environmental conditions against which future modeled or projected conditions can be compared.

Given a clear and honest evaluation of the present economic climate -- the baseline -- the mandated purpose of the reuse plan is, then, to identify and provide for credible measures to restore the economic climate in the area that existed prior to the downsizing of Fort Ord. Given such a baseline, and the present departures from it, such corrective measures must then be evaluated and, to do so, requires the definition of quantitative and measurable goals that are achievable within existing infrastructure constraints while maintaining the high standards of environmental protection characteristic of the Monterey Peninsula.

Projections that evolve from an poorly defined or non-existent baseline are worthless. We think the present baseline, as we can barely perceive it, needs work. Further, even with an adequate baseline, until the above planning and analysis has been completed by FORA staff, any proposals for more growth than that certainly cannot be intelligently evaluated.



The PGRA believes that for the vast majority of the region's residents, the Monterey Peninsula is already at or beyond its capacity to sustain existing major growth. While most of these citizens are ready to assist in treating the economic weaknesses caused by Fort Ord downsizing, it is too much to expect them to accept growth that goes far beyond this. Yet, this is exactly what the Plan and its DEIR is asking.

Misleading characterization. Frequently in the DEIR and related documents, reference is made to the proposed developments in terms of the 28,800 acres of Fort Ord land as if it was all actually available for development. The resulting large percentage of land not slated for development is called "Habitat Management." We ask that if such descriptions are retained in the final draft that consultants also provide data (percentages, pie charts) showing the proposed developments in terms of what is currently developable for human activities, and not inclusive of projects already in place or land that is unsafe for full public access and use.

Provision of adequate alternatives -- full disclosure

The PGRA wishes to be included among the many who will register a plea for a well-developed alternative that would take the former Fort Ord area back to the economic health it enjoyed before base closure AND NO FURTHER. The absence of any such alternative -- and it must receive full treatment, not just lip service -- will send a clear message to the public that the FORA power structure has no interest in preserving the Peninsula as we know it.

Of course, once such an alternative is included for consideration, and FULL DISCLOSURE is given to its merits relative to those of other alternatives, there is a likelihood that this will be the alternative preferred by a vast majority of the public. As it stands now, the preferred alternative has not been included in the DEIR.

INFRASTRUCTURE

Water

It is estimated that ultimate buildout of the proposed project would result in a water demand of approximately 18,262 afy (this figure allows for a 10% loss due to leaks) which represents a significant increase in recent past demand which ranged from 4,700 to 5,100 afy. Future demand also exceeds the current permitted water allowance for former Fort Ord of 6,600 afy from the Salinas River Basin and 400 afy from the Seaside Valley Basin. In light of the existing, region-wide water supply shortage, this increased demand is acknowledged by many to be the primary constraining factor for the project sizing as proposed. The PGRA seconds the motion.

It is well known that water problems, including shortages and salt water intrusion, abound on the Monterey Peninsula. Nevertheless, the DEIR and the Plan pay virtually no attention to the impacts that massive new water consumption on the Fort Ord property might have on neighboring jurisdictions. On local as well as regional bases, environmental effects are not identified in sufficient detail to allow informed decisions by the governing bodies.

In addition, political impacts have apparently been ignored in development of the Plan. For instance, no mention is made of issues related to the membership of the city of Seaside in the Monterey Peninsula Water Management District (MPWMD). As a past and continuing consumer of MPWMD water, the city of Seaside would become the benefactor of a "waterfall" approximately equivalent to the needs of two Pacific Groves.

To enable intelligent decision making by FORA directors, the revised DEIR must develop and present project alternatives that are constrained to rely on no more than existing water supplies (sustainable yields of groundwater from existing wells) and associated infrastructure that is now present at the site -- the "water baseline." These alternatives should be described in enough detail to evaluate the extent to which they support the project objective of "economic recovery." Scenarios proposed as "alternatives" in the DEIR that are not achievable with existing water and without aggravating the present rate of subterranean salt water intrusion in the area should be identified as such and their environmental impacts, including cumulative impacts, should be clearly and forthrightly stated.

Although passing mention of alternate water sources is found in the DEIR, analysis of their impacts and necessary funding burdens is superficial. The DEIR states that "a number of reasonable, new water supply sources have been identified to support the proposed project, including the siting of an on-site desalination plant". These sources should be defined in more detail if indeed they are "reasonable."

Recent experience on the Peninsula teaches that water projects that are viewed as accommodating unwanted growth will not be voluntarily supported by local taxpayers. To ignore the controversy associated with new water sources, and their adverse environmental impacts, is to take a path that will surely end in frustration.

Water management matters associated with any Fort Ord Reuse Plan will be especially needful of effective and reliable governmental control systems prior to and beyond the year 2014. The DEIR gives the public no hope for such systems. The public and the FORA board members must be given more information on how such supplies will be provided. The lack of detailed discussion of feasible alternatives, and their environmental impacts, is a fatal flaw in the DEIR. Given

the level of information that is available (e.g., MPWMD feasibility studies on desalination) the lack of full disclosure in this DEIR violates CEQA mandates.

Traffic and Transportation

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The PGRA concerns having to do with traffic and transportation are similar in general to those regarding water. We feel that the authors of the DEIR have not appreciated the fact that Pacific Grove residents and visitors travel the impacted traffic corridors at least as much as, if not more than, those who live in or visit Seaside, Marina, or other more proximate jurisdictions.

What was once an enjoyable and relaxing drive along the lanes leading to and from Pacific Grove, through Monterey and Seaside, and past Fort Ord and Marina, can even now become a life-threatening ordeal. This is without any further impacts generated by the proposed reuse plan. Surely, the funneling of tens of thousands of new residents and visitors, in their cars, to and from the Fort Ord site, will cause significant and far-reaching adverse impacts throughout the region -- in air quality as well as traffic.

The DEIR does not adequately analyze such concerns. Where they are acknowledged in the document they are accompanied by so-called mitigation statements that border on the ridiculous (see above).

In the DEIR, we find no accounting for the fact that prior regional traffic impacts due to Fort Ord were relatively minor compared to those to be expected from an equal number of non-military occupants. This is because of the "captive" status of troops there and, when needed, the use of Army mass transit vehicles. To simply add back the prior population of Fort Ord, and no more, will aggravate Peninsula traffic beyond baseline conditions.

The DEIR should contain detailed traffic studies of all the impacts on all nearby jurisdictions -- the seven Peninsula cities, plus Castroville, Moss Landing, Salinas, and unincorporated areas.

Hardships and taxes without representation. The DEIR reveals that the adverse environmental impacts due to increased demand on regional transportation systems -- off-base only -- are significant and unavoidable on both project levels and as cumulative impacts. This reads to us as a statement that nearby jurisdictions are being asked to accept as unavoidable the significant impacts that are caused elsewhere, and pay the many costs that they entail. Yet, the power structure of FORA does not even give these jurisdictions a level playing field with on-site jurisdictions.

26

In short, the Peninsula already has serious roadway capacity deficiencies and the Plan will make them far worse. These aggravations will occur beyond any

capability to finance remedial measures. To make matters even more egregious, the DEIR consultants appear to promote the unacceptable notion that those already having to live with a fouled-up system should not complain when others propose to make it worse.

The PGRA believes that traffic alone is a more than adequate reason for constraining new growth at Fort Ord to pre-closure levels or less.

Wastewater and Solid Waste

27

Residents of Pacific Grove are quite cognizant of the importance of adequate facilities for transport and treatment of human waste products. The adequacy of our local system is of constant concern and more than one political career has been caught up in flow of backed-up sewage into bay waters adjoining the city. The PGRA finds again that should the Plan fail to provide adequately for necessary infrastructure, the cumulative impacts of poor wastewater and solid waste management are bound to affect the entire Peninsula area.

In spite of the critical nature of these facilities, the DEIR simply lists their impact as a "Need for New and Upgraded Utility Systems and Services," along with water distribution and stormwater infrastructure systems, as well as telephone, cable, gas and electric services. All of these are addressed in only two pages of DEIR, and the "mitigation" is little more than a statement that the "City/County shall comply with assembly bill 939" and that the Plan includes capital improvement projects recommended for construction between 1996 and 2015.

The PGRA is not anywhere near satisfied with this, and neither should the FORA board accept it.

VISUAL RESOURCES

28

In Section 4.11, the DEIR considers, all be it perfunctorily, the following impacts: Reduced Visual Quality On-site, Reduced Visual Quality Seen from State Route 1, Reduced Visual Quality from State Route 68, and Reduced Visual Quality Seen from Salinas Valley. Mention of the visual quality from across the bay is nowhere to be found.

The PGRA believes that Pacific Grove's most valuable environmental asset, for residents and visitors alike, is her unobstructed public shoreline ALONG WITH THE SEAWARD VIEWS THAT IT AFFORDS. Those who have enjoyed these views come from around the world, and they are very familiar with the visual intrusions of the Monterey Bay Hotel and, most recently, the Embassy Suites Hotel in Seaside. ↓

We believe that no structure should be considered for the Plan without due attention to its impacts on the views from Pacific Grove. If adequate mitigation measures cannot be found and enforced, such projects should be modified, moved, or prohibited. For the DEIR to completely ignore project impacts on these views is negligent, at best. In fact, it is more evidence of an overall attitude of the drafters of Plan that Pacific Grove -- her residents, her visitors, and her businesses -- are of no particular concern.

QUESTIONS

The Role of FORA and the Extent of the Plan

1. What is the legal authority giving FORA the responsibility to plan Fort Ord reuse beyond the year 2015? Why not stop at 2015? 29
2. If FORA feels capable of adequate planning 50 years into the future, why stop there? Why not go out to the year 2050, say, or even 2100? 30
3. What is the legal authority permitting FORA to propose a buildout of the Fort Ord property that far exceeds the level of use there prior to base closure? 31
4. Do the DEIR consultants maintain that the Plan minimizes disruption of the Monterey Bay area, as mandated in SB899? 32
5. What is meant by allowing communities and the private sector to build out Fort Ord "as quickly as the market will permit?" What is the meaning of such as speed criterion? Who measures it? What is its legal basis? 33
6. To what extent is the need for speed able to override the SB899 mandate to minimize disruption and protect the Peninsula environment? 34
7. What is the baseline from which FORA is measuring "economic recovery?" Please give a comprehensive and quantitative answer, and identify the point in time that is being used. 35
8. Do the project consultants maintain that economic recovery is in itself an "overriding consideration" available to local governments as justification for the vast and significant negative impacts of this project? 36

Process

9. To what extent is FORA mandated to consider the concerns of on-site jurisdictions as opposed to those of neighboring and nearby communities? 37
10. Why is there not graphical representation in the DEIR showing the region likely to be impacted by events at Fort Ord? 38
11. In the power structure of the FORA board of directors, why is there more than one level of voting influence? Why are they not the same? 39
12. If different voting levels on the FORA are appropriate, why are there only two? Why, for instance, do Salinas and Carmel have the same voting power? 40
13. Why doesn't the DEIR consider all the impacts of the Plan, direct and cumulative, on all jurisdictions within the areas likely to be affected by it? 41
14. What assurances are there that adequate means will be in place, short- or long-term, to enforce such vaguely worded provisions given as mitigations in the DEIR? To what extent will these assurances deter developers' claims of vested interests? 42
15. Why is there no alternative in the DEIR that identifies the level of development possible from the on-site wells without aggravating the rate of seawater intrusion? 43
16. What analysis has been made of the recent ruling of the 5th District Court of Appeals, and how will this ruling serve as a precedent for evaluating the legality of the DEIR? Please site relevant references. 44
17. Who is going to pay for rendering the area safe from unexploded ordinance, and when will this be completed? In the event that harm comes to persons or property due to unexploded ordinance, who will be liable for payment of penalties and damages? Please site relevant authoritative references. 45

Governance and Mitigations

18. What governmental body will be in place to respond to concerns of individuals or groups in the region regarding developments at Fort Ord? If this is to be FORA, what will be in place beyond the year 2015? 46
19. To what extent will non-local entities be able to intervene in events at Fort Ord? For example, if a concerned citizen of Pacific Grove wishes to question the legality of a building going up long Highway 1, how will he or she keep informed and, if necessary, express opposition? 47

20. Related to the above, what authority will be the immediate superior to FORA in terms of rights of appeal?

48

21. Is it anywhere stated that mitigation measures must be in place before development is allowed to proceed? Please comment.

49

22. Given the membership of Seaside in the MPWMD, might Pacific Grove, or other member jurisdictions, be entitled to some amount of Seaside's portion of the water assumed to be "available" at Fort Ord?

50

23. Who will pay for water demand created by new construction at Fort Ord? Are there any conceivable scenarios that would make neighboring jurisdictions financially liable for such projects?

51

24. Who will pay for roadway improvements needed as a result of new construction at Fort Ord? Are there any conceivable scenarios that would make neighboring jurisdictions financially liable for such projects?

52

25. Assessment of roadway impacts are tenuous at best, and not even available beyond the year 2015. Why then does the FORA claim to be able to plan beyond that time, let alone evaluate environmental impacts?

53

26. Mitigation for the need for public services such as waste water disposal is a statement that the "City/County shall comply with assembly bill 939." In the event that such compliance is not forthcoming (as it is not at the present time) who will be liable for cleaning up the messes, paying fines, and financing corrective measures? (This question might be asked about most if not all the mitigations listed in the DEIR.)

54

27. The DEIR uses the designation "Potentially Significant" for many adverse environmental impacts. What is the meaning of this in terms of CEQA requirements (is "potential mitigation" required?), and what criteria are used to define "potential."

55

28. The effects of the need for a new local water supply is termed "potentially significant." How does the consultant argue the potential nature of such impacts. Is it not obvious that such a project will be at least highly controversial and likely to require a full EIR?.

56

Baselines for Planning and Analysis

57

29. What portion of the Fort Ord property is presently undeveloped and fully accessible for human use?

30. In terms of the area presently undeveloped and fully accessible for human use, what are the percentages proposed for reuse (Habitat Management, Open Space/Recreation, Educational and Public Facilities, Business Parks, etc., Retail, Visitor-Serving, Agri-business.)?

58

31. What acreage is currently developable for human activities, exclusive of property not already removed from Army ownership or land that is unsafe for full public access?

59

32. What are the extents of proposed developments in terms of the acreage given in response to the previous question? Please provide graphical and tabular data comparable to that shown in the DEIR relative to the entire 28,800 acres.

60

Provision of adequate alternatives -- full disclosure

61

33. Why is there no alternative in the DEIR that would take the former Fort Ord area back to the economic health it enjoyed before base closure AND NO FURTHER?

Water

62

34. Where in the DEIR is the detailed analysis of impacts that massive new water consumption on the Fort Ord property will have on nearby jurisdictions? If there is none, why not?

35. What are the ramifications of allotting more than 3,000 afy of water to the city of Seaside, a member jurisdiction of the MPWMD? What does the SWRCB have to say about this?

63

36. To what extent are water supplies of the various Peninsula jurisdictions interdependent? For instance, what effect will new water-consuming demands in Marina have upon the water available to Seaside for new growth, and vice-versa?

64

37. Will new water made available to the city of Seaside give cause for hope in other MPWMD cities where new construction is banned pending availability of water? If not, why not?

65

38. Who will pay for the massive new water facilities and related infrastructure improvements?

66

39. Developer fees are often cited in the DEIR as potential funding sources. In light of the continuing challenge to this method of financing mitigation of new-growth impacts, what is the likelihood that such fees will be available? In 2045?

67

40. With reference to the need for new water systems, if developer fees are inadequate or unavailable, what alternative sources of funding are there, and to what extent could taxpayers in nearby jurisdictions become burdened by these shortfalls?

68

Traffic and Transportation

69

41. Why is no analysis given of the impacts on nearby jurisdictions of the adverse traffic impacts that are bound to follow from the proposed Plan? What are they? Where are they?

42. Who will bear the costs (not just in money) of the worsened traffic situations on Highway 1 throughout the Peninsula, on Holman Highway in Pacific Grove and at the HWY 1 intersection, at the mouth of the Carmel Valley, and at innumerable other locations?

70

43. At the HWY 1 intersection with HWY68 in Monterey, who are the most likely drivers to be killed or injured when the situation becomes worse? That is, are they most likely to be residents or visitors relating to Marina and Seaside, or to other departure points and destinations?

71

Wastewater and Solid Waste

72

44. Can it be guaranteed that entities reusing Fort Ord will comply with AB939? If not, to what extent is it possible that the environments and economies of neighboring jurisdictions might be impacted by non-compliance?

45. Can it be guaranteed that entities reusing Fort Ord will comply with relevant water quality regulations? If not, to what extent is it possible that the environments and economies of neighboring jurisdictions might be impacted by non-compliance?

73

Visual Resources

74

46. Why does the DEIR only consider visual qualities on site and from State Route 1, State Route 68, and Salinas Valley?

47. What are the potential impacts on the viewsheds emanating from points within sight of the coastal areas of the proposed project?

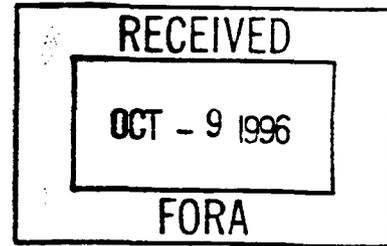
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48. What constraints on structure height will be placed upon cognizant jurisdictions so that the view of Fort Ord from Pacific Grove is not further degraded?

76

26500 Val Verde Drive
Carmel, CA 93923
Oct. 3, 1996

Congressman Sam Farr
380 Alvarado St.
Monterey, CA 93940



Dear Sam:

Everyone I know is expressing concerns about the FORA project. It's too big, it's just not the kind of economic conversion we had all hoped for. The Draft EIR is so gravely flawed that it needs to be completely redone, not just scaled down.

This project, with its 22,000 housing units and up to 72,000 people as well as office spaces, hotel rooms, industrial parks, retail outlets, and fergoshsakes, five new golf courses, is just totally out of hand.

And the DEIR omits much of the vitally necessary data. How high will the buildings be? What about unexploded ordnance? Where is all that water going to come from? What about wastewater? And with our Peninsula already experiencing serious traffic problems, what will this area be like with all that additional traffic?

These questions just aren't adequately addressed in the DEIR. Let's junk it, and start over. You have done so much to help in the conversion of a big military base to civilian use, Sam -- but it's got to be done properly, or it will be a disaster for the community.

Therefore, please take a really strong stand, and demand that we have a revised DEIR that answers the many questions the community is raising. We need a full disclosure of the environmental impacts we can expect, and we need to know exactly where the water will come from.

Thanks for all your great work, and warm personal regards.

Sincerely

(Bobbie Harms)

cc: Bruce McPherson
Fort Ord Reuse Authority

rec'd Oct 9, 96

5460 B Lincoln Way
Felton CA 95018

Dear FORA:

Hi! Thankyou for listening.
I'm sure your original
plan for Fort Ord was
much more high minded
than the current pro-
posal. Don't let money ruin
your original high ideals.
Let's go back where you
started from and stay



within those environmental and moralistically sane limits. Lets preserve Monterey from growing too quickly as we all know it would if we dont revise the existing plan again.

PHOTO BY [unreadable]
WE all know how easy it is to get carried away PHOTO BY [unreadable] to so many developers. We love you and trust your original judgment. Penelope

PREPARED BY	
DATE	

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1204 Shafter
Pacific Grove, CA 93950
(408)372-7650
October 8, 1996

Fort Ord Reuse Authority
100 12th Street, Bldg. 2880
Marina, CA 93933

Dear Members:

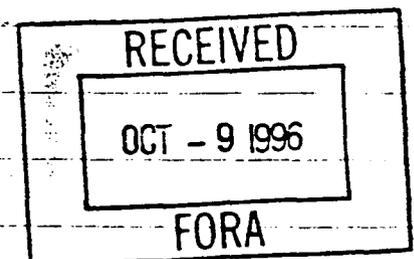
I think the basic plan you have is a good one, especially including a balance of economic development, educational facilities and environmental protection. The large tracts of land set aside for habitat protection and management are excellent.

My concern is the projected population estimates, which range from 51,000 people to 70,000, while a full military operation held around 31,000 people. This means the population will double over what was once there, added to an already expanding Marina area and Salinas Valley population growth.

I live in Pacific Grove, which has only about 15,000, but we are impacted by development which occurs in the greater area—especially traffic congestion, as we are at the very end of the Monterey Peninsula. Despite the population projections of AMBAG, I believe this area has already reached its maximum carrying capacity without degrading the quality of life. Therefore I urge that planning for Fort Ord be designed with a maximum population in mind not exceeding that which was present during full military use—about 31,000.

Sincerely,

Bruce Cowan
Bruce Cowan



TO: FORA BOARD, LES WHITE, EXECUTIVE DIRECTOR

FROM: WARREN NEIDENBERG (MONTEREY PENINSULA RESIDENT)

SUBJECT: COMMENT ON DRAFT EIR

I HAVE GREAT CONCERN ABOUT THE FUTURE IMPACT OF PAST CHEMICAL ACTIVITIES AT FORD ORD. HAVE ALL SANITARY FILLS, BIOLOGICAL WARFARE AND CHEMICAL SITES BEEN IDENTIFIED BY THE GOVERNMENT? HAVE ALL THE SITES BEEN IDENTIFIED TO THE PUBLIC? IF SO, WHAT IS THE PLAN FOR CLEANUP OF EACH SITE, THE TIMETABLE AND WHO PAYS?

Warren Neidenberg
10/9/96

625 - 3174

fax same

Joy B. Osborne

1092 Indian Village Road, Pebble Beach, CA 93953

October 7, 1996

FORA
100 12th St. Buildings 2880
Marina, CA 93933

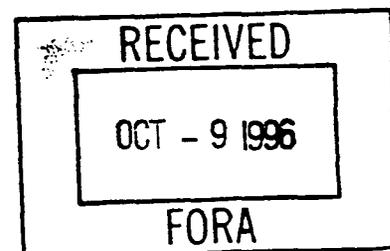
Concerning the Reuse Plan

opposed to the planning of such a huge community.
There was not enough water when the army was there-- salt water intrusion. And now there is this proposal for a huge build-out. Until there is proof of adequate water for even the 30000 that were there before, until it can be determined that a city of 30000 is equivalent to what the former army base was in water consumption, no such land use plans for even 30000 should be made. Until then there is no point in considering other problems of roads and air pollution.

The EIR is insufficient.

Joy B. Osborne

Joy Osborne



FAX to: (408) 883-3675, Fort Ord Reuse Authority, 100 12th street,
Bldg. 2880, Marina 93933

FROM: Joyce Stevens, P.O. Box 2116, Carmel-by-the-Sea, California 93921

Re Fort Ord Reuse Plan: As a former staff architect at Fort Ord for 23 years (1962 to 1985), I strongly oppose the Fort Ord Reuse Plan. It is patently unrealistic for many reasons. The primary problem is lack of water. The safe yield at Fort Ord is approximately 25% of the 18,000 acre-feet that the FORA plan requires. There has been a salt water intrusion problem at Fort Ord for at least 25 years - and surely FORA must have heard of Monterey Peninsula's water shortage. |

All the plans produced by the Fort Ord Task Force, Fort Ord Reuse Group and Fort Ord Reuse Authority since announcement of Fort Ord's closure in the early 1990s have ignored reality and have been a gross waste of public funds. Could you please tell me how much public money has been spent on these plans since 1991? 2

Other major problems (traffic, air pollution, population explosion, deterioration of natural and visual resources, etc.) have never been adequately addressed. Start over - and get it right this time. Quite simply: development should not exceed safe water yield. 3

2020 Via Taormina
Monterey, CA 93940

October 7, 1996

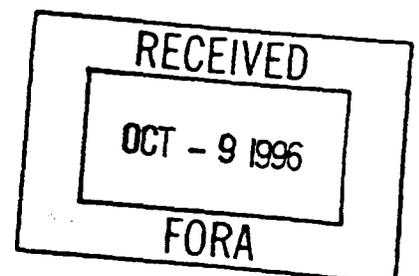
Fort Ord Reuse Authority
100 12th St., Building 2880
Marina, CA 93933

Dear Ladies and Gentlemen,

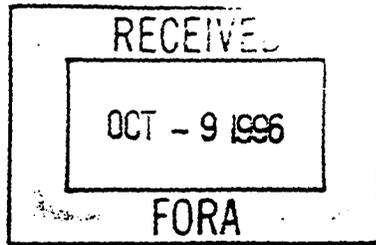
We are absolutely appalled at the proposals for the development of Fort Ord. We respectfully demand that you prepare a new environmental impact report that analyzes exactly what the effects of this massive growth will be. In our wildest nightmares, we cannot imagine 71,000 more people on this peninsula. The current proposals are environmentally and fiscally unacceptable in every way. Water...traffic...air quality...the importance of our scenic beauty to current residents as well as millions of tourists...the questions of who will pay for the proposed "improvements"...all of these issues need to be reconsidered, because what you are suggesting now is truly horrible. Do YOU want to live in the community that your proposal would create? We certainly don't.

Yours truly,

John and Nancy Durein
John and Nancy Durein



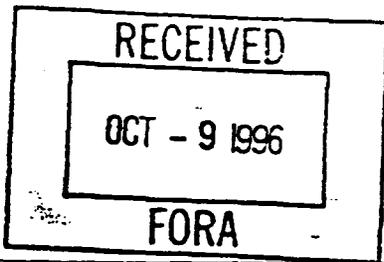
Mr. & Mrs. B. D. Winton
25719 Carmel Knolls Dr.
Carmel, CA 93923



Fort And Reuse Authority
100 12th St. Building 2880
Marina CA 93933

© USPS 1991

We are asking JORA to draft
a new environmental impact
report. The issues of water supplies,
traffic patterns & new roadways
must be addressed for any new
impact of growth on the Monterey
Peninsula. The reuse plan as
stated is not environmentally or
financially acceptable! Pat + Joan Winton



OCT 5 1996

Dear FORA Folks,

I am writing you BECAUSE I am very concerned about the amount of buildings planned for Fort Ord. A 72,000 person city is TOO big! The growth rate built into this project is FIVE TIMES our historic rate.

I believe that the FORA DEIR is a fatally flawed document. I would like to see a completely revised DEIR - not one that merely scales back the current document.

PLEASE formulate a realistic plan that uses on-site, safe yield water and gives us full disclosure of environmental impacts.

Thank you for your attention to my letter. I realize

RECEIVED

All of you are working hard on the complex issues involved in this project. But PLEASE remember two of your main objectives are:

- ① to enhance our environment and quality of life --
- ② to maintain and protect our environmental resources.

Sincerely,

Peony Williams
- 46 Miramonte Rd.
Carmel Valley, Ca.
93924

P.S. Another important subject has come to my attention - the FROG POND in Del Rey Oaks. I would like to see it expanded instead of having an office complex built there.

The children (and adults) that visit this wonderful outdoor classroom benefit tremendously from learning from nature directly. Check it out yourselves!!!
Thank you :)

2

OCT 16 1996

postmarked Oct 7
deir. upl
Oct. 8, 1996

Dear Representative Farr,

I am writing to express my concerns about the current Fort Ord Reuse Authority DEIR. The total impact of the project described in the Monterey Bay area is immense yet the data provided by the consultants in the DEIR is meager.

I would like to see a revised DEIR that would formulate a realistic plan using on-site, safe yield water and that would give us full disclosure of environmental impacts.

Susan Leibowitz

5 MG
10-18
DH

Sincerely,
Susan Leibowitz
1257 Shell Ave.
Pacific Grove CA
93950

City of Marina

211 HILLCREST AVENUE
MARINA, CA 93933
TELEPHONE (408) 384-3715
FAX (408) 384-0425



October 10, 1996

Ms. Ann Hebenstreit
Fort Ord Reuse Authority
100 12th Street, Building 2880
Marina, CA 93933

Dear Ms. Hebenstreit:

SUBJECT: ADDITIONAL COMMENTS ON DRAFT FORT ORD REUSE PLAN AND
DRAFT ENVIRONMENTAL IMPACT REPORT

On August 22, 1996, Mayor Jim Vocelka sent to Chairman Barlich the City Of Marina's general comments on the Draft Fort Ord Reuse Plan (Plan) and the Draft Environmental Impact Report (DEIR) prepared for the Plan. In that letter, the Mayor stated that "City Staff may follow this letter with a supplemental letter on more detailed aspects of the Plan and DEIR within the comment period". On October 4, 1996, I hand delivered to your office just such a supplemental letter of more detailed comments on some aspects of the Plan and/or DEIR. I have one additional set of related comments I would like to submit at this time prior to the close of the comment period. This set of comments relates to Program B-12 as now found on page 4-130 of the Plan and on page 4-150 of the DEIR.

The policy as now written is, at the very least, vague in its intent and application. There is no "Town Center" District as referenced in the draft program, but instead there is a "Town Center Planning Area" which includes a "Del Monte Mixed Use District". Is the policy meant to apply to only the Del Monte Mixed Use District, to the entire Town Center Planning Area, or to something in between? The program would be most feasible if it in fact only applies to the Del Monte Mixed Use District within the Town Center Planning Area. The Del Monte Mixed Use District is topographically mostly below the level of Highway One and therefore screening development within it by landscaping to avoid "visual intrusion into the Highway 1 Scenic Corridor" is a reasonably feasible objective. However, most of the Mixed Use Corporate Center district within the Town Center Planning Area lies topographically above Highway 1 and similar visual screening by landscaping will not be feasible.

A related concern which Marina has is that the program could be misinterpreted as a mandate that no development within whatever area it actually applies to could be visible at all from Highway 1.

1 because some people will interpret any and all such development to be a "visual intrusion into the Highway 1 Scenic Corridor". Such total visual screening is clearly impossible, particularly if someone attempts to apply the program to the Mixed Use Corporate Center. Such a prohibition on visibility of development from Highway would be inconsistent with many other aspects of the Plan, such as the designated 15 units per acre residential density for 40 acres of the Mixed Use Corporate Center.

Given the above, Marina requests that Program B-1.2 be either deleted entirely since it is excessively vague and its concerns are covered by other polices, or that it be rewritten as follows:

The City of Marina shall incorporate landscape buffers and/or other mechanisms adequate to mitigate potential visual impacts on the State Highway 1 Scenic Corridor from development within the Del Monte Mixed Use District.

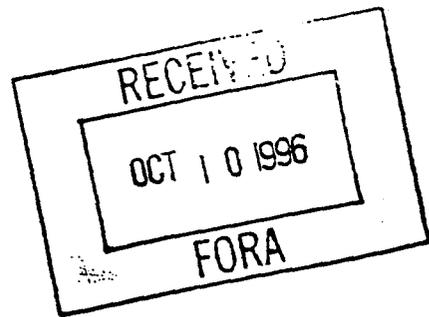
The City looks forward to working with the FORA Board, Staff and consultants during their consideration of and response to the concerns expressed in this letter in the hopes that FORA will arrive at a final Plan and EIR which can receive the full support of the City. Please feel free to contact me if you have any questions about these comments.

Sincerely,



JEFFREY P. DACK, AICP
DIRECTOR OF PLANNING

cc: Mayor and City Council
City Manager



October 9, 1996

Fort Ord Reuse Authority
100 12th Street, Bldg. 2880
Marina, CA 93933

Subject: Fort Ord Reuse
Draft EIR Not Adequate

Dear FORA:

As a concerned Marina resident I felt compelled to write and express my concern that the draft environmental impact report is not adequate. The main reason it is not adequate is it is trying to mitigate a reuse that is too large for the Peninsula. Scale back the size of the new use to make it equivalent to the size of the former Fort Ord use and many of the environmental impacts will be mitigated easily, such as, water, traffic and air pollution.

Thank you for your hard work and consideration of all comments.

Good luck, we'll all be hoping for the best.

Sincerely,

A handwritten signature in cursive script that reads "Eva Goodman".

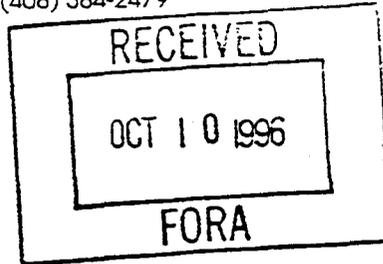
Eva Goodman

3248 Sandpiper Way
Marina, CA 93933



MARINA COAST WATER DISTRICT

11 RESERVATION ROAD
MARINA, CALIFORNIA 93933-2099
TEL (408) 384-6131
FAX (408) 384-2479



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LLOYD W. LOWREY, JR.
Attorney

October 10, 1996

Fort Ord Reuse Authority
100 12th Street, Bldg 2880
Marina, California 93933

SUBJ: Comments on Draft Environmental Impact Report for
Fort Ord Reuse Plan.

The Marina Coast Water District submits the following comments on
the DEIR for Fort Ord Reuse Plan:

Para. 1.3 **Intended uses of the DEIR.** MCWD is a local agency that
may be expected to utilize the DEIR in project approvals.

Table 2.4-2. **Issue 10.** In this table and throughout the DEIR, there
is no mention of the need for a desalination project to be
coordinated with Monterey Bay National Marine Sanctuary goals and
policies. 2

Table 2.5-1. **Effect 4.4.1** There should be mention of compliance by 3
all effected jurisdictions with the agreement to annex Fort Ord to
Monterey County Water Resources Agency Assessment Zones 2 and 2A.
The availability of 6600 afy can be assumed only if the successors
to the US Army comply with the annexation agreement. The recent
"Annexation Agreement and Groundwater Mitigation Framework" between
the City of Marina, MCWD and MCWRA and certain private parties
should also be mentioned as it makes available to Fort Ord lands
1400 afy of potable water from the 900 foot aquifer. This section
should also mention the need for compliance with County
requirements for desalination projects, and State requirements for
the use of recycled water.

Table 2.5-1. **Effect 4.4.2** Although it is mentioned in other places 4
in the DEIR, there should also be a mention here of the need for
policies and programs for the use of recycled and desalinated
water. Specific mention should be made of the need for a program to
protect the deep aquifer of the Salinas River Groundwater Basin.

Para. 3.6, **Figure 3.6.1** The Marina Coast Water District should be 5

mentioned and its boundaries and sphere of influence shown on Figure 3.6.1. 5

Para. 3.7 There should be mention of the agencies which will be involved in permitting and operating desalination facilities. 6

Para. 4.4.1 Land Use. etc. The text of the last paragraph on page 4-4 before City of Seaside should read "...on the east side and Marina State Beach and Marina Coast Water District headquarters and plant are on the west side." 7

Figure 4.1.2 The MCWD properties (headquarters, wells and tank sites) should be shown. 8

Para. 4.4.1 Public Services, Utilities and Water Supply. Environmental Setting. (page 4-38) Wastewater. It may be possible through an agreement with MCWD to obtain recycled wastewater for use on former Fort Ord lands. MCWD has rights to such water through agreements with Monterey Regional Water Pollution Control Agency and MCWRA. 9

(page 4-39) Water Supply The Annexation Agreement and Groundwater Mitigation Framework entered into between MCWD, MCWRA, the City of Marina and others on March 26, 1996, establishes a mitigation framework for the use of recycled water from the tertiary treatment facility now being constructed at the MRWPCA's regional wastewater treatment plant. Over two hundred acres of land have been reserved by the Armstrong family for an MCWD reservoir site that will store winter flows from Regional's tertiary plant in satisfaction of the District's right to reuse whatever volume of flow is contributed from the MCWD service area. The Framework Agreement also allows the use of up to 1400 afy of potable water from MCWD's deep wells on Fort Ord lands. Improving the existing connection between the MCWD water system and the Fort Ord water system would offer the possibility for use of water from MCWD's desalination plant, or a future expansion thereof, on Fort Ord lands. 10

(page 4-39) Regulatory Issues The regulatory issues for desalinated water should be added to this discussion. 11

Table 4.2.1 Water supply requirements are missing from this table. From the key, which contains a definition of "afy" it appears that water supply was intended to be included. MCWD recommends that water supply requirements be disaggregated into potable and non-potable categories. 12

Para. 4.4.2.2 Public Services, etc.. (page 4-42) The third paragraph discusses the presumed supply of 6,600 afy, but fails to mention that 1,400 afy of that amount must come from the deep aquifer. The fourth paragraph discusses reclaimed water but does not discuss a source for that water. MCWD has the only known entitlement which is prior to the Castroville Seawater Intrusion Project. The fifth paragraph discusses desalination but does not 13

mention the possibility that such water might come from Marina Coast Water District. The DEIR should evaluate, or at least discuss, this possibility. 13

(page 4-43) Conservation Element Under Program B-1.1 and Program C-3.1, the water supplier should be included in those entities involved in identifying potential reservoir and impoundment sites and in estimating the current safe yields. Also, a new Program C-3.3 should be added to read: "The City/County shall take action to protect and prolong the useful life of the deep aquifer of the Salinas River Groundwater Basin." 14

Para. 4.6.2.2 Public Health and Safety. Emergency Response... (page 4-58) MCWD should be included in development of fire suppression water system guidelines and implementation plans. It should be noted that there is concern about the ability of the present water system to respond to fire emergency demands. 15

Para. 4.6.2.5 Exposure to Unexploded Ordnance. Safety. (page 4-64) An additional program should be added to provide unexploded ordnance support for utility excavations. 16

Para. 4.7.4.2 Traffic and Circulation... (page 4-87) All jurisdictions should coordinate placement and construction of streets and roads with placement of underground utilities. 17

Para. 4.10.2.9 Biological Resources. Environmental Impacts: Conflict with Monterey Bay National Marine Sanctuary Goals and Management Plan. (page 4-143) Mention should be made of the need to coordinate the probable need for one or more desalination facilities to serve Fort Ord lands with the policies of the MBNMS. 18

Para. 4.13.2 UCMBEST Impacts. Public Services and Water Supply (page 4-160), and Table 4.13.1, Impact 4.4 (pages 4-167 & 4-168) Like the other successors to the US Army, UCMBEST should acknowledge its approval and intention to comply with the Fort Ord Annexation Agreement with MCWRA. There should be a strong water conservation policy and a policy to utilize recycled and reclaimed water wherever possible, including the separate landscape plumbing of all appropriate new facilities. 19

Para. 5.1.4 Other CEQA Considerations. Cumulative Impacts. (pages 5-4 & 5-5) Mention should be made of the Annexation Agreement and Mitigation Framework between the City of Marina, MCWRA, MCWD and others. There should be specific mention of the potential water storage site reserved under the Agreement by the J.G. Armstrong Family for MCWD. Specific mention should be made of the possibility of obtaining desalinated and reclaimed water from MCWD. 20

Para. 6.1.1 Alternative 6R. Mitigation Summary. (page 6-3) The reuse plan alternative ultimately adopted by FORA must contain provision for public utility easements and information on buried utilities infrastructure as are mentioned in the mitigation summary. 21

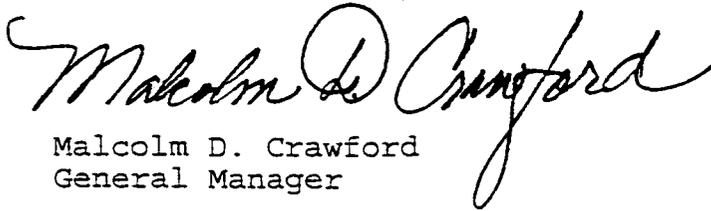
for Alternative 6R.

21

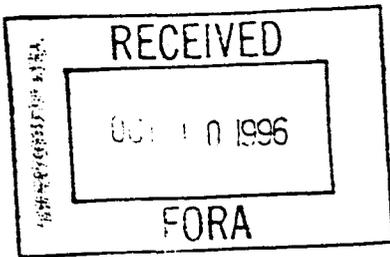
General Comments: At least initially, say through 2010, the upgrading of the intertie between the Fort Ord water system and the MCWD water system and the coordinated operation of the two systems will require less construction of new facilities, and thus have less associated environmental impacts, than operating the systems independently. The merging of the two water systems provides a unique opportunity for regional economic and environmental benefits. In addition, MCWD's entitlement to recycled water from the Regional Treatment Plant and the planning and concepts for the use of recycled water embodied in the Groundwater Mitigation Framework are unique resources available to the Fort Ord lands. The EIR should comment on and evaluate the potential environmental benefits and impacts of these resources. The same sort of examination should be afforded to the potential availability of desalinated water from MCWD.

22

Sincerely,



Malcolm D. Crawford
General Manager



Robert Hale
813 Cypress ST
Monterey, CA 93940

9 October 1996

Fort Ord Reuse Authority,

I am submitting the following comments on the Draft EIR on the Fort Ord Reuse Plan.

The proposed project is too large and goes well beyond a reasonable replacement of lost economic activity, exceeds availability of water resources and excessively destroys coastal oak woodlands.

1) Why is an alternative which does not exceed the available water supply of 7000 acre feet and which is constrained to already developed or conveyed areas of Fort Ord not considered? Please develop an alternative that uses only 7000 acre feet of water and restricts development to current developed areas and those already conveyed, while preserving the remaining habitat and replacing the lost economic output of former Fort Ord.

2) Reuse plan overestimates the impact of closing Fort Ord (population only declined 19000 vs. 32000 forecast). Please develop a 1996 update of the socio-economic conditions and update scope of project.

What was the total economic impact of soldiers and civilian employees in terms of wages, taxes paid and services used?

What number of new civilian jobs would equal the economic impact of Fort Ord closure?

Please document development options that would recoup only the inflation adusted economic loss. Would the CSUMB and UC developments alone replace this loss?

3) Regional growth inducement of project is a significant impact.

How many additional regional jobs/houses will be created by Fort Ord redevelopment?

How will impacts from induced growth and the project-- such as increased tourism, traffic, loss of quality of life due to congestion -- be mitigated. How will mitigation be financed in communities such as Pacific Grove and Monterey?

Please construct an alternative with a lower jobs/housing ratio. The current project proposes too many jobs and will induce excessive growth.

How will increased urban runoff be controlled? What is the demonstrated efficiency of removing urban pollution runoff?

How much more airplane and jet aircraft traffic will Monterey airport experience? Recent increases in small jet flights has been quite noticeable.

I request that the noise impact along the flight approach over Pacific Grove and New Monterey be documented as I consider it a potentially significant impact. Prepare some mitigation to lessen the impact of air flights on the Monterey area.

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4) Loss of coastal live oak woodlands.

The significant forest north of Eucalypus Rd is heavily developed in proposed project. These dense multitruncked forests differ substantially from the open tall interior forests. Prepare an alternative that preserves contiguous forest in polygons 19a, 21a, 21b as natural oak forest. Mitigation can not lessen wholesale replacement and fragmentation of large contiguous woodlands.

11

5) Development adjacent to natural areas

How will impact of lighting be controlled? I am concerned about the use of bright lumen-arc lighting since it is very intrusive. What will be the screening or shielding standards for high intensity lighting?

12

6) Highway 68 bypass

I request that the impact to BLM preserve lands as to acreage lost, visual impact and noise impacts be documented. The current proposal places the freeway in the upper canyons of the BLM preserve which will degrade the surrounding preserve (a significant impact).

13

Will mitigation proposed for Laguna Seca recreation area force the freeway bypass further north into the preserve? If so, I am very much against it.

14

Why is a freeway needed when a 4 lane existing road can handle the projected 2015 traffic of 34000 vehicles and plans for mass transit have not been explored?

15

I request that an alternate corridor for the bypass be identified that avoids passing north of Laguna Seca such as crossing Laguna Seca on the slopes south of the race track.

16

7) Transportation

Why does the plan fail to have a high speed transit corridor directly from North Salinas area across the developed area of Fort Ord? That is where all the growth is going to occur in the future. The multi-modal corridor is clearly needed.

17

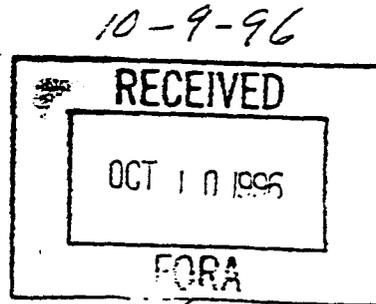
Have the trends for tele-commuting and development of mass transit options been adequately addressed in the traffic estimates?

18

Thank you for your consideration,

Robert Hale
Robert Hale

FORA
100 12th St.
Marina, CA 93933



Please, please cut back
your reuse plan for Fort Ord
— come up with something
that is more fiscally
sound & environmentally
safe. And be sure there's
money to cover new roads
etc. Also enough water.
Make us proud to have
it, not hate it.

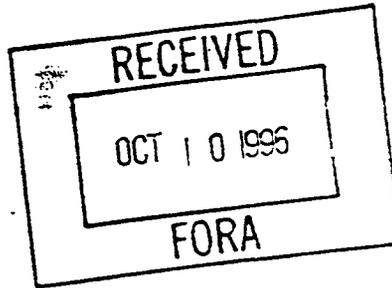
Joan M. Neutges
P O Box 452
Carmel Valley CA. 93924

Ian L Warder

1234 Buena Vista Ave., Pacific Grove, Ca. 93950

408-646-5430

Ford Ord Reuse Authority,
100 12th St., Bldg 2880,
Marina, Ca. 93922



Oct 7th 1996

Dear Sir,

The FORA Project DEIR is not the kind of economic conversion that I consider appropriate for this military base. This project is not compatible with the original FORA objectives or with CEQA, and it seriously jeopardizes our existing industries, tourism and agriculture. The growth factor built into this project is 5 times our historic rate. The FORA draft EIR is a flawed document, that should be completely revised. You should formulate a realistic plan that uses on-site, safe-yield water and gives a full disclosure of environmental impacts.

Sincerely

OCT. 8, 1996

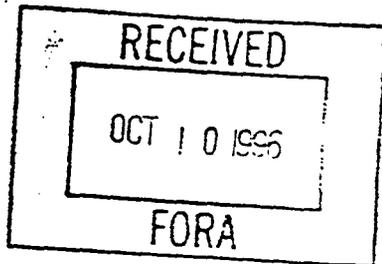
Dear members of F.O.R.A.,

I am writing to express my concerns about the current Ford Ord Reuse Authority DEIR. The total impact of the project described to our beautiful Monterey Bay area is immense, yet the data provided by the consultants in the DEIR is meager.

I would like to see a revised DEIR that would formulate a realistic plan using on-site, safe yield water and that would give us full disclosure of environmental impacts.

Sincerely,

Jusan Lebowitz
1257 Shell Ave.
Pacific Grove, CA
93950



**COMMENTARY ON THE PUBLIC DRAFT OF
THE FORT ORD REUSE PLAN**

**By: Mid-Peninsula Housing Coalition
658 Bair Island Road, Suite 300
Redwood City, California 94063**

**Fran Wagstaff
Executive Director
(415) 299-8000**

Date: October 6, 1996

Mid-Peninsula Housing Coalition (MPHC) would like to address and comment on four issues pertaining to affordable housing for low-income households that were not adequately discussed in the public draft of The Fort Ord Reuse Plan dated May 1996.

The four issues are the following: the cost burden of housing in the three local counties (Monterey, San Benito and Santa Cruz) that surround Fort Ord, proposed programs to provide affordable rentership of Fort Ord residential properties, the current and future physical deterioration of the existing residential inventory on Fort Ord, and insuring an adequate water supply for the current residential units and ones to be developed in the future.

ISSUES

Cost Burden

As housing costs increase for a household, there is less money available for other necessities. In many cases, a housing payment (mortgage or rent) may leave the household with insufficient resources for food, clothing and other necessities. This scenario is considered a "cost burden" on the household referring to a total housing cost in excess of thirty percent (30%) of household gross income. (for complete definitions of cost burden and household, please see the adjacent Pertinent Definitions section.)

In the three local counties of Monterey, San Benito and Santa Cruz that surround Fort Ord, the cost burden of housing is a serious problem, and MPHC feels this issue should be thoroughly presented and discussed in the finalized Fort Ord Reuse Plan.

Housing problems are particularly acute for renter families. Based on the 1990 census, over one-third of Monterey, San Benito and Santa Cruz counties' renter households are low-income and significant majorities pay more than 30% of their gross incomes for housing costs. Even in the income range of \$20,000 to 34,999, which includes the median income figures for renters in these counties, a substantial amount of these renters spend more than 30% of their income for housing with Santa Cruz County having the highest percentage with over 50% of its renter households being in this category.

Though these comments are based on 1990 census figures, MPHC feels these figures still have relevance since the ratios of income to rent have shown no sign of improvement in the past six years. MPHC proposes that the final draft of the reuse plan include a discussion of this issue, since Fort Ord has the potential to have a major impact on the local housing market, which clearly includes both ownership and rental housing.

While we recognize that some of the communities surrounding Fort Ord already have substantial inventories of rental housing, we believe it would be a mistake to exclude significant rental housing opportunities from Fort Ord. A strategy of strictly focusing on homeownership at Fort Ord will, in the long run, serve to create economic and ethnic divisions, and will go counter to a full integration of Fort Ord into the fabric of existing communities.

Proposed Programs

The cities and counties surrounding Fort Ord as well as F.O.R.A. must seek to expand the supply of affordable rental housing on Fort Ord through supporting programs like ones mentioned in this commentary as well as other programs. In particular, their respective housing, community and development and redevelopment agencies must together fully support and implement these programs to insure that affordable housing will be a viable and successful part of the reuse plans for Fort Ord.

One example of such a program could be to focus on affordable rentership opportunities by renting existing and occupiable properties which may not be of marketable sale quality, but none-the-less will be suitable for renters. This would be a win-win situation for all parties involved. The renter would have affordable housing that is safe and adequate while the ownership/lessor entity (whether a public or private entity) would manage the property for a return on its investment, and the city in which the property is located in would fulfill some of its housing obligations under California state laws. Also, this pool of renters could eventually move up to become home of buyers of other homes on the base.

Another approach is for F.O.R.A. to encourage private involvement in providing new affordable rentership opportunities through financing sources like tax credits, tax-exempt bonds, Federal Reserve Bank affordable housing loans, and community reinvestment loans through commercial banks as well as HUD funds. These programs could target lower income families than possible through ownership, and therefore encourage a better economic mix at Fort Ord.

The pertinent public agencies should apply for or support developer applications for subsidized public financing that may from time to time be available.

Physical Deterioration

The third issue is the physical deterioration of the existing Fort Ord housing inventory. It is a concern which must be fully addressed in a strategic manner in The Fort Ord Reuse Plan. As the residential units and facilities continue not to be used and therefore not attended to on a daily basis, there will be further deterioration that will be more costly to remedy as time goes on.

F.O.R.A. should apply for all program funds available to preserve and maintain the existing housing stock where appropriate and encourage and support applications on the part of other organizations such as non-profit agencies and for-profit companies for such funds.

The final reuse plan should include a long term strategy for renovation and occupation, or demolition of the residential units and facilities on the former base. In addition, this strategy should address suitability of the housing for different income groups and household types.

Water Supply

The fourth issue is an adequate and safe supply of water for the current and future residents of the Fort Ord base; this also must be fully addressed within the reuse plan. As the populations on the former base and of the surrounding communities grow as projected in the draft reuse plan, plans and strategies must be formulated to insure a water supply for these residents.

This issue is critical to the overall success of the long term development of Fort Ord. The final plan must have some focus on this issue to insure an adequate water supply must be available for all uses including residential.

Conclusion

Fort Ord has exceptional potential in terms of the reuse of the existing inventory and future development. We suggest that the plan be more inclusive in looking at housing issues and opportunities for all segments of the housing market in the area.

Company Qualifications for Commentary

Mid-Peninsula Housing Coalition (MPHC) is a non-profit organization which, during the past twenty-six years, has developed some three thousand housing units, including rentals for families and first time ownership units. These units are located throughout the Bay Area's Peninsula

counties and Santa Cruz County. All have been affordable to low and moderate income households, and numerous projects have received awards and recognition for excellence in concept and design.

The development staff has accounting, financial, legal, design, planning and development expertise. Two architects, a contractor and maintenance coordinator staff our construction department and oversee maintenance and construction projects. Mid-Peninsula Housing Coalition does all the marketing and pre-leasing of all units prior to completion of construction.

Our affiliated management company, Mid-Peninsula Housing Management Corporation manages all of Mid-Peninsula Housing Coalition's rental housing, plus rental housing owned by others. Its staff includes a director, five district managers, and a strong support staff including an accounting department.

PERTINENT DEFINITIONS

Cost Burden: The extent to which renting costs (rent, utility, or ownership costs, principle, interest, insurance, taxes) exceed 30 percent of gross income, based on data published by the U.S. Census Bureau.

Household: As defined by the Federal Bureau of Census, household includes all the persons who occupy a housing unit. A housing unit is a house, an apartment, a mobile home, a group of rooms, or a single room that is occupied as separate living quarters. The occupants may be a single family, one person living alone, two or more families living together, or any other group of related or unrelated persons who share living arrangements.

Moderate Income: Households whose incomes are between 81 percent and 95 percent of median income for the area with adjustments for smaller or larger families as determined by the Federal Department of Housing and Urban Development.

Low-Income: Households whose incomes do not exceed 80 percent of the median income for the area with adjustments for smaller or larger families as determined by the Federal Department of Housing and Urban Development.

Very Low Income: Households whose incomes do not exceed 50 percent of the median area income for the area with adjustments for smaller and larger families as determined by the Federal Department of Housing and Urban Development.

(FORA.DOC)

HOUSEHOLD RENTERS: 1989

	<u>Monterey County</u>	<u>San Benito County</u>	<u>Santa Cruz County</u>
Analysis of Renting			
Monthly Housing Costs for a Renter as a Percentage of Household Income in 1989	<u>% of Total Renter Households</u>	<u>% of Total Renter Households</u>	<u>% of Total Renter Households</u>
<u>Income Less Than \$10,000</u>			
% of Total Renter Households	12.2%	12.4%	17.0%
30 to 34 percent of income:	3.9%	2.0%	5.1%
35 percent of income or more:	88.8%	74.2%	72.5%
<u>Income \$10,000 to \$19,999</u>			
% of Total Renter Households	22.1%	22.2%	20.3%
30 to 34 percent of income:	9.0%	9.7%	9.0%
35 percent of income or more:	61.0%	54.8%	72.5%
<u>Income \$20,000 to \$34,999</u>			
% of Total Renter Households	33.2%	32.7%	27.9%
30 to 34 percent of income:	15.0%	7.3%	15.7%
35 percent of income or more:	22.8%	17.0%	40.6%
Total Household/Renter Population	54,311	3,966	32,679
Renting Household Median Income	\$26,348	\$26,663	\$26,007

Source:

1990 Census of Housing

Table 51: Financial Characteristics

Table 68: Financial Characteristics

Table 69: Household Income Characteristics

OCTOBER 03, 1996

DEAR FORA BOARD MEMBERS:

THE CURRENT EIR FOR THE RE-USE OF FORT ORD IN ITS CURRENT FORM IS A NO BRAINER....MAINLY BECAUSE IT DOES NOT SERIOUSLY ADDRESS THE ENVIRONMENTAL AND, ECONOMICAL CONCERNS THAT THE FORA BOARD MEMBERS PAST AND PRESENT HAD PROMISED TO ADDRESS WHEN THE TIME CAME... WELL THE TIME IS NOW STANDING RIGHT BEFORE THE FORA BOARD AND I BELIEVE IF I AM GIVEN THE OPPORTUNITY TO ADDRESS ALL OF THE FORA BOARD MEMBERS WITH A THOROUGH PRESENTATION, FOLLOWED WITH A QUESTIONS AND ANSWERS EXCHANGE BETWEEN MYSELF AND THE FORA BOARD MEMBERS, I BELIEVE THAT YOU WILL SEE THAT WHAT I HAVE TO OFFER IS EXCEEDINGLY BETTER THAN WHAT IS CURRENTLY BEFORE YOU FOR CONSIDERATION.

I LOOK FORWARD TO HEARING FROM YOUR STAFF,

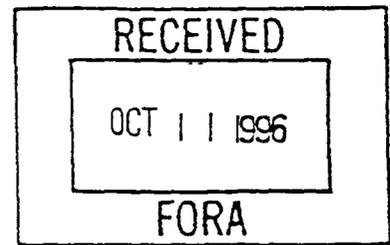
SINCERELY YOURS,



GILBERT SANTIAGO
PRESIDENT SDS
P.O. BOX #1216
MARINA, CA 93933
(408)384-5959

326

CITY HALL
BOX CC
CARMEL-BY-THE-SEA, CALIFORNIA 93921



10 October 1996

VIA FACSIMILE TRANSMISSION
883-3675

The Honorable Jack Barlich
Chairman
Fort Ord Reuse Authority
Building 2880
100 12th Street
Marina CA 93933

Dear Chairman Barlich:

The City of Carmel-by-the-Sea requests that, at a FORA Board Meeting soon after the closure date of the comment period on the Draft Environmental Impact Report on the Fort Ord Reuse Plan, an item be placed on the Board's agenda for discussion to include a revised Draft EIR. Also included in the discussion should be funding sources and other items pertinent thereto.

The strong public concern being expressed in our community about the Reuse Plan and the tremendous impacts that it will have on all of our communities emphasizes the vital importance of having a thorough discussion of those impacts now. In support of this request we call attention to CEQA case law (City of Antioch v. Antioch City Council): "Unless cumulative impacts are analyzed, agencies tend to commit resources to a course of action before understanding its long-term impacts, thus a proper cumulative impacts analysis must be prepared before a project gains irreversible momentum."

Thank you for your consideration. We look forward to working together for the betterment of the entire Central Coast that will surely ensue if the Reuse Plan that is finally adopted is given the full and careful attention it deserves.

Very truly yours,

A handwritten signature in cursive script that reads "Ken White".

Ken White
Mayor

KW:sam

c: All Members of the FORA
Board of Directors
Mr. Les White, FORA Executive
Officer
Members of the City Council
City Administrator

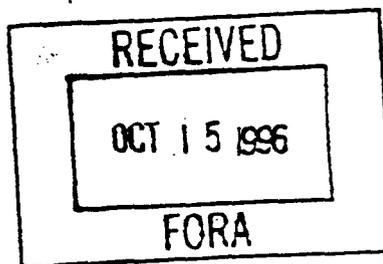


CALIFORNIA STATE UNIVERSITY, MONTEREY BAY

The Watershed Institute

100 CAMPUS CENTER
SEASIDE, CA 93955-8001

fax rec'd Oct 11



October 11, 1996

Mr. Les White, Executive Director
Fort Ord Reuse Authority
100 12th Street, bldg. 2880
Marina, CA 93922

Dear Mr. White,

This represents the comments of CSUMB's Watershed Institute on the DEIR for the Fort Ord Reuse Plan. The Watershed Institute is a component of the Earth Systems Science and Policy Institute at CSUMB, and is comprised of planners, scientists, educators, farmers, and public officials dedicated to restoring the degraded watersheds of the Monterey Bay area. We use restoration, education, research, and policy approaches with a focus on on-the-ground restoration demonstration projects that illustrate the feasibility and broad benefits of restoring and protecting wet corridors.

We have found the DEIR to be unacceptably flawed relevant to proposed water requirements, scope of buildout, and loss and degradation of unique habitats. On nearly every front, it fails to fulfill the requirement of the California Environmental Quality Act (CEQA) that an EIR be "a good faith effort at full disclosure of the impacts of a stable, finite project description." Particularly disturbing is the consistent lack of specifics in project descriptions, potential impacts, and requirements with which to hold project operations accountable. We therefore recommend a substantial revision of the DEIR, with development scaled far back to better accommodate the real needs and limitations of surrounding cities and the Monterey Peninsula, and the extraordinary environmental legacy of former Fort Ord.

For specific comments related to water use, water quality, wastewater treatment, transportation issues, and buildout plans, we refer to the comments of the Association of Monterey Bay Area Governments, the City of Salinas, the Monterey County Board of Supervisors, the Sierra Club, and the California Native Plant Society. The essence of these agencies' comments are that a) the DEIR has not adequately described where the additional 12,000 acre-feet of water in addition to that existing on-site, will be found, b) the projected increase in wastewater and traffic is not workable, and c) the scope of buildout far exceeds the capacity of the Monterey Peninsula, in keeping with FORA's objectives as defined by Congress, and Monterey County plans.

Specific comments related to loss and degradation of habitat are as follows:

1. pg. 2-14. There is no basis on which to conclude that the impact on HMP habitats and maritime chaparral in the No Project alternative will have "more potential for degradation/isolation from lack of active habitat management," given that the No Project alternative would result in less overall disturbance. The implication that "isolation" of habitat is a drawback in terms of habitat integrity is unfounded.

2. pg. 2-14 - 2-15. The statement that effects on coast live oak woodland and removal of sensitive species not addressed in HMP "would be reduced with required policies and programs" is an unjustifiable claim given the inadequacy of the proposed policies and program, detailed below in comment number 11. 2
3. pg. 4-10. In the Land Use Compatibility Impacts section, the described mitigation is not adequate to the impact of proposed developments on adjacent open space areas. Having Monterey County "review each development project" and "require suitable open space buffers" as a condition of project approval is un reassuring. No specifications are made as to review criteria or open space buffer requirements; as written, such criteria are at the complete discretion of the reviewer. Will the county have the staff and time to sufficiently review project applications, and will natural resource management agencies have any oversight of project plans? 3
4. pg. 4-12. The mitigation described for the expansion of highway 68 is not specific to the site, thus is irrelevant to the project. The text must present a defensible mitigation or declare the highway expansion an unmitigatable impact. 4
5. pg. 4-49. Golf courses are not a "park-like setting"; this language should be changed to realistically portray golf courses as an intensive suburban use. The DEIR does not adequately describe how Frog Pond will be protected from water quality and other impacts related to the golf course and hotel. "Addressing nonpoint source groundwater contamination...during separate environmental review" is inadequate as a mitigation measure. 5
6. pg. 4-52. It is preposterous to speculate that "a net increase in overall recharge could potentially be achieved with urbanization." Please cite evidence that this has occurred elsewhere and thus is in the realm of possibility. 6
7. pg. 4-127. The text fails to describe how "no further mitigation beyond the HMP should be required to satisfy the US Fish and Wildlife Service and the federal ESA." Has USFWS formally agreed to allow for the taking of listed species in areas not under HMP protection? If so, please include this MOU as an appendix, or refer to where it is housed; if no such agreement exists, the text must include species and areas for which section 7 consultation may take place. Also, the text must acknowledge the possibility that more threatened, endangered, or candidate species will be found in proposed development areas, for example the black legless lizard. Projects may be derailed or moved if such species are found at proposed development sites. 7
8. pg. 4-129. The language used in Biological Resources Policy A-7 is far too weak to be likely to provide any benefit to HMP species in areas slated for development. Development in areas with HMP species should be scaled back and clustered. 8
9. pg. 4-136. Removal of 63% of coastal sage scrub habitat at former Fort Ord is a significant impact. 9
10. pg. 4-136. A 36% reduction of annual grassland at former Fort Ord is a substantial reduction and should be deemed a significant impact. Biological Resource Policy B-2 is a woefully inadequate measure to protect sensitive species dependent upon grasslands, especially wide-ranging territorial species such as golden eagle, loggerhead shrike, northern harrier, and prairie falcon. Have burrowing owl nesting colonies been identified, and if so, are they located in grasslands to be preserved or those slated for development? 10

11. pg. 4-137. It is preposterous to conclude that the impact on coast live oak woodlands as a result of the preferred alternative would be "less than significant." The project proposes to demolish 34% of the total acreage at former Fort Ord, which harbors the most significant stand of this habitat type in the state. At least five special status species are very dependent upon these woodlands: the dusky-footed woodrat, the horned lizard, the legless lizard, the Monterey ornate shrew, and the Cooper's hawk.

Oak woodlands are among the most ecologically significant and threatened habitat types in California. As the DEIR acknowledges, California Senate Concurrent Resolution Number 17 mandates that native oak woodlands are to be protected to the maximum extent feasible. Locally, Monterey County Ordinance no. 3420 specifically addresses oak woodland preservation. Therefore, the extent of loss proposed in the preferred alternative is unacceptable.

In addition to the unacceptable loss of acreage, the Biological Resource Policies provided in the DEIR for the protection of oak trees and woodlands in the development setting are far too weak to provide for any real protection. Language such as "encourage clustering of development", "wherever possible", and "should be avoided" render ineffectual these policies. No real requirements or standards are described; only suggestive guidelines.

12. pg. 4-141. DEIR must more fully describe how wetlands evaluations on potential development sites are to be conducted, who is to do them, and under what authority wetlands loss and mitigation will occur.

13. The Biological Resources Policies described to lessen the loss of sensitive species not addressed in the HMP are inadequate. "Striving" to avoid loss of sensitive species, and making "reasonable effort to avoid habitat occupied by these species," in development projects does not constitute real protection. This renders indefensible the DEIR's conclusion of a "less than significant" impact.

14. pg. 6-16 - 6-22. The No Project Alternative. As stated in the DEIR, "although termed No Project, this alternative would include a significant amount of development within the former Fort Ord." Based on the level of development described under this alternative, there appears to be no justification for calling this "No Project" under CEQA. This alternative represents a substantial project.

In the Biological Resources section, the claim that "the overall impact on biological resources for the No Project Alternative could be greater than under the Proposed Project" is completely without grounds. It is extremely unlikely that the "lack of active habitat management" would result in greater harm to biological resources than removal of habitat associated with development. This argument should be removed where it appears throughout the DEIR.

This concludes our comments. We look forward to a timely and appropriate response from FORA and other relevant public officials. Thank you for your time and attention.

Sincerely,



Anna Weinstein
Policy Analyst

cc: Ray Bransfield, USFWS
Deborah Hillyard, CDFG
Terry Palmisano, CDFG
Tami Grove, Coastal Commission
Maggie Fusari, UC Santa Cruz Natural Reserve System
Frank Barron, AMBAG
Chris Tennyne, Audubon Society
Steve Addington, BLM
Art Mittedorf, Sierra Club
Corky Matthews, California Native Plant Society



CALIFORNIA STATE UNIVERSITY MONTEREY BAY

100 Campus Center Seaside, California 93955-8001

October 11, 1996

Les White, Executive Officer
Fort Ord Reuse Authority
100 12th Street Building 2880
Marina, CA 93933



Subject: Comments on Draft Fort Ord Reuse Plan

Dear Mr. White:

California State University, Monterey Bay (CSUMB) appreciates the opportunity to comment on the Fort Ord Reuse Authority (FORA) Fort Ord Reuse Plan (the Reuse Plan). CSUMB's comments on the Reuse Plan are provided below. As requested by FORA, comments on the Draft Environmental Impact Report (DEIR) are provided under separate cover.

In general, the Reuse Plan does not consider the sovereign redevelopment authority that was established by the Fort Ord Reuse Authority Act (the Act) in Government Code Sections 67650 *et seq* for the California State University (CSU), the governing body and owner of the CSUMB campus. As such, the baseline land use and financial planning assumptions of the Reuse Plan are inaccurate. The applicable provisions of the Act, as they relate to the provisions of the Reuse Plan, are as follows.

Governing Authority of CSUMB

Section 2.1.1 of the Context and Framework (Reuse Plan Volume 1) does acknowledge that all transferred Fort Ord property must be used in a manner consistent with Reuse Plan "except for property transferred to the California State University or the University of California that is used for educationally related or research-oriented purposes..." (page 2-2). However, the text does not inform the public of the legislative background supporting this statement nor the implications of this exemption to implementation of the Reuse Plan and Business and Operations Plan.

The Act makes a clear distinction between the powers and duties of the state and those of local agencies. As a State entity, CSU was designated a redevelopment authority. "Redevelopment authority" is defined in subdivision (j) of Section 67655 to mean:

The Fort Ord Reuse Authority except that with respect to property within the territory of Fort Ord that is transferred or to be transferred to the California State University or the University of California, "redevelopment authority" solely for purposes of the transfer of property at military bases pursuant to Title XXIX of the National Defense Authority Act for the 1994 fiscal year means the California State University or the University of California, and does not mean the Fort Ord Reuse Authority.

The Act further states this title shall not be construed to limit the rights of the California State University to acquire, hold, and use real property at Fort Ord for locating or developing educationally related or research oriented facilities on this property (Section 67678 subdivision (e) and (f)). Thus, the powers and duties granted to FORA, which include the planning, financing, and management of the reuse of Fort Ord (e.g., preparation and implementation of a Reuse Plan), do prevail over local entities, however they do not prevail over the powers and duties of the state.

Finally, the relationship between the State of California and the jurisdictional authority of local public entities is also addressed here. California case law has established that the state, when creating municipal governments does not cede to them any control of the state's property situated within their jurisdictional boundaries. Therefore, as an agent of the state, a local municipal government (e.g., a city or a county) is not an independent body, and its governing authority is thereby limited to that expressly granted to it by the state.

Financial Provisions Governing CSUMB

As an entity of the State of California, the financial obligations and transactions of CSUMB are highly regulated. Based on various legislative provisions and court decisions, CSUMB is precluded from paying fees to other entities. In some specific cases, however, CSUMB is permitted or obligated to pay certain fees or costs.

The following description addresses three fees or costs, associated with reuse of former Fort Ord property to establish a CSU campus, that may be applicable to CSUMB: 1) annual FORA operations fee, 2) negotiated "capital facilities fee", and 3) cost of goods and services.

The Fort Ord Reuse Authority Act specifies that the CSU contribute \$7,000 each fiscal year to FORA's operations. Two other funding related sections of the Act address CSUMB's financial relationship with FORA. Section 67691 provides:

The board and the member agencies may provide by contract for the transfer to the board or between member agencies of revenues available from sales tax, property tax, or other sources in order to help finance the cost of paying for services or capital facilities to serve or enhance the development of Fort Ord...

In addition, Section 67692 provides:

The board shall consider a program of local revenue sharing among the member agencies to ensure an equitable apportionment of revenues generated from the reuse of Fort Ord among those member agencies responsible for the provision of services to Fort Ord and member agencies that assist in the funding of services to Fort Ord.

Since CSUMB is not a "member agency" of FORA, neither the payment of revenues nor the apportionment of revenues generated are applicable. A provision of the Act that does have financial implications for CSUMB is Section 67685:

The applicability of any capital facilities fees imposed under this title to public educational agencies shall be subject to the provisions of Chapter 13.7 (commencing with Section 54999) of Part 1 of Division 2 of Title 5.

This provision refers to a "capital facilities fee", which is a special assessment imposed by local entities for the payment of additional capacity required in order to provide additional sewer or water hookups to a public educational agency. The terms of the fee are negotiated between the public entity and the public educational agency.

Other than the Fort Ord Reuse Authority Act, CSUMB's ability to make financial contributions is further addressed by case law and other state laws. For example, the state has determined that public entities (e.g., CSUMB) are exempt from property taxation, and that there is an implied exemption of property of the state from a special assessment for a street or other local improvement, unless a legislative provision is enacted.

Although local public entities are generally forbidden to tax the state, it has been established that when one tax-supported entity provides goods or services to another, the public entity is not exempt from paying for these goods and services. However, in order for the state to expend state money, the state must receive in return a benefit that has some relationship to the amount spent. Without definition of a clear relationship, this type of payment could be interpreted as a gift of public funds, which is prohibited by the California Constitution.

Applicability of the Draft Fort Ord Reuse Plan

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Each of the provisions cited above describes the framework within which CSUMB must conduct itself and how that context applies to the Reuse Plan. As such, it becomes apparent that CSUMB, an educational entity of the State, is not permitted to accept or comply with many of the provisions of the Draft Fort Ord Reuse Plan as it is currently written.

From a land use planning perspective, it has been established that the provisions and mandates of the Reuse Plan are not applicable to CSUMB. However, CSUMB is required to comply with comparable state land use planning requirements. As such, CSUMB is currently in the process of preparing its Campus Master Plan. Similar to the guidance provided by the Reuse Plan to FORA and the local member agencies, the Master Plan will identify the land use program, policies, student enrollment projections, and design guidelines to guide CSUMB's development of the campus at former Fort Ord. As such, the CSUMB Campus Master Plan will supersede the Reuse Plan in the development and reuse of state property by CSUMB. Although the policies proposed by the Reuse Plan are not applicable to CSUMB, the University intends to continue to coordinate its master planning efforts through open communication and consultation with FORA, its member agencies, and non-voting member agencies. Since the master planning efforts began in November, 1995, CSUMB has conducted numerous open public meetings to share information and development concepts as they are prepared and to gain input and guidance from the community. CSUMB intends for the Campus Master Plan to respond to the needs and desires of the region it directly serves, as well as the goals of the campus community.

Applicability of the Business and Operations Plan

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As established by state statutes (previously described), CSUMB is required to pay: 1) the annual FORA operations fee, and 2) a negotiated "capital facilities fee" for additional capacity required to provide additional sewer or water hookups over and above existing conditions. In addition, CSUMB is permitted to pay a fee for goods or services to another tax-supported entity in an amount directly related to the benefit received.

Within these parameters, the Business and Operations Plan in its current form cannot be accepted by CSUMB, primarily due to the lack of a direct quantified relationship between the impact fee assessed to CSUMB and the "goods and services" to be received. In other words, "fair share", as defined in the Business and Operations Plan, precludes CSUMB from participating in the plan in compliance with state law.

For example, several of the calculated infrastructure costs allocated to CSUMB are based on assumptions regarding the amount of new housing construction. ✓

on the campus. Until the Campus Master Plan is adopted, which will specify the growth in housing that will be needed to support the campus population, these assumptions are invalid. The same statement applies to assumptions regarding developable acreage of land development. CSUMB's Master Plan will ultimately determine this figure, not the Reuse Plan.

This consideration is especially relevant to the University in its calculation of costs for goods and services. Any amount that is not directly related to actual services rendered by a local public entity, or goods provided by that public entity, or in the case of the Reuse Plan subsidizes the development impacts of other entities, may be deemed by the state as a gift of public funds.

As a final note, the Business and Operations Plan does not provide background calculation sheets. Without the ability to review the calculations and mathematical assumptions used in the analysis, CSUMB cannot comment on their accuracy nor provide FORA with an alternative analysis.

CSUMB As Existing Land Use

The Reuse Plan does not consistently acknowledge the CSUMB campus as an existing land use. As a result, conclusions of the Reuse Plan that are based on an analysis of existing conditions may not be accurate. For example, the locations in the Reuse Plan where CSUMB should be identified as an existing land use include, but are not limited to, the following:

Volume 1: Section 3.2 - Existing Setting and Character of Fort Ord, Figure 3.2-3 - Draft Regional Land Use Context, Figure 3.2-4 - Draft Existing Development.

Volume 2: Figure 4.1-1 - Draft Existing Development Pattern at Fort Ord, Figure 4.1-3 - Draft Generalized Land Use Setting, Section 4.1 in the description of existing land use conditions in Marina, Seaside, and Monterey County.

General Comments

Volume 1, page 3-86 incorrectly states: "The HMP identifies the establishment and maintenance of an oak habitat corridor through this area [south of Inter-Garrison Road] to connect preserved oak woodlands to the north and south as a desirable goal." The September, 1996 HMP does not contain such a statement.

Page 3-99, first paragraph: The Reuse Plan's land use concept for ultimate development map is inconsistent with the total property acreages identified in the text as part of the CSUMB campus. While the map includes the excess parcel containing the stadium, the total property acreage count does not include this parcel. To make the acreage consistent with the map,

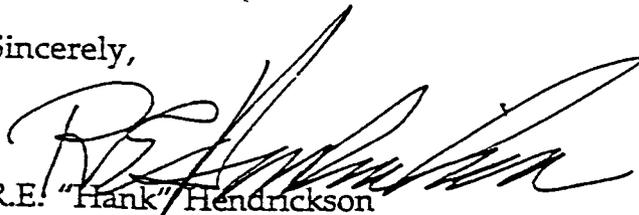
CSUMB should be identified as containing approximately 1,350 acres throughout the Reuse Plan. This paragraph should also be updated to indicate that the University is now operating with a fall, 1996 enrollment of approximately 1,100 full-time equivalent students. The University has completed Phase I renovation of 21 buildings; Phase II is currently in progress with an additional 10 buildings.

Design Guidelines

CSUMB supports FORA in its efforts to prepare comprehensive design guidelines as part of, or supplementary to, the Reuse Plan. Our staff is available to provide input to this process.

CSUMB is committed to establishing a distinctive university for this community based on quality and access. We look forward to a continuing relationship with FORA in providing a quality community at the former Fort Ord. Thank you for considering CSUMB's comments. Should you have any questions or require additional information, please contact Mr. David Salazar at 582-3335 or Ms. Trisha Lord at 582-3603.

Sincerely,



R.E. "Hank" Hendrickson
Vice President for Administration

- c Peter Smith, CSUMB
- Maria Pantoja, CSUMB
- David Salazar, CSUMB
- Steve Reed, CSUMB
- David Rosso, CSU
- Bruce Richardson, CSU



CALIFORNIA STATE UNIVERSITY MONTEREY BAY

100 Campus Center Seaside, California 93955-8001

October 11, 1996

Les White, Executive Officer
Fort Ord Reuse Authority
100 12th Street Building 2880
Marina, CA 93933

Subject: Comments on Draft Fort Ord Reuse Plan Environmental Impact Report

Dear Mr. White:

California State University, Monterey Bay (CSUMB) appreciates the opportunity to comment on the Fort Ord Reuse Authority (FORA) Fort Ord Reuse Plan (the Reuse Plan). Comments on the Draft Environmental Impact Report (DEIR) are provided below. As requested by FORA, CSUMB's comments on the Reuse Plan are provided under separate cover.

General Comments

As established in CSUMB's comment letter (October 11, 1996) on the Reuse Plan, the University is a state agency and therefore exempt from the provisions of the local Reuse Plan. As such, any impact analysis in the DEIR that requires specific actions to be taken by CSUMB to reduce the impact is inaccurate. Although CSUMB will continue to coordinate closely with FORA in land use planning issues and preparation of our Campus Master Plan, as we have in the past, the University is governed by state law. The provisions of the Reuse Plan have not been shown to be compatible with the state provisions and regulations CSUMB is required to comply with.

As stated in our comment letter on the Notice of Preparation, land use assumptions (e.g., number of new housing units, faculty and staff, infill potential, etc.) used to analyze CSUMB's designation in the Reuse Plan are speculative in advance of the CSUMB Campus Master Plan currently being prepared.

Throughout the DEIR, the preparation of future studies and future adoption of policies and programs are oftentimes incorporated as mitigation to reduce potentially significant impacts to a less than significant level. Reliance on future events is not an effective form of mitigation unless measurable

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outcomes, minimum performance standards, and monitoring programs are required in conjunction. Otherwise, there is no evidence that the proposed mitigation will in actuality have the desired mitigating effect. 10

The DEIR does not consistently acknowledge the CSUMB campus as an existing land use. As a result, conclusions of the DEIR that are based on an analysis of existing conditions may not be accurate. For example, Figure 4.1-2 - Generalized Land Use Setting and accompanying text should refer to the existence of a portion of the CSUMB campus within the boundaries of the cities of Marina and Seaside and the County of Monterey. 11

Section 4.1 - Land Use 12

The DEIR states that the Reuse Plan includes land uses that "may constitute an incompatible use with the adjacent university area" (e.g., equestrian center, corporation yard, transit station, outdoor amphitheater), particularly the University housing area. The impact analysis relies on programs cited in the Reuse Plan as mitigation for incompatibility of land uses adjacent to the campus. However, these programs require "coordination", changes in city zoning ordinance regulations, "minimization" of impacts, and changes to the Reuse Plan to eliminate the incompatibility. However, the DEIR does not provide any means to ensure that these programs are implemented nor that the outcome will be a less than significant impact. Therefore, these impacts should be identified as potentially significant impacts. If mitigation cannot be provided, these impacts are significant unavoidable impacts.

Section 4.4 - Public Services, Utilities and Water Supply 13

Page 4-36 - Solid Waste should include the solid waste disposal activities currently being conducted at CSUMB as part of the environmental setting.

Page 4-42, first paragraph should acknowledge that the current water supply yields serving former Fort Ord can accommodate a particular level of future needs generated by the Reuse Plan, as evidenced by the water allocation provided to CSUMB for future growth. 14

Section 4.7 - Traffic and Circulation 15

Page 4-65, fourth paragraph refers to CSUMB as a future land use "to be located on former Fort Ord". CSUMB should be identified as an existing land use.

Page 4-89, first paragraph should be revised as follows: For example, CSUMB ~~has discussed plans to operate an internal shuttle, between the campus and surrounding area which connects with the regional transit system,~~ for students, staff and visitors. 16

Section 4.8 - Climate and Air Quality

The policies and programs proposed to mitigate potentially significant air quality impacts rely on future actions and do not ensure that impacts will be reduced to a less than significant level.

Section 4.9 - Noise

Page 4-103, first paragraph: As an institution of higher learning, the text should be revised to include the entire CSUMB campus as a noise sensitive receptor, not just the CSUMB housing area.

Page 4-113: Impact analyses of airports typically address single event noise levels in addition to community noise equivalent levels.

Page 4-114, last paragraph concludes that implementation of noise control policies and programs will result in a less than significant impact. This statement is inconsistent with the Land Use Section, which states that the existence of incompatible land uses requires changes to the Reuse Plan.

Section 4.11 - Visual Resources

Pages 4-147 through 4-148 refer to policies and programs that are proposed to reduce impacts caused by reduced visual quality on-site. However, these provisions rely on the preparation of future design guidelines to reduce the impact without specifying what characteristics will be addressed (e.g., building heights, colors, obstruction of views, landscape design, hardscape design, etc.). The design objectives contained in the Reuse Plan are too broad and general to ensure that these impacts will be less than significant. In addition, "areas of regional importance" are not defined. This designation should include more visually significant areas than just the State Route 1 Corridor.

Page 4-147 identifies two visual impacts to CSUMB: 1) view blockage towards the ocean due to new buildings and increased tall vegetation and 2) new sources of lighting that could cause a visual nuisance to residents near the proposed amphitheater close to CSUMB. The lack of specificity and performance standards of the policies and programs do not ensure that these impacts will be reduced to a less than significant level.

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CSUMB is committed to establishing a distinctive university for this community based on quality and access. We look forward to a continuing relationship with FORA in providing a quality community at the former Fort Ord. Thank you for considering CSUMB's comments. Should you have any questions or require additional information, please contact Mr. David Salazar at 582-3335 or Ms. Trisha Lord at 582-3603.

Sincerely,



R.E. "Hank" Hendrickson
Vice President for Administration

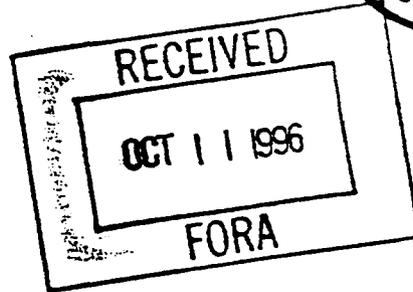
- c Peter Smith, CSUMB
- Maria Pantoja, CSUMB
- David Salazar, CSUMB
- Steve Reed, CSUMB
- David Rosso, CSU
- Bruce Richardson, CSU

MONTEREY COUNTY

LOCAL AGENCY FORMATION COMMISSION

(408) 755-5065 P.O. BOX 180, SALINAS, CALIFORNIA 93902

JAMES J. COLANGELO
EXECUTIVE OFFICER



October 11, 1996

Les White, Executive Officer
Fort Ord Reuse Authority
100 12th Street, Building 2880
Marina, CA 93933

RE: Fort Ord Reuse Plan Draft Environmental Impact Report

Dear Les:

Thank you for the opportunity to review the Draft EIR for the Fort Ord Reuse Plan. As you know, the Monterey Local Agency Formation Commission (LAFCO) will be considering sphere of influence amendments and changes of organization as a result of the reuse of the former Fort Ord.

It was our hope that this document would adequately analyze the environmental issues associated with these proposals. Unfortunately, as stated on Page 3-11, this document does not focus on the potential environmental impacts of the proposed boundary changes.

While this fact will cause the affected jurisdictions to complete additional environmental analysis before filing with LAFCO, this Draft EIR should be changed to reflect the following comments.

Figure 3.6-1 The map incorrectly represents a portion of the City of Monterey's existing sphere of influence, as *proposed*. Please correct this map to reflect the City's existing sphere as shown on the attached map. 1

Page 3-11 Under Section 3.7.3, the County of Monterey is listed as having responsibility for amending spheres of influence and approving annexations. It should be noted that Monterey County has no discretionary authority to amend spheres of influence and only limited (property tax transfer approval) authority over annexations. A separate heading should be provide for the Monterey Local Agency Formation Commission that is separate from any other agency. Consideration should also be given to including the Cities of Del Rey Oaks and Monterey in this list of agencies. 2 ✓

330-1

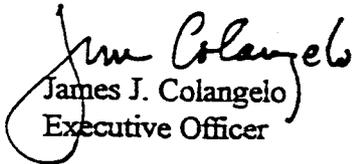
Fort Ord Reuse Authority Draft EIR

October 11, 1996

Page 2

Again, thank you for the opportunity to respond to this document. Please feel free to contact me if you have any questions.

Sincerely,


James J. Colangelo
Executive Officer

Attachment

cc: LAFCO Commissioners
Steve Endsley, City of Del Rey Oaks
John Longley, City of Marina
Fred Meuer, City of Monterey
Tim Brown, City of Seaside

\\afco\foeir.doc



□ CITY LIMIT BOUNDARY
 ■ SPHERE OF INFLUENCE
 ADOPTED - MAR. 22, 1983

CITIES

MONTEREY



330-3

MONTEREY COUNTY

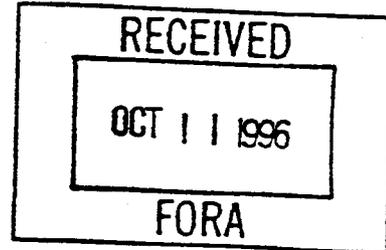
PLANNING AND BUILDING INSPECTION DEPARTMENT

P.O. BOX 1208 SALINAS, CALIFORNIA 93902 (408) 755-5025



ROBERT SLIMMON, JR.
DIRECTOR OF PLANNING AND BUILDING INSPECTION

October 11, 1996



Les White
Executive Director
Fort Ord Reuse Authority
100 12th Street
Marina, CA 93933

Dear Les:

This letter confirms that the Monterey County Board of Supervisors did, on October 1, 1996, formally act to transmit comments to the Fort Ord Reuse Authority (FORA) regarding your agency's Draft Environmental Impact Report (DEIR) on the Fort Ord Reuse Plan. Those comments were previously transmitted to you in the form of a report to the Board of Supervisors, also dated October 1. Another copy is attached.

Also attached is a revision to the Department of Public Works' comments which was prepared after the Board hearing. It reflects comments of Board members regarding transportation planning and funding.

Please call Veronica Ferguson or me if you have questions about the comments or the Board's action.

Sincerely,

William L. Phillips, AICP
Assistant Director

Attachments

cc: V. Ferguson
G. Gromko

331-1

REVISED

Report to Monterey County Board of Supervisors

SUBJECT MONTEREY COUNTY COMMENT ON THE DRAFT FORT ORD BASE REUSE PLAN AND DRAFT ENVIRONMENTAL IMPACT REPORT	BOARD MEETING DATE 10/1/96 10:45 AM	AGENDA NUMBER
RECOMMENDATION: APPROVAL		
DEPARTMENT PLANNING AND BUILDING INSPECTION		

RECOMMENDATION

Staff recommends that the Board of Supervisors transmit comments to the Fort Ord Reuse Authority (FORA) for consideration in adoption of its Fort Ord Reuse Plan Draft Environmental Impact Report (DEIR) and related documents.

SUMMARY

A Draft Fort Ord Reuse Plan (Volume One, Context and Framework; Volume Two, Reuse Plan Elements; and Volume Three, Business and Operations Plan), and the Reuse Plan DEIR, were circulated for review beginning on May 31, 1996. The deadline for comments is October 11, 1996. Several County departments have participated in Fort Ord base reuse planning and have prepared comments (attached) for the Board's review and transmittal to FORA.

DISCUSSION

Several County Departments have prepared comments on the DEIR and Reuse Plan. Highlights were orally presented at the Board's August 27, 1996 meeting. The more detailed, written comments recommended for transmittal to FORA are attached as Exhibits "A" through "E."

At the Board's August 27 meeting, County staff offered to return with remarks on three additional developing issues:

1. The proposed Federal Listing of several plants and one reptile as endangered species. On August 27, the U.S. Fish and Wildlife Service (the Service) was awaiting closure of a public comment period on their proposal to list several plant and one reptile species as threatened or endangered. Numerous citizens, the Pebble Beach Company, FORA, the City of Marina, and Monterey County, among others, testified in opposition to a listing decision at this time. Primary reasons cited were the Service's use of out of date and questionably scientific information, its failure to recognize more current information, and its apparent failure to account for the significant effort of its own staff in development of the Habitat Management Plan for Fort Ord.

It is likely that the volume, range and specificity of the oral and written testimony contributed to the Service's decision to postpone a listing decision until late Spring of 1997. (The Service's decision, Supervisor Johnsen's letter, and Planning and Building Inspection's letter are attached as Exhibits "F", "G", and "H".)

2. The pros and cons of limiting the FORA Reuse Plan to a 20 year (2015) time horizon. FORA and member agency staff, as well as citizens and groups offering comments on the Reuse Plan have been scrutinizing the capacity of fiscal and natural resources to actually build out the FORA Plan as currently proposed. One possible solution would simply shorten the time frame of the Plan, thus avoiding consideration of longer term development implications. County staff is very cognizant of immediate and long range resource constraints, but believes that the full Fort Ord buildout potential should remain a consideration for long range planning reasons. In any case, a recommendation/decision on the appropriate planning period is premature pending completion of the FORA environmental review process.

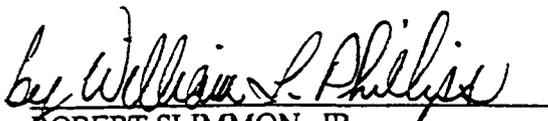
3. The appropriate means for Monterey County to use in amending its own plans to implement the FORA Reuse Plan. The FORA reuse planning process was originally expected to result in a plan with parts which could be simply adopted by local governments. Instead, the FORA plan and environmental documentation has become increasingly general. The FORA product will need substantial work to be incorporated into the County's more detailed General and Greater Monterey Peninsula Area Plans. In addition, the nature of public comments to date on the FORA DEIR indicate that each local government will have more work than previously thought as they attempt to bring their local planning documents into conformity with the FORA plan. The best avenue for Monterey County to take in pursuit of its own plans must await further work by FORA.

OTHER AGENCY INVOLVEMENT

Environmental Health, Parks, Public Works, Sheriff, and Water Resources have contributed comments on FORA's DEIR and Reuse Plan.

FINANCING

Comments regarding implications for financing are attached.


 ROBERT SLIMMON, JR.
 DIRECTOR OF PLANNING AND
 BUILDING INSPECTION
 SEPTEMBER 25, 1996

Report Prepared by William L. Phillips, Assistant Director.

- Attachments:
- Exhibit "A" - Memorandum from Environmental Health Division
 - Exhibit "B" - Memorandum from Parks Department
 - Exhibit "C" - Memorandum from Public Works Department
 - Exhibit "D" - Memorandum from Water Resources Agency
 - Exhibit "E" - Memorandum from Planning & Building Inspection Department
 - Exhibit "F" - Letter from U.S. Fish & Wildlife Service
 - Exhibit "G" - Letter from Supervisor Johnsen
 - Exhibit "H" - Letter from Planning & Building Inspection

cc: Clerk to Board (16); County Counsel; Public Works Dept.; Water Resources Agency; Parks Dept.; Sheriff; Environmental Health; Health Dept.; Veronica Ferguson - IGA; Les White

MONTEREY COUNTY



DEPARTMENT OF HEALTH ROBERT J. MELTON, M.D., M.P.H., Director

FAMILY AND COMMUNITY HEALTH ENVIRONMENTAL HEALTH HEALTH PROMOTION
MENTAL HEALTH ALCOHOL AND DRUG PROGRAMS EMERGENCY MEDICAL SERVICES

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- ☐ 1200 AGUAJITO ROAD, MONTEREY, CALIFORNIA 93940-4998 (408) 647-7800
- ☐ 1180 BROADWAY, KING CITY, CALIFORNIA 93930 (408) 385-8200

PLEASE REPLY TO ADDRESS CHECKED

MEMORANDUM

Date: August 26, 1996

TO: Robert Slimmon Jr, Director Planning and Building
Inspection Department
FROM: Walter Wong, Director, Division of Environmental Health
SUBJECT: Comments for Public Review Drafts Fort Ord Reuse Plan and
EIR

This Department has had the opportunity to review the Drafts of both the Reuse Plan and the EIR and offer the following comments:

WATER ISSUES

1. Impact Analysis: Need for New Local Water Supplies, pp. 4-42, 43 and 44. The EIR correctly identifies that a significant amount of additional water will be needed before full build-out can occur. However, it is assumed in the EIR that one or more of the four additional water supplies proposed are both feasible and reasonable.

The EIR and The Proposed Plan needs to clarify the manner in which water will be made available to the areas planned for development within Fort Ord. Sources of water supply and delivery should be identified and provision of such should be guaranteed prior to approval of development. Potential alternate supplies of water should be described and prioritized in some rational and explained manner. The EIR should identify environmental issues and potential constraints that can be identified at this time relating to the delivery of water from each potential source of water.

2. Water Policy B-1, p. 4-43 (EIR) and Sec 4.4.2. (Plan). As worded, this policy could be interpreted to mean that the jurisdictions are required to make water available for "areas" that would not have a water supply. It is not clear which policy has priority; preventing further seawater intrusion or ensuring water to deficient areas. In addition it is recommended that, "critically deficient areas" and "assured long term water supply" be defined in the EIR or, at a minimum, prior to adoption of the Plan.

331-4

EXHIBIT "A"

NOISE ISSUES

The following are general comments that apply to sections 3.4.2, Table 3.4-1 and Figures 3.3-1 and 3.3-2 of the Reuse Plan; and Section 4.9 of the EIR.

3. Potential Land Use Incompatibility from Noise. Typically when this Department receives noise complaints, they are situations where historical growth patterns have resulted in residential uses next to major roadways, or commercial/industrial uses. If noise was the only design criteria for the Reuse Plan, the land uses would ideally trend from the highway, to industrial uses, to commercial uses, to offices, to high density residential, to low density residential. This approach would essentially build noise mitigation into the Plan at a zoning level.

It is acknowledged that this type of planning will not be possible in all situations, however ~~when ever feasible this approach should be incorporated.~~ The Plan should be reviewed for possible conflicts with residential uses and areas that may require site specific planning should be noted. For example, offices could be used to buffer homes from industrial noise. Strips of office and/or light commercial uses along roads could buffer residences from traffic noise and take advantage of road access to attract businesses. Strips of open space/greenbelts/golf courses should also be considered between potentially incompatible uses. More specific examples are given below which could perhaps be listed as examples for a new Noise Program B-1.2;

- A. That strips of office space be used to buffer homes from industrial uses.
- B. Since almost all industrial applications need an associated office, perhaps the office portion should be required to be oriented towards the residences to act as a buffer.
- C. That the industrial uses be designed to be made more of a true and separated "industrial park".
- D. That parking areas be used as additional buffer so that the actual distance between the industrial/commercial noise source and the homes shall be maximized, i.e. a "campus" layout.
- E. Specifically state in the Plan that additional noise studies shall be completed at the time of industrial development proposals to determine consistency with any surrounding residential uses.
- F. That reservoirs, effluent storage, etc., be required to be located between potentially incompatible uses to increase the distances to receptors.
- G. That within the industrial zoning areas, "heavier" industrial uses shall specifically be required to be located farther away from any residential uses. The "lighter" industrial uses can then act as a partial buffer to residential uses. A similar requirement for commercial uses could be required.

The above comments are based upon the various sections in the General Plan that relate to planning mixed uses and are listed here for reference:

- Noise Hazards, Land Use Planning Implications, p. 84
- General Land Use Policy 26.1.5, 331-5
- Residential Policy 27.3.1,

-Industrial Policies 29.1.2, 29.1.4, 29.3.1, and 29.3.4,
-Goal 22 (Noise Element) and all associated objectives and policies.

4. Noise Element, Programs A-1.1 and A-1.2. When successfully implemented by the County in the past, the criteria proposed in Table 4.9-2 have been very useful in setting an upper limit on how loud an adjacent land use can be. Based on our experience with these criteria we would recommend the following modifications be made to aid implementation:

- A. The upper limit of the Range II noise category for all residential uses should be 65 dB and not 70 dB to be more consistent with other jurisdictions' standards, 5
- B. Both Tables 4.9-2 and 4.9-6 should specify that they are applicable at the receiving-zoning-property line. 6
- C. The levels in Table 4.9-2 are based on 24 hour averages, which means that some noise sources could be very loud and bothersome for shorter periods of time yet still technically meet the average standard. Therefore Table 4.9-6 is appropriate. However it appears that Table 4.9-2 and Table 4.9-6 are potentially inconsistent. For example a noise source that was 69 dB for 2 minutes of every hour would be consistent for residential uses per Table 4.9-2 but not Table 4.9-6. It appears that the criteria in Table 4.9-6 is too restrictive by 5 dB in most of the categories (especially in the day-time column). 7

HAZARDOUS MATERIALS/SOLID WASTE ISSUES 8

5. Fort Ord Reuse Plan, page 1-9, Environmental Remediation: There needs to be a discussion regarding the Army's long term responsibility for cleanup if additional contamination is discovered, that is related to the Army's activity, after the transfer of the property.

6. Fort Ord Reuse Plan, page 3-37, Marina Municipal Airport: With the expansion of the airport, and the use of turbo jet aircraft, the relationship of the airport and the adjacent Monterey Regional Waste Management District Landfill and the potential problem with birds needs to be addressed. 9

7. Fort Ord Reuse Plan, page 3-38, BLM Land Management: States that the BLM will control access to a limited area within the impact zone to isolate areas where unexploded ordinance will not be removed. It is this departments understanding, that the impact area will eventually be surveyed and ordinance will be removed. This may occur over the next 10 - 20 years depending on the propose use of this property. 10

8. Fort Ord Reuse Plan, page 3-83: Discusses the propose equestrian center on the former landfill site. If the site is to be developed, Title 14 Section 17796, Post Closure Land Use, would require extensive modification to the property prior to development. Concerns regarding landfill settling, soil stability, 11

and methane gas migration would have to be addressed. The refuse material would most likely have to be removed prior to development depending on the propose development.

9. Fort Ord Reuse Plan, page 3-134, Projected Land Uses for the Former Landfill: This section discusses the potential development of a golf course, a region-serving equestrian center and a retail convenience center for up to 10,980 sq. ft. on the former landfill site. See comment on # 8.

10. Fort Ord Reuse Plan DEIR, page 2-23, table 2.5-1 Long Term Exposure to Unexploded Ordinance: The level of significance before mitigation is listed as less than significant. This appears to be incorrect and mitigation measures are listed as none required which also appears to be incorrect. Unexploded ordinance do pose a significant problem if long-term exposure is allowed. Mitigation measures should be listed as fencing and posting-the area at a minimum.

11. Fort Ord Reuse Plan DEIR, page 4-16, Impact: Incompatibility Between Equestrian Center and Public Amphitheater Adjacent to Residential Area and University Park: This section again discusses the propose development on the former landfill site. See comment # 8.

12. Fort Ord Reuse Plan DEIR, page 4-36, Solid Waste: Solid Waste generated at the former Fort Ord is estimated to have been approximately 94 tons per day. This waste was disposed of at the Monterey Regional Waste Management District's landfill. There needs to be a discussion of the ultimate build out of the former Fort Ord and the approximate amount of solid waste that will be generated, the recycling programs that will be mandated, and the effect this will have on the site life of the Monterey Regional Waste Management district's landfill.

13. Fort Ord Reuse Plan DEIR, page 4-39, Assembly Bill 939: This bill mandates the reduction of solid waste disposal by 25% by the year 1995 and 50 % by the year 2000 not a 5.4 pounds per person per day target rate for solid waste generation as discussed in this section. Also, AS 939 should be read-AB 939.

14. Fort Ord Reuse Plan DEIR, page 4-51 (5) Impact: Degradation of Water Quality from Potential Hazardous Materials spills During Construction: This section recommends that the city shall adopt and enforce a hazardous substance control ordinance that requires that hazardous substance control plans be prepared. This should read the County shall adopt, because the county is the administering agency for the County and all of incorporated cities for the hazardous materials/hazardous waste program. This would be a duplication of duties if the city were to adopt such an ordinance. This same language is also found on page 4-63.

15. Fort Ord Reuse Plan DEIR, page 4-62, Safety Element: Throughout the document, there is mentioned that the city/county shall monitor and report to the public all progress made on the remedial action record of agreement(RA-ROD) which includes, 1. review of the RA-ROD implementation progress and maintain a public record of property locations which contain hazardous materials.

31-1

including a timetable for and the extent of remediation to be expected, 2. report to the public the Army's compliance with all of the federal Environmental Protection Agency's rules and regulations governing munitions waste remediation including treatment, storage, transportation, and disposal. This appears to be a responsibility of the Army and US EPA not the county and the cities. The Army should provide progress reports regarding the implementation of the RA-ROD and US EPA should report to the county and the cities regarding the Army's compliance of the federal Environmental Protection Agency's rules and regulations. This language appears on page 4-60, 4-61, 4-62, 4-63, 4-64.

18

Thank you for the opportunity to comment and we look forward to reviewing the next version of the documents.

Walter Wong
Walter Wong, M.P.H., R.E.H.S.
Director, Division of Environmental Health

cc: Jon Jennings, Chief, Hazardous Materials/Solid Waste Branch
Mary Anne Dennis, Chief, Resource Protection Branch
Mark Dias, Division of Environmental Health, Land Use
Bill Phillips, Assistant Director of Planning and Building
Inspection

WW/jjmd/FT-ORDI.MEM

MEMORANDUM

FROM THE DESK OF
RICHARD BRANDAU, PARK PLANNER
MONTEREY COUNTY PARKS DEPARTMENT
TELEPHONE: (408) 755-4911 - FAX: (408) 755-4914

B

TO: Robert Slimmon Jr., Director, Planning and Building
Inspection
DATE: August 8, 1996
SUBJECT: Review of Fort Ord Base Reuse Plan and EIR, Related
Documents

Staff has taken the opportunity to review pertinent sections of the above referenced environmental documents as they relate to former Fort Ord lands that are to be transferred to the County for park and recreation purposes. Following staff comments on the EIR, I have provided a brief update on the status of the transfer process for the park parcels.

After reviewing these documents from our perspective, I see no basic change in Reuse Plan objectives that would have any major policy implications for the Board of Supervisors to evaluate on our behalf. However, there are several issues that I would like to bring to your attention with regard to information contained in the EIR. Taken in that context, these comments may have some bearing on the Board's overall evaluation of the Draft EIR.

Reference: Proposed Trail Network, page 3-90, Volume 1-Context and Framework

Comments: The four page discussion on the proposed Fort Ord trail network does not address the potential public trail benefits that exist by connecting the Fort Ord trails with the Toro Park and Carmel Valley areas. Staff acknowledges that trail issues in these areas are outside the scope of this EIR. However, a mention of this possibility could well provide local trail users with the impetus toward establishing a valuable link in the long sought after countywide trail system.

19

Reference: Draft Environmental Impact Report-Basewide Distribution of Utility Systems

Comments: The RV Travel Camp/Youth Camp will require, at minimum, upgraded utility service connections for telephone, gas and electric and water supply for programmatic purposes. In any discussions relating to these issues, the Board should be aware of the needs of the Youth Camp and provisions for these utilities should be included in subsequent agreements with either current or future utility service providers.

20

331-9

EXHIBIT "B"

Reference: Draft Environmental Impact Report-Traffic and Circulation
Comments: While this section primarily discusses traffic and circulation issues on a more regional level, there is a traffic and circulation issue that is of prime importance to this department and needs to be restated once again. Vehicular access to both South Boundary Road (via North-South Road) and Barloy Canyon Road (via the East Garrison Area) is critical in reducing the traffic impact on Highway 68 during major racing and special event activities held at Laguna Seca Recreation Area. Hopefully, this issue will be included in any subsequent discussions relating to new traffic and circulation routes.

21

Reference: Draft EIR-Biological Resources Policies A-3, A-4 and A-5
Comments will be limited to only those Biological Resource Policy Programs that are of concern to the Parks Department.

Program A-3.1, page 4-132

1) While staff is in general agreement with having the USFWS and CDFG review any expansion plans for the existing campground, we do not think it is necessary to get their approval. A Program of Utilization which details the use of the facility has been previously submitted to the National Park Service for approval. The final transfer document executed by the County and NPS will require all expansion efforts to be consistent with the Habitat Management Plan (HMP). Additionally, any structural improvement projects or change in permitted use must get clearance from the County Planning and Building Department.

22

Program A-3.5, page 4-132

2) Staff is aware of and agrees to the habitat management practices required for the natural lands in the RV parcel. However, the requirement for a separate survey for the Monterey Shrew represents an unknown and unanticipated cost for the County.

23

Program A-4.1, page 4-133

3) Staff has no prior knowledge of a Community Park in the vicinity of the Youth Camp and therefore cannot comment on its relationship to the Youth Camp nor to the statement that the County shall design such a facility.

24

Reference: Figure 3.6.2 - Draft Habitat Management Framework

Comment: This Figure shows a possible inconsistency in describing various management areas. Polygon 30a is described as a HMP Reserve and/or Corridor. Staff feels this parcel should be delineated in the same manner as Polygon 30b and 30c and therefore designated as a HMP Conservation and/or Management Requirements Area, or whichever designation allows the Parks Department to use the property in the manner requested.

25

This concludes staff comments on the above documents. Once again, I don't see any major policy implications for the Board to evaluate with respect to the Parks Department. Please feel free to use any or all comments in this memo as you see fit.

PARK PROPERTY TRANSFER UPDATE

As you know, the County Parks Department has requested and is pursuing the acquisition of approximately 1,013 acres of former Fort Ord land under the Public Discount Conveyance Program. Recently, staff succeeded in obtaining the use of 5.9 acres of a portion of Wolf Hill for purposes of extending the Laguna Seca Racetrack. This project was successfully completed in mid-December 1995 and the property transferred to the County under a short-term lease with the Army.

Additionally, four parcels totaling 613 acres were surveyed. These areas are 1) Wolf Hill (79 acres), 2) Lookout ridge (196 acres), 3) Oil Well Road Parcel (65 acres), 4) a 247 acre parcel fronting Highway 68 and 5) portions of South Boundary and Barloy Canyon Roads (24 acres). The existing RV Travel Camp (Youth Camp) has not been surveyed due to the ongoing conflicts associated with the East Garrison Planning District. However, the preliminary estimate for the Youth Camp is 400 acres.

The transfer process begins with the preparation of the transfer documents by the Army and subsequent assignment of the property to the National Park Service (NPS) for further and final disposition. The actual transfer of selected parcels by grant deed will occur sometime in the summer or fall of 1997, barring any last minute reservations by the County, Army or National Park Service. The Corps of Engineers indicated that the transfer process for the park parcels will most likely be done in the following two phases. Rest assure that this scenario can and most likely, will change several times before we have the deeds in hand.

Phase One: Transfer Documents Completed by March of 1997.

- Lookout Ridge Parcel (main portion)
- Oil Well Road Parcel
- Highway 68 Parcel
- Wolf Hill Parcel (5+ acres)

Phase Two: Final Transfer Documentation Completion Date Unknown

- Lookout Ridge Parcel (remainder portion)
- Wolf Hill Parcel (73+ acres)
- Youth Camp

Thank you.

cc: Bill Phillips, Asst. Planning and Building Director

WKS/MEMOS/PHILIPS/REUSEPLAN-2IR REVIEW

DEPARTMENT OF PUBLIC WORKS
COUNTY OF MONTEREY

MEMORANDUM

TO: Robert Slimmon Jr., Director, Planning and Building Inspection
FROM: Gerald J. Gromko, PhD, PE, Public Works Director
SUBJECT: REVIEW OF DRAFT FORT ORD BASE REUSE PLAN AND DEIR (Rev 1)
DATE: August 27, 1996

This is in response to your July 25, 1996 memo requesting this Department's review of the subject documents.

The DEIR repeatedly emphasizes that the development of the Fort Ord Base Reuse Plan will have "Significant" and "Unavoidable" impacts on the regional transportation system in Monterey County. The document further repeatedly emphasizes that the most important mitigation of such impacts will be a commitment by FORA and the local land use agencies to participating in the funding programs necessary to pay for Fort Ord's share of impact on that system.

Specific Transportation Mitigations and Costs not Identified. The DEIR does not appear to provide policy direction regarding the specific roads which must be upgraded to accommodate the proposed development, nor does the DEIR specify how much of the cost of these projects will be paid by Fort Ord. Table 4.7-2 provides a list of transportation improvements which must be accomplished to address deficiencies created by Fort Ord development plus cumulative impacts (column headed "Optimistically Financed"). However, the total cost of these projects and the Fort Ord contribution are not identified, nor are these projects included in the list of required mitigations. It is necessary that the *Summary Table of Proposed Project Impacts and Mitigation Monitoring Plan* (Table 2.5-1) be modified to include the list of projects, costs and timetable provided in the FORA *Public Facilities Implementation Plan* (PFIP), which has been labeled as a "Deliverable Associated with the Operations Plan Component of the Fort Ord Base Reuse Plan". Inclusion of these projects and costs in this table would guarantee Fort Ord development would be required to contribute its fair share of the mitigations required by the development that occurs on Fort Ord. 210

Commitment to Additional Funding for Transportation System Mitigations. The County's endorsement of FORA's adoption of the Base Reuse Plan and the approval of the EIR must carry with it not only the County's continuing commitment to developing and participating in funding programs for County-wide as well as Fort Ord-related transportation mitigations, but its continuing commitment to urging FORA and the other Fort Ord land use agencies, including CSUMB and UCSC, to participate in them as well. The DEIR and related studies conducted by FORA and TAMC clearly indicate that unless these impacts on the regional transportation system are mitigated, it is unlikely the redevelopment of Fort Ord as envisioned in the Base Reuse Plan can be accomplished. The DEIR clearly states that establishment of new local funding programs for the improvement of the regional transportation system is critical to the success of the FORA plan for the economic rejuvenation of the Fort Ord area. 27

MONTEREY COUNTY

WATER RESOURCES AGENCY



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TELEFAX (408) 424-7935

MICHAEL D. ARMSTRONG
GENERAL MANAGER

MAILING ADDRESS
PO BOX 930
SALINAS, CA 93902-0930

DATE: September 20, 1996

MEMORANDUM TO: Brian Foucht, Senior Planner
Monterey County Planning and Building Inspection Department

FROM: Matthew Zidar, Principal Hydrologist

SUBJECT: Final Comments for County Interagency Review: Public Draft
Environmental Impact Report, Fort Ord Reuse Plan

The Monterey County Water Resources Agency has reviewed the Public Draft Environmental Impact Report, Fort Ord Reuse Plan. This letter is to present the Agency's final comments. This letter replaces the preliminary comment letter submitted by the Agency, dated August 12, 1996.

28

General Comments:

1. The Draft EIR does not adequately address the significant impacts and cumulative effects to the water supply of the Salinas Valley. The Fort Ord annexation agreement between the MCWRA and the U.S. Army allows for 6,600 acre feet of water per year until a new source of water is provided. The Draft EIR states that the proposed project will use 18,262 acre feet of water per year at build out. The proposed project is expected to reach the 6,600 acre feet annual cap by the end of the first phase of development, around the year 2015. No further development can continue after this date until a new source of water is found. The Draft EIR should provide more detailed descriptions of the potential alternatives for obtaining new sources of water.
2. Since the significant impacts associated with developing water supplies required at build out are not recognized, the policies for water development and the mitigation monitoring plan do not adequately reduce the water supply significant impacts to levels less than significant.
3. The Draft EIR and Reuse Plan do not provide enough detail related to the allocation of current or proposed future water supplies. The EIR and Reuse Plan should contain a discussion regarding potential distribution of the 6,600 acre feet which is available to the Fort Ord planning area, and which specific areas of the Reuse Plan would be served by the initial 6,600 acre feet.
4. The Monterey County Water Resources Agency recommends that a policy requiring a Water Allocation Plan be included in the Reuse Plan, and that the Agency should be listed as a responsible

331-13

EXHIBIT "D"

agency for reviewing and approving the plan. The Water Allocation Plan should describe current and proposed future water use, and the process for allocating water to the jurisdictions within the Fort Ord planning area. The Water Allocation Plan should discuss the initial 6,600 acre feet allotment, future water supplies if and when they are developed, and potable as well as non-potable water sources.

5. To ensure the Fort Ord annexation agreement and the 6,600 acre feet allotment is enforceable, the Reuse Plan should reflect a requirement for the Fort Ord area water purveyor(s) to submit annual water production and sales reports to the Monterey County Water Resources Agency, by February 15th for the prior calendar year.
6. The Draft EIR acknowledges problems related to erosion and sediment loading in streams. This has been a problem particularly in El Toro Creek, impacting the flood flow capacity of the creek. The EIR calls for City/County policies and programs to address storm water control issues. It is recommended that a policy requiring a Master Drainage Plan be included, and that this also be reflected in the mitigation monitoring plan. The Monterey County Water Resources Agency should be listed as a responsible agency for reviewing and approving the plan, as the Agency has County-wide responsibility regarding regional drainage issues. A master Drainage Plan must be developed and should assess the adequacy of existing drainage facilities, recommend improvements, and develop plans for the control of storm water runoff from future development (including detention/retention and enhanced percolation to the ground water). Best management practices that address both quantity and quality of runoff could be included in the Plan. This comprehensive approach would be preferable to piecemeal solutions as development occurs.
7. The EIR should describe how future projects will be evaluated, and define the level of environmental review which will be required as future phases are developed and specific projects are proposed.

Specific Comments

1. Page 2-3 middle paragraph. The effects of the proposed reuse project on hydrology and water quality are listed as less than significant. They should be listed as potentially significant unless actually mitigated. Several places throughout the document suggest that the project could increase erosion and sediment loading in streams, as well as water quality degradation by pollutants in runoff from increased impervious surfaces. Any discussion of hydrology and water quality anywhere in the report should be changed to potentially significant.
2. Section 4.4 -2 Page 2-20. The mitigation measure is lacking the commitment that a new local source of water will be found. Developing and adopting a storm water detention plan does not assure a new source of water. The level of significance should be changed to significant as is stated in the first bullet on page 2-4.
3. Page 4-40 Table 4.2-1. It is unclear if the last row represents the amount of acres where water lines distribute water or if the figures shown represent the amount of water distributed. This is further

confused by the line in the key that defines afy as acre feet per year. If the table is showing acres of land than the afy line in the key should be eliminated.

4. Page 4-42, 4th and 5th paragraph. The text suggests that 3,330 acre feet/year could be supplied from reclaimed water. What is the source of the reclaimed water? If it is assumed to be provided by the Monterey Regional Water Pollution Control Agency, the Control Agency's capacity and its commitments to the Marina Coast Water District and to the Salinas Valley Reclamation Project should be considered. 34

The last part of the 4th paragraph and paragraph 5, discusses other water supply sources such as on-site recharge ponds and storage facilities. Recharge ponds and storage facilities by themselves are not alternative sources of water. The water to fill the recharge ponds and storage sites has to come from somewhere. This paragraph should include the discussion of suggested sources of water to be stored or recharged, including storm water. 35

5. Page 4-43, last paragraph and page 4-44. The increased demand for water at the proposed project build-out will be a significant impact no matter what new source of water is found. Each suggested source of water will have its own inherent impacts and these impacts will need to be addressed as each alternative is investigated. This is consistent with the discussion on page 2-3 under significant impacts which would be unavoidable. 36

6. Page 5-4 and 5-6, Section 5.1.4. As discussed in Number 5 above, the cumulative impact at build-out attributed to the reuse of Fort Ord should be considered a significant impact until such time as a new water source is established. The text in the first paragraph should be changed to be consistent with the last paragraph in this section. 37

The first sentence of the second paragraph on page 5-5 suggests that policies and programs in the Conservation Element would reduce the cumulative impacts on the ground water aquifers. Agency Staff could not find these policies. The policies and programs should be quoted here so that the reader does not have to consult another reference. This paragraph once again, suggests that on site storage is a new water source. This discussion needs to be changed to reflect the source of the water to be stored. The last sentence should be changed to read, "with Monterey County Water Resources Agency (MCWRA)."
38

cc: Michael Armstrong, MCWRA
Robert Slimmon Jr., Planning and Building Inspection
Walter Wong, Environmental Health
Margo Nottenkamper, MCWRA
Allen Mulholland, MCWRA
Owen Stewart, MCWRA



MONTEREY COUNTY
PLANNING AND BUILDING
INSPECTION DEPARTMENT

MEMORANDUM

TO: Veronica Ferguson, Assistant CAO, Intergovernmental Affairs

FROM: William L. Phillips, Assistant Director 

SUBJECT: Review of Draft Fort Ord Base Reuse Plan and DEIR

DATE: September 25, 1996

Our department has reviewed comments of other County departments as well as those of the public and other agencies submitted to the Fort Ord Reuse Authority to date. We do not believe it is necessary to repeat comments covered in many cases in great detail in those other responses. Accordingly, the remarks in this memorandum are limited to matters which our department thinks are not sufficiently dealt with by other departments, agencies or the public so far.

39

1. The Reuse Plan Land Use Element (Section 4.1) calls for the preparation of land use and design plans at several levels, including Specific Plans for residential, commercial and industrial areas, area wide cooperative plans centered on key institutional or visitor serving development areas, and prototypical design plans for key land uses such as mixed use areas, transportation corridors, open space linkages and parks.

This represents an extensive series of comprehensive land use and design plans. For example, by law Specific Plans are required to contain:

- Distribution, location and extent of the uses of land;
- Proposed distribution, location, extent, and intensity of infrastructure;
- Standards and criteria for development and for the conservation of resources;
- A detailed program of implementation measures, including financing.

The reuse plan should suggest a strategy for the preparation of these plans, consistent with overall Base Reuse Plan goals. An ongoing, formal commitment to this strategy by Monterey County and other participating jurisdictions will be necessary so that each implementing plan contributes to the success of Base Reuse Plan policies and programs. Similarly, commitment by FORA members to a long term funding strategy will provide ✓

331-16

the needed basis for financing programs for each area for which a specific plan will be prepared. "Context and Framework" (Volume 1) and "Business and Operations Plan" (Volume 3) portions of the Base Reuse Plan should be expanded accordingly.

2. Monterey County may adopt and rely upon the Reuse Plan as its general plan for land within the former territory of Fort Ord. An amendment to the Greater Monterey Peninsula Area Plan will be necessary for this purpose. Two amendment options are available:

- A) Remove reference within the Greater Monterey Peninsula Area Plan to the former military reservation. The Base Reuse Plan would then be adopted as a discreet planning unit (e.g. Fort Ord Area Plan) separate from the other portions of the Greater Monterey Peninsula; or
- B) Rewrite (amend) the Greater Monterey Peninsula Area Plan to incorporate planning policies and programs contained in the Reuse Plan.

The second option is recommended in order to provide a relatively better context for planning and design of land uses and infrastructure along with other FORA local jurisdictions, all of which are currently referenced within the Greater Monterey Peninsula Planning Area. A particular proposal for amendment should wait for completion of the FORA environmental review process.

3. The DEIR does not deal sufficiently with possible mitigations for the significant effects on County public safety and law enforcement. The FORA plan should first be more specific in identifying the MOUT/POST facility as a multi-agency law enforcement training facility to clearly state what has been FORA's intention all along. Second, because the DEIR points out that lack of secured funding results in a significant and unavoidable impact, the description of potential mitigation measures should be broadened.

One such measure could be extension of infrastructure, especially water and sewage disposal, to the MOUT/POST site to enhance its viability as a law enforcement center. It should be noted that the unincorporated Monterey County area of Fort Ord will become open to public use, in contrast to its former status as a closed military installation, and that the bulk of new residential areas in the FORA plan occur in the center of the post where there are currently no law enforcement facilities.

BP:BF

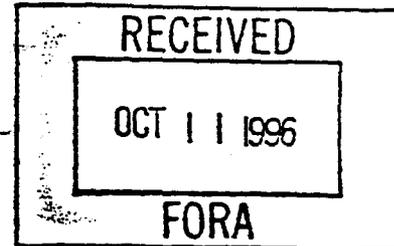
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October 11, 1996

Mr. Les White, Executive Officer
Fort Ord Reuse Authority
100 12th Street, Building 2880
Marina, CA 93933

Subject: COMMENTS RE FORT ORD REUSE PLAN AND DEIR

Dear Mr. White:

Thank you for the opportunity to review the draft Fort Ord Reuse Plan (the Plan) and related draft Environmental Impact Report (DEIR). Our City Council discussed the Plan and DEIR and offers the following comments in the spirit of contributing to the development of a Reuse Plan for Fort Ord that will be of benefit to all communities of the Monterey Bay region.

UNDERLYING ASSUMPTIONS AND PREMISES

At the outset, we would like to draw the reader's attention to the following underlying assumptions and premises that our City Council used in reviewing the Plan and DEIR and in developing Pacific Grove's comments:

- The environment and economy of the Monterey Bay region are interdependent and integrally interrelated.
- Large scale development of Fort Ord will have impacts on the environment and economy of the entire Monterey Bay region.
- The jurisdictions containing Fort Ord within their boundaries have legitimate economic and social goals in which the development of Fort Ord is critical.
- Pacific Grove has a stake in the scope and type of development that will occur at Fort Ord because of the potential impacts on the city's quality of life and economy.
- It is possible to develop a Fort Ord Reuse Plan that will protect the legitimate interests of the jurisdictions within whose boundaries Fort Ord is located, the City of Pacific Grove, and other jurisdictions within the Monterey Bay region.

We believe that it is possible to develop a Plan that will reflect a win-win situation for all FORA participants.

THE PLAN

Our overall conclusion regarding the Fort Ord Reuse Plan is that build-out in accordance with the proposed Plan will overwhelm the environment and infrastructure of the region, thereby reducing the quality of life and adversely affecting the environment and economy of the region with the greatest impacts being felt in the communities of the Monterey Peninsula and North Monterey County. In our opinion, the Plan should be revised to reflect a level of development and population consistent with the environmental, economic and fiscal constraints of the region.

332-1

We believe that quality economic development should be encouraged to insure sustaining and enhancing the region's resources. Quality development requires, among other things, design guidelines to ensure that regional view sheds and corridors are protected. Furthermore, infrastructure improvements must be phased to occur prior to or concurrently with development. Critical to achieving the latter is the need for a financing plan that will realistically provide a basis for developing a phased infrastructure improvement program. Such a financing plan will need to explore the need for regional impact fees in addition to those to be collected from development at Fort Ord.

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We believe the Plan must provide for an institutional framework that will foster an ongoing dialog involving all jurisdictions having a stake in the development of Fort Ord. Such a dialog needs to recognize the principle of "home rule" for the jurisdictions within whose boundaries Fort Ord lies, as well as the concept of regional planning. This means that in situations that do not involve regional impacts, deference must be given to the local decision-making bodies of the local jurisdiction. Likewise, the local jurisdiction must be willing to take into consideration the regional impacts of development occurring within Fort Ord. Thus, a regional view shed or corridor needs to be defined and treated differently from the development not impacting the regional view shed. Our position might be summarized in the phrase - Think regional, Act local.

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THE DEIR

An environmental impact report (EIR) is intended to be an attempt by a lead agency in good faith to fulfill its obligation under the California Environmental Quality Act (CEQA) to provide sufficient meaningful information regarding the types of activity and environmental effects that are reasonably foreseeable from the project being reviewed to enable the reader to understand (1) what the project is that is being reviewed, (2) what the anticipated significant adverse environmental impacts of the project are, (3) what mitigation measures can be applied to the project to reduce the anticipated impacts to less than significant, and (4) project alternatives that should be considered to minimize adverse environmental impacts.

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Most EIRs address a single project such as a housing project or roadway improvement, and thus can be tailored to be quite precise in their analysis. By its very nature, the Fort Ord Reuse Plan is a complex document and thus does not lend itself as easily to the type of analysis found in an EIR for a single project. For complex projects, such as base closure plans and general plans, a program or tiered EIR is often prepared. However, both the Public Resources Code and case law note that tiering is not an excuse for deferring analysis of policy-level impacts to second-tier documents. Second-tier documents are required to incorporate by reference the more general analysis of policy-level impacts. Thus, a balance needs to be struck that enables the reader of the DEIR to sufficiently understand the elements of the Plan, the anticipated related impacts, the mitigation measures, and plan alternatives being proposed to reduce any environmental impacts to less than significant.

Our overall conclusion regarding the DEIR is that although the DEIR references the significant impacts, it is deficient in clearly quantifying impacts, mitigation measures and financing for the mitigation measures. Consequently, key portions of the DEIR need to be rewritten and the DEIR recirculated. The following comments highlight issues pertaining to the DEIR of particular concern to Pacific Grove:

- **Assumptions regarding the housing/jobs balance.**

Because neither the Plan nor the DEIR include clear commitments to improving infrastructure to the levels needed to accommodate the density and intensity of proposed land uses, we question the underlying assumption in the Plan regarding the housing/jobs balance. If the infrastructure is not improved to the required levels, economic development will be adversely impacted. If economic development does not occur as projected, any developed housing is likely to be acquired not by persons living in Fort Ord or the Monterey Peninsula but

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by commuters to the Santa Clara Valley. This is analogous to the situation that occurred during the past decade in Modesto and Tracy.

- **Currency and availability of data used in the Plan and DEIR**
As noted in the several documents referenced below, certain key data appear outdated or missing. We ask that any such deficiencies be corrected in the revised DEIR.
- **Environmental Impacts**
The most notable deficiencies in identifying impacts are found in the sections of the DEIR pertaining to transportation, visual impacts, water, and economic/fiscal impacts.

Transportation

The most significant deficiencies in the DEIR are found in the sections pertaining to transportation. Aside from the deficiencies in quantifying anticipated impacts both in terms of projected traffic levels and LOS, the DEIR appears to overlook critical roadway segments literally adjacent to Fort Ord, e.g. Highway 1 in the vicinity of Fort Ord. In addition, we question certain assumptions about the availability of facilities at build-out, e.g. the assumption of the completion of the Hatton Canyon Freeway. However, even more problematic is the lack of clear commitment to funding needed transportation improvements to accommodate development at Fort Ord.

Visual Resources

The section on visual resources clearly takes steps to address the maintenance and enhancement of the visual qualities within Fort Ord. However, both the Plan and the DEIR need to be improved with respect to the visual impacts on the adjacent communities and the region. For example, lacking is an identification of critical regional view sheds and corridors, related impacts and concrete design review standards and guidelines. Suggested improvements include photomontages of key views with potential development superimposed to enable the reader to determine the significance of this impact as well as the development of design standards and development guidelines.

Water

The DEIR needs to be improved with respect to both the impacts associated with a 20 year time horizon, as well as the impacts of development beyond 2015. With respect to the 20 year horizon, it is common knowledge that water problems abound on the Monterey Peninsula. Nevertheless, the DEIR is lacking in its handling of the impacts on neighboring jurisdictions created by demand for water stemming from massive new water consumption development within Fort Ord. With respect to the post 2015 scenario, the DEIR states that the Plan would need one or more new-water supply projects. Yet, none of the new water supply projects are addressed in the DEIR. Finally, the issue of saltwater intrusion, an issue critical to the North County area as well as Fort Ord, is not adequately addressed. The cumulative impacts of saltwater intrusion on development in Fort Ord and North Monterey County need to be addressed in a clear and forthright manner. Moreover, the potential contribution of Fort Ord development to saltwater intrusion must also be addressed.

Economic/Fiscal

The impact of the Plan on the regional economy and related fiscal base needs to be expanded to address the impacts on other jurisdictions that will be affected by the projected build-out. A theme repeated in virtually each commentary on the Plan and DEIR is the lack of clear definition of fiscal impacts and more importantly the lack of commitment to funding the requisite infrastructure improvements. As noted in a recent AMBAG conference on the regional economy, the environment and economy of the Monterey Bay region are integrally interrelated. Thus, it is incumbent that the Plan and DEIR address the economic and fiscal impacts using a regional perspective.

Unfortunately, as noted in the Charles Long correspondence cited below, the Comprehensive Business Plan (CBP), the portion of the Plan intended to address the economic and fiscal impacts of projected development at Fort Ord, contains errors and inconsistencies. The figures contained in the CBP are critical to developing meaningful fiscal measures to pay for requisite infrastructure improvements and must be accurate and consistent.

• **Mitigation Measures**

Incorporated by reference in the documents listed below are comments regarding mitigation measures found in the above listed documents. In addition to the problem of inadequately identified mitigation measures is the critical issue of the apparent lack of commitment to implementing mitigation measures. There are too many "shoulds" and not enough "shalls". There is no trigger mechanism for infrastructure improvements. It is unclear who will carry out the mitigation monitoring requirement as required by State law. Furthermore, the DEIR should require that infrastructure improvements be provided prior to or concurrent with development. Likewise, development standards such as design standards and guidelines need to be addressed prior to the Plan being adopted and not afterwards lest they become perfunctory afterthoughts.

• **Project Alternatives**

It is recommended that in light of the significant environmental and economic impacts anticipated from build-out of the Plan, a reduced project alternative be considered. Such an alternative needs to include a level of density and intensity that can be served by infrastructure that can reasonably be assured to exist at the time any development is completed. It is recommended that the reduced project alternative be no greater than the project year 2015 population level including CSUMB students. We recommend that the population figures in the project alternative not exceed the equivalent number of persons that resided at Fort Ord at the time the latter was a military installation. In determining the population equivalent of the former Fort Ord soldiers, the consultants need to take into account the differences in patterns of behavior between soldiers and civilian households, e.g. the trip characteristics of single soldiers are significantly different from those of a household consisting of parents and children or persons working in Salinas or the Monterey Peninsula.

INCORPORATION OF OTHER DOCUMENTS BY REFERENCE

Pacific Grove's concerns about both the Plan and DEIR are shared by other agencies and individuals. The following documents and those referenced therein are incorporated by reference to support the City's conclusions regarding the Plan and the DEIR:

- Letters from AMBAG to Les White, FORA Executive Officer, commenting on the Plan and DEIR, dated August 14 and 20, 1996 respectively (Exhibit 1)
- Comments by the City of Monterey re the Plan and DEIR, dated August 21, 1996 (Exhibit 2)
- Letter from City of Carmel-by-the-Sea to Les White, FORA Executive Officer, re the Plan and DEIR, dated October 2, 1996 (Exhibit 3)
- Letter from Transportation Agency for Monterey County (TAMC) staff to Ann Heibenstreit, FORA Planner, commenting on the Plan and DEIR, dated September 4, 1996 (Exhibit 4)
- Comments of Fort Ord Reuse Plan and DEIR, a report by the League of Women Voters to the City Councils of the Cities of Carmel-by-the-Sea, Del Rey Oaks, Marina, Monterey, Pacific Grove, Sand City and Seaside, dated August 12, 1996 (Exhibit 5)
- Letter from the University of California, Santa Cruz to Leslie White, FORA Executive Officer titled Comments on Fort Ord Reuse Authority Reuse Plan and Business Operations Plan, dated August 20, 1996 (Exhibit 6)
- Letter from Charles Long to Allan Gatzke critiquing the Comprehensive Business Plan, dated July 17, 1996 (Exhibit 7)

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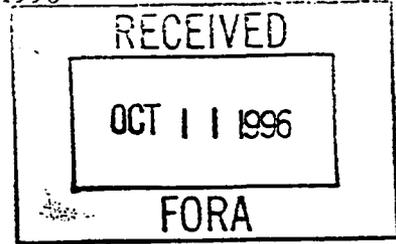


COMMUNITY PLANNING AND LAND DEVELOPMENT

SANTA CRUZ, CALIFORNIA 95064

October 11, 1996

Mr. Leslie White
Executive Officer
Fort Ord Reuse Authority
100 12th Street, Building 2650
Marina, California 93933



Re: Fort Ord Reuse Authority Reuse Plan Draft Environmental Impact Report

Dear Mr. White:

The University of California submits the following comments to the Fort Ord Reuse Authority (FORA) on the Fort Ord Reuse Plan Draft Environmental Impact Report. We recognize the hard work and effort by FORA, its member agencies, and its consultants in producing this document and associated planning reports. Our comments with respect to the Draft Environmental Impact Report (DEIR) are submitted prior to the deadline specified by FORA, and we anticipate responses will be incorporated into the Final Environmental Impact Report or other forthcoming CEQA documentation.

Summary of General Comments:

1. Program EIR: Public Resources Code §21083.8 provides significant CEQA advantages to reuse authorities who prepare EIRs on base reuse projects defined as "single projects;" agencies that approve subsequent plans and projects for reuse under a §21083.8 EIR receive similar benefits. The FORA DEIR is unclear with respect to whether it is a "single-project" EIR under §21083.8 or a standard "program-level" EIR. It may be that the intention is to permit the EIR to function as a §21083.8 EIR for general plan approvals and to require that all subsequent approvals be considered project-specific approvals under the program EIR. If that is the case, the EIR should be revised to consistently reflect this intention. Furthermore, the EIR should ensure that every topical analysis is adequate to support the use of the document as a §21083.8 EIR, and should clearly describe the mechanisms whereby the procedural requirements of §21083.8 were satisfied.

2. Setting, Base Year and Buildout Year(s): Setting sections should properly incorporate background documents by reference. Base years vary from topic to topic; a clear rationale for choice of base year should be provided for each topic. The full buildout year is not identified, but buildout conditions are referred to as occurring in 40 to 60 years. There is a lack of consistency across topics with respect to the extent of analysis provided for the period after 2015, with some topics lacking any analysis of full buildout (e.g., utilities, traffic and circulation, and air quality). If it is the intention of FORA to fully analyze impacts through buildout, analyses in topical sections should be strengthened to support conclusions with respect to buildout impacts. Alternatively, if it is not feasible to assess buildout impacts at this time, the EIR should state that it fully addresses impacts through 2015, and that analyses of project impacts beyond that year would be speculative.

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3. **Significance Criteria:** Typical CEQA significance criteria should be identified in every topic section. Moreover, there should be a precise correlation between the stated criteria and the impacts that are analyzed in the document (see the following topics for examples of sections that are not fully correlated: geology and soils, traffic and circulation, air quality, and biological resources). A failure to fully analyze all CEQA criteria results in analytical deficiencies in some sections; the document should be revised to include full analyses of all CEQA significance criteria. 5

4. **Impact Analyses:** For several topics, evidence does not seem to fully support a determination that impacts will be less-than-significant (e.g., land use, utilities, water supply, hydrology and water quality, public health and safety [i.e., seismic safety], air quality, and biological resources). Furthermore, some topics are not fully analyzed beyond the year 2015 (e.g., utilities), but no potentially significant impacts are identified for full buildout. In the absence of adequate evidence supporting conclusions that impacts will be less-than-significant, additional analysis should be required at the appropriate time (e.g., possibly in 2015, as described above), or potentially significant unavoidable impacts should be identified as significant and unavoidable. 6

5. **"Premitigation" via Reuse Plan Programs and Policies:** The DEIR relies heavily on the future drafting of mitigation programs by local jurisdictions, in conformance with very general policies and programs set forth in the Draft Fort Ord Reuse Plan. In some cases the Reuse Plan programs are no more than injunctions to solve problems at a future time, with little evidence provided that effective and feasible mitigations are actually available (e.g., geology and soils, water supply, hydrology and water quality, air quality, and biological resources). Furthermore, the policies and programs almost always fail to provide performance standards, which in some cases can substitute for fully-defined measures. Plans and policies should either be made more specific or meaningful performance standards should be provided, so that the effectiveness of plans and policies can be assessed. 7

6. **Mitigation Measures:** Few actual mitigation measures are proposed, due to attempts to "premitigate" impacts via the implementation of FORA Base Reuse Plan policies and programs. However some mitigations that are included are of marginal efficacy (e.g., water supply, hazardous materials) and almost none contain performance standards. Effective mitigation measures should be identified or performance standards should be provided, so that the effectiveness of mitigation measures can be assessed. Where feasible mitigation measures are not available to clearly reduce significant impacts to a less than significant level, impacts should be recognized as significant and unavoidable.

7. **Relationship of UC to Local Jurisdictions:** The relationship between local jurisdictions and UC (as a state agency) should be accurately and 8

consistently described. The role of UC as a participant (and potential permitting agency) in individual and cooperative planning efforts should also be consistently described.

8. Alternatives: CEQA requires that an EIR describe a range of alternatives to the project which would avoid or substantially lessen the significant effects of the project while allowing for the attainment of most of the basic objectives of the project. The alternatives evaluated in the FORA DEIR do not appear to have been selected to substantially reduce impacts. For example, an alternative should have been chosen which scales the amount of development to water availability. Furthermore, no project objectives are included which could provide a basis for assessing whether alternatives attain the basic objectives of the project. Project objectives should be provided, and an appropriate set of alternatives should be identified and analyzed. 9

9. Graphics: Many of the graphics are illegible or uninterpretable in the DEIR. All graphics should be made legible. 10

10. UC MBEST Center Project Description: We commend the FORA staff and consultants for incorporating up-to-date draft elements of the developing UC MBEST Center Master Plan as the FORA Reuse Plan and DEIR were being prepared. I am enclosing the most recent draft of the UC MBEST Center Master Plan. Although the enclosed draft Master Plan has not yet been adopted by the University of California, I request that you use it as the basis for the FORA Reuse Plan EIR's description of the UC MBEST Center and its evaluation of related environmental impacts.

Thank you for your review and response to these comments. We remain ready to work with the FORA staff to assure that these issues are adequately and completely addressed. Please feel free to contact me or to have the DEIR Consultants contact me if you have any questions about these comments.

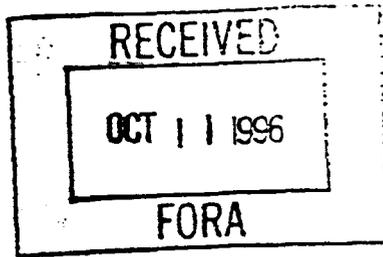
Sincerely,



Graham Bice
Director, Physical and
Environmental Planning
UC MBEST Center

enclosure

cc: Director Lora Martin
Vice Chancellor James B. Gill
Vice Chancellor Thomas Vani



October 11, 1996

Les White
Executive Director
Fort Ord Reuse Authority
100 12th Street, Building 2880
Marina, Ca 93933

Re: Comments on the EIR, Context and Framework Document

Dear Mr. White:

Thank you for the opportunity to comment on the Draft EIR, Context and Framework Document, Operations Plan, and Land Use Elements. The Housing Authority has reviewed the documents and would like to offer the following comments and corrections:

The EIR page 4-21 and 4-22 generally cites housing vacancy data and data relating to jobs housing balance. It should be noted this is 1990 data which has substantially changed since the 1990 census. This data should reflect a loss of 26,580 military personnel and family members and the loss of on-base and off-base military jobs. The 1990 vacancy rates quoted in the EIR have substantially changed with families finding it more difficult to obtain affordable housing units.

The rental prices quoted on Table 4.2-2 are inaccurate for 1996 rents. The EIR reflects data from the Reuse Final EIS, 1993, which is derived from 1990 Census data, and illustrated a total jobs Housing Ratio of 1.36. It should be noted the Section 8 Fair Market Rents, outlined in Chart 1-A below, are generally below regular market rents. The Monterey Peninsula has historically been a high rental priced area and the Authority regularly needs to grant exception rents of 10% higher than those outlined below.

CHART 1-A

BEDROOMS/SIZE	FAIR MARKET RENT
0-SRO OR EFFICIENCY	513
1 BEDROOM	600
2 BEDROOM	723
3 BEDROOM	1006
4 BEDROOM	1055

Page 2-29 of the Context and Framework document notes that the production of rental housing is not recommended during the first ten years of development at the former Fort Ord due to the abundance of this housing type existing in local jurisdictions. During the last month local Realtors, and property management firms have expressed concern over the extremely tight rental market in the area. Section 8 certificate and voucher holders have a difficult time finding affordable units for housing.

LYN ANN ROSEN
Chair

JESSA W. VALLARTA
Vice Chair

YORK F. GIN
Commissioner

MICHAEL NICHOLS
Assistant Commissioner

VIC REDULA
Commissioner

EMELIA STEEN
Assistant Commissioner

JOSH STEWART
Commissioner

MES S. NAKASHIMA
Executive Director

Mission Statement:

To provide, administer, and encourage quality affordable housing and related services to eligible residents of Monterey County.

334-1

CENTRAL OFFICE:
123 RICO ST.
SALINAS, CA 93907
408-424-2892
408-649-1541
FAX 408-424-9153
TDD 408-754-2951

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Page 4-25 contains information which makes assumptions on social trends based upon the implementation of the proposed project. The assumption is made that implementation of the proposed project would result in decreased demand for community services and job development programs due to decreased unemployment and increased economic activity in the region. It projects a reduced demand for services such as welfare and crisis intervention programs. This positive impact was identified in the Army 1993 Final EIS, and incorporated information regarding the positive impacts of the integration of the McKinney Act housing. Additionally, in 1993 welfare reform was not an issue. Today with current welfare reform, there will be a need for additional services to integrate low income non-working heads of households into the economy. Based upon the social trends outlined in the Coalition of Homeless Services Providers comments on the EIR and associated Draft Plans, the assumption should not be incorporated into the EIR at this point. It should be noted 15% of the homeless population is women and children fleeing domestic violence. Domestic violence victimization is not limited to socio-economic levels, nor is substance abuse, mental illness or other factors which cause the need for social services provision.

While economic development may foster upward mobility of underemployed individuals, the need for social programs, such as parenting support, day care, teen programs, crisis intervention and housing programs, will still exist. It should be noted that page 4-23 of the EIR indicates over 55,000 county residents or 15.5% of the total county population was considered economically disadvantaged in 1990. Today that number has greatly increased. Under the U.S. Department of Housing and Urban Development guidelines, a family is considered to be economically disadvantaged at 80% of median income for a family of four. The 1996 Median Income for a four person family in Monterey County was \$45,300, as published in the Federal Register on January 18, 1996. This data is derived from the Monterey/Salinas Metropolitan Statistical Data.

Page 2-26 of the Context and Frame Work Document indicates residential development will be critical at the former Fort Ord to achieve the employment generating development to capture the employment generating rates projected. The document indicates 1,522 family housing units in Marina located in Patton, Preston and Abrams Parks, which are currently vacant and deteriorating rapidly, may be refurbished and sold in a broad price range from \$95,000 for Patton Park units, to \$160,000 for larger units in Preston and Abrams. It should be noted that almost all of the Patton Park units will be converted to elderly housing under a plan by LifeSpan for conversion of Patton units. These elderly housing units will be marketed to areas outside of Monterey County, and thus will not supply affordable housing to achieve a jobs/housing balance.

Page 2-27 indicates that AMBAG and the reuse plan employment projection included demand for an additional 1,900 additional residential units in Monterey County between 1996 and 2000. The document projects between 1996 and 2000, 25% of the demand will be captured at the former Fort Ord, which will increase to 35% annually between 2001 and 2015. Data from the Context and Framework Document

334-2

(page 2-30) indicates much of the residential demand at the former Fort Ord will be derived from employment generated on the property. Thus an average income of approximately \$27,100 in 1995 dollars will be generated by the employers sited at Fort Ord. The document assumes to afford a home priced above \$90,000 a second wage earner is necessary, which would equate to an annual two earner incomes of \$54,000 to allow the purchase of a \$190,000 median priced home. The document assumes a mid-point income of \$40,000 allowing the purchase of a \$140,000 home.

Page 2-30 of the Context and Framework Document notes 50% of the total new housing production on Fort Ord will be comprised of the \$200,000 to \$275,000 market, with a mid-point in the \$235,000. This means the bulk of new housing projected will be priced at levels substantially above the medians for existing homes in the communities immediately surrounding the former base. The California Real Estate Trends Newsletter, September 1996, indicates the median home sales price and resale activity for attached homes in Monterey County is \$166,670 which is a 3.1% increase in price in the past year. The July 1996 median sales price for detached homes is \$237,630, which is an increase in price of 3.1% over last years median.

In order to mitigate a possible imbalance in the jobs/housing balance and to comply with State Housing Element law, it is requested that the EIR incorporate a mitigation measure which would require 20% of the housing developed on Fort Ord to be designated as Inclusionary Housing and deed restrictions for permanently affordable housing, to median and low income households. This mitigation measure is consistent with the needs identified in the Monterey County Housing Element, the City of Monterey's Housing Element and Consolidated Plan, the City of Seaside's Housing Element and Consolidated Plan and the City of Marina's Housing Element.

The Context and Framework document should note the following comments relating to the McKinney Act, as well as incorporate the comments noted in the Coalition of Homeless Services Provider's letter of comment on the Planning Documents and EIR. Additionally, it is requested the following be noted:

***Fort Ord-Facilities and Services for the Homeless
Under the McKinney Act***

During the past five years the Housing Authority has acted as the lead agency for coordination and sponsorship of a collaborative of eleven non-profit agencies which will either receive properties at Fort Ord under the McKinney Act, or will provide supportive services to the homeless. The collaborative effort has been successful in the acquisition of properties for the following agencies: Housing Authority-56 units for homeless farmworker families; Interim, Inc.-13 units for homeless mentally ill single adults; Shelter Plus-23 units for homeless single female heads of households and victims of domestic violence; Peninsula Outreach-9 units for homeless families. Children's Services International has entered into a Lease In Furtherance of Conveyance for the Family Services Center which is operational and serving 95 families. Occupancy of the transitional housing programs is expected to occur in Spring of 1997.

With technical assistance and financial support from the Housing Authority the collaborative has evolved into a separate 501(c)(3). The Coalition's Purpose Statement is: To promote interagency coordination for the establishment and operation of a comprehensive system of housing and support services for homeless individuals and families within Monterey County designed to increase self-sufficiency. The collaborative grantwriting efforts have cumulated in \$3,500,000 in Supportive Housing Grant funds, funding from the Monterey County Homeless Trust Fund for a Coordinator position, funding from the City of Monterey for pre-development costs, funding from the Packard Foundation for a fund development plan and public education and media campaign as well as media training.

Housing Authority of the County of Monterey-Pueblo Del Mar-

The Housing Authority, McKinney program, Pubelos De Mar will provide transitional housing and services for homeless agricultural worker families. Services will include referral for day care from Children's Services International, citizenship, planned parenthood, teen pregnancy prevention, parenting skills, youth sports, alternative employment and referral to existing community services. The goal of the program is to assist families to become self-sufficient, and to obtain the skills to retain permanent housing, resulting in a safe environment for the children of the families and for the agricultural products which the workers handle.

The Operations Plan-

The Comprehensive Business Plan makes a number of recommendations, one of which is the use of redevelopment agency powers and that this vehicle would be of major benefit and should be kept as an alternative financing strategy. It is strongly recommended that legislation be introduced which will allow a portion of the redevelopment (35%) housing set-aside authorized under SB 1600 to be utilized to maintain and fund the continuance of the McKinney programs as well as finance other affordable housing programs for the individuals who will live and work on the former Fort Ord, and on the Monterey Peninsula.

Thank you for the opportunity to comment on the draft EIR, Land Use Plan and associated documents.

Sincerely,



James Nakashima
Executive Director

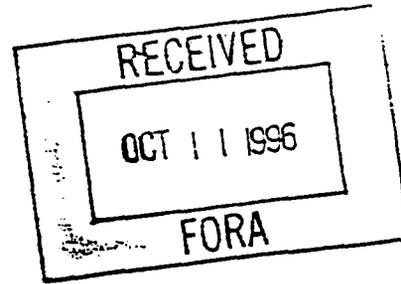
Housing Authority of the County of Monterey

SIERRA CLUB



VENTANA CHAPTER

P.O. Box 5667 Carmel, California 93921 408 • 624 • 8032



October 8, 1996

Fort Ord Reuse Authority
100 12th Street, Building 2880
Marina, CA 93933

Attn: Ann Hebenstreit
Ref: May 1996 Draft Environmental Impact Report

Greetings:

Thank you for the opportunity of commenting on this DEIR. We are concerned with a number of issues which are discussed below and to all of which we respectfully request substantive responses in the FEIR. Please avoid dismissive and/or perfunctory replies such as "comment noted."

PROCEDURAL ASPECTS ARE FLAWED

- Although the deadline for comments on the NOP has long since expired, we wish, nevertheless, to go on record in support of two of the comments made by the Ordnance and Explosive Waste Committee, Fort Ord Restoration Advisory Board (RAB) in its letter to you dated May 1, 1996.

We fully agree with the second paragraph of that letter which is headed, "I. The Notice of Preparation is Legally Inadequate and Must be Re-issued." The NOP failed to comply with legal mandates imposed by the CEQA Statute, Sec. 21083(b)(1) requiring the NOP to include for public comment "a copy of the [prior, Federal] Environmental Impact Statement."

- Stepping back further, like RAB, we are concerned that the EIS itself is legally flawed. Quoting again from the letter, "[Apparently] the Army does not classify ordnance and explosive wastes remaining at Fort Ord as 'hazardous wastes' subject to regulation under the Resource Conservation and Recovery Act (RCRA). Thus the EIS itself failed to abide by CEQA Guidelines; Sec. 15125 clearly requires the NOP to provide "a description of the environment in the vicinity of the project, as it exists before the commencement of the project, from both a local and a regional perspective."

- Moreover, we believe the entire DEIR is fatally flawed because, among other reasons, its objectives do not meet those with which it was charged.



Sierra Club comments

October 8, 1996

Sec. 2.0, par. 1. refers to FORA's enabling legislation, SB 899, which states: "The Fort Ord Reuse Authority Act ... requires FORA to accomplish the following: 3

- "a) To facilitate the transfer and reuse of Fort Ord with all practical speed;
- "b) To minimize the disruption caused by the base's closure on the civilian economy and the people of the Monterey Bay area;
- "c) To provide for the reuse and development of the base area in ways that evaluate the economy and quality of life of the Monterey Bay community; and
- "d) To maintain and protect unique environmental resources of the area."

Curiously, and in sharp contrast, Sec. 2.4.1, par.3 lists two quite different requirements: "...the project objectives of developing economic/employment recovery to compensate for base closure and accommodate regional growth."

We question whether "economic/employment recovery" has not already occurred. Since the base closure, economic indicators and statistics such as those for overall sales-tax receipts, employment and housing occupancy have all either remained stable or have risen. On what basis has the DEIR concluded that (quoting from SB 899) the "civilian economy" has been "disrupted?"

A recent impartial study contends that there has been no disruption. The study, by researchers in the non-profit Rand Corporation (Military Closures: The impact on California Communities, Michael Dardia, Kevin F. McCarthy, Jesse Malkin, Georges Vernez, RAND, February 1996, (MR-667-OSD) confirms this quantitatively:

"Monterey County had a slight drop in population and a modest drop in school enrollment after Fort Ord closed. However, their labor forces and retail sales grew and their unemployment rates were stable.

"Even the most dramatic of these changes were nowhere near the projections of local and state experts. For example, Fort Ord's closure was predicted to cause a 15 percent drop in the population of the surrounding communities. The real drop was less than 3 percent. Unemployment in the Fort Ord area was expected to jump by 7 percent; the actual increase was 1 percent. And retail sales near the closed base were forecast to plummet by 25 percent. They rose by 2 percent."

- We also contend that the document is flawed and inadequate because of its second stated objective: to "accommodate regional growth." Nowhere in SB 899 is there even such an implication.
- Conspicuous by its absence in the DEIR is an alternative which would fully meet SB 899's mandate. Its inclusion was recommended in a letter to you dated February 6, 1996 by the City of Salinas, a FORA member. Mayor Styles' letter commented on the NOP: 4 ✓

Sierra Club Comments

October 8, 1996

"The Program EIR should identify the level of development possible on Fort Ord from on-site wells without aggravating or accelerating the rate of seawater intrusion as required by the MOU between Fort Ord Reuse Authority (FORA) and the Monterey County Water Resources Agency (MCWRA). That is, one growth scenario evaluated in the EIR should be a [sic] constrained by on-site water resources and by no increases in the current rate of seawater intrusion."

Put more succinctly, Mayor Styles requested the evaluation of an alternative based on a *safe yield of on-site water*. No worsening of seawater intrusion means, without any reservation: over the long term, no overdraft of the on-site water. What's unclear, however, is how much water could be drawn to meet this "safe yield" criterion? The Army attempted an answer. The DEIS (Vol. 1, Dec. '92, p.4-57,58,59 states, "... the [safe] yield may be less than the total pumpage of 4700 acre-feet per year."

Whatever the exact number, it is less than 4700 AcFt/yr. Not the range between 9346 and 18,262 given in the alternatives evaluated in the DEIR.

A revised DEIR must be prepared in which such an alternative is addressed fully. A definitive number is required to characterize the safe yield of water. This will certainly require a comprehensive study by impartial hydrologists.

By failing to abide by the CEQA Guidelines ((e.g., Sec. 15126(d)) which require that a "range of reasonable alternatives" be described, the absence of Mayor Styles' alternative in the DEIR constitutes a most flagrant breach of the environmental review process.

Please comment fully on this concern.

NEED FOR A REVISED DEIR

We believe that a recent ruling by the Fifth District Court of Appeal (Sierra Club v. County of Stanislaus, FO23638, 8/8/96) is directly applicable to the present DEIR. In that ruling, certification of a DEIR for the development of a 5000-housing unit resort was overturned and a revised document demanded. The Court voiced its concern that, although buildout of the 29,000-acre project was expected to take place over 25 years, adequate water was assured for only the first five years. It ruled that environmental impacts for the entire 25 years had to be fully disclosed. Just how would 13,000 afa of water would be obtained and what impacts would be inflicted on the environment thereby.

51

Sierra Club Comments

October 8, 1996

In view of this ruling, is the DEIR complying with CEQA when it defers consideration of how it plans to provide the 18,262 afa required by the Preferred Alternative? (See, e.g., p.4-42, par.4.) To obtain this water the DEIR merely mentions a desalination plant without locating a suitable site for it or even suggesting how to dispose of its wastes (ibid.). It mentions another intriguing possibility: importing water. From where? From the Salinas valley basin which, itself, is suffering from serious overdraft and seawater intrusion? In Vol.2, p.4-160, a commendable objective is stated, "*Eliminate long-term groundwater overdrafting as soon as practicably possible.*" The means to accomplish this are less commendable. Programs are proposed. One for the City of Marina, e.g., (Program B-1.2) states: "The City shall work with the appropriate agencies to determine the feasibility of developing additional water supply sources for the former Fort Ord such as water importation and desalination, and actively participate in implementing the most viable option(s)."

Extending these omissions to other environmental impacts, is the DEIR in compliance with CEQA when it defers consideration of disposal of wastewater, storm water and solid waste, as well as the need for additional electrical, gas, cable and telephone facilities (Table 4.2.1)?

SUBSTANTIVE DEFECTS IN DEIR

Inaccurate quoting of official statistics

Some exceedingly salient data underlying the Proposed Project alternative are incorrect. In Table 5.2.1, Column 4, the DEIR lists the figure 66,612 as AMBAG's May '94 population forecast for Fort Ord. According to an AMBAG staff member, the correct number is 44,268. 6

The staff member also contests the accuracy of the projected rate of population increase attributed to AMBAG. For the Monterey Peninsula as a whole, the first paragraph of Sec. 5.2.1 states that, during the period 2000 through 2015, the rate of expected population growth is 2.61%; AMBAG's number is actually 0.9%. 7

Please make all applicable and appropriate changes in the EIR to account and adjust for the errors in Table 5.2.1 and Sec. 5.2.1.

Failure to address adequately cleanup of Hazardous Wastes from beach areas 8
 Chapter 4, Sec. 67675 of CEQA Guidelines requires the Land Use Plan element of an EIR to address "public safety." Surely, hazardous wastes fall within this province. And, according to definitions by the federal government, toxics as well as explosives are considered types of hazardous waste. Yet, despite the fact that a number of hazardous wastes exist in various sites on Fort Ord, nowhere in the documents is this discussed adequately. 9

Sierra Club Comments

October 8, 1996

A few examples follow:

- For many years, the 3-mile stretch of dunes along the coast was restricted to target practice. As a result, the sand is loaded with lead and other toxic metals.

The Army plans to transfer this stretch of beach to the California Department of Parks and Recreation. But before doing so, it is legally responsible for removing most of the lead and other toxic metals from the sand.

To meet this obligation, the Army contracted for a study to assess whether the health of a typical person enjoying a few hours at the beach might be endangered. The study concluded that in those areas of moderate and high lead concentration, people's health could indeed be jeopardized. Walking or lying in the sand, they could inhale or ingest amounts high enough to exceed EPA's lead level of concern.

Yet another of our concerns is that the Army proposes to clean up only those parts of the beach (Site 3 Beach Trainfire Ranges) where levels of lead are heaviest (above 10%). We doubt whether State Parks could legally accept areas where they are covered to a moderate extent (between 1 and 10%). Unless the lead is cleared even further from both of these areas, California's more stringent standard may not be met. Please furnish your opinion on the point made in this paragraph.

And still three other deep concerns:

1) Coastal beaches are unstable. Winter storms erode portions and deposit sand elsewhere. Once hundreds of feet from the shoreline, Stillwell Hall is now perched over it. Has the Army measured lead concentrations in offshore sand, at its surface and well below? If so, how was the lead sampled and what is its concentration?

2) Unexploded ordnance may be lodged in the areas described as light or moderate. While these may not pose a health threat, they pose an even worse life threat. How does the Army propose to remove or deactivate these?

Failure to address adequately cleanup of Hazardous wastes from main areas

3) In 1994, the Army adopted a proposal to dump much of this contaminated soil into a landfill (Operable Unit #2) within the main area of the Fort. Unlined, this landfill is known to be leaking. Surely, topping it with a coating of sand loaded with heavy metals will ultimately result in leaching of even more hazardous substances into the aquifer. To help allay our concern, please confirm whether this proposal is being implemented and describe fully its anticipated consequences.

• Many of the older structures on the Fort are known to have been coated with lead paints in single and multiple layers. Pipes and ducts in these older structures are still wrapped with tapes containing asbestos. Ceilings and floors contain asbestos-bearing materials. Before a structure is transferred to another owner, EPA requires that it be certified free of danger from asbestos. A specific case involves homes adjacent to the two golf courses which currently are being transferred to the City of Seaside. These homes are old and, as such, undoubtedly were painted with white lead and contain asbestos. How does FORA plan to handle this very serious concern?

12

• Another major concern is with unexploded ordnance (UXO) which may be present throughout the Fort. On p. iii, the LIST OF FIGURES references "4.6-3 Expected Locations of Unexploded Ordnance at Fort Ord...4-59." The figure on that page is entitled, "Seismic Hazards." Please correct this.

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It is anecdotally reported that, over many years, soldiers returning from a bivouac where they were engaged in target practice, would often surreptitiously bury the unexploded munitions rather than return them to the base. For the most part, this source of hazardous waste is largely disregarded in the DEIR and its accompanying plans.

14

Acting in what many consider irresponsibly, the Army, in the early days at the Fort, kept few if any records concerning where target practice took place. We have learned that recently the Army was surprised to discover unexploded ordnance in a portion of the area reserved for the California State University at Monterey Bay. Accordingly, Phases 2 and 3 of the transfer process had to be deferred.

Around 1993, these concerns were finally acknowledged by the Army. In a Preliminary Investigation, the Corps of Engineers reported that "Any land within the boundaries of Fort Ord should be considered a potential UXO site." To test this hypothesis, at least three widely separated test sites were selected for excavation. In all three large quantities of UXO were found. Please comment on this.

Finally, on the subject of UXOs as well as exploded ordnance, we are concerned about the hazards of residual chemicals in the soil. Trinitrotoluene (TNT) is a known carcinogen and, from UXOs throughout the base, may be leaking into the aquifer. Please address substantively the problems that TNT and other hazardous chemicals may pose to future transferees.

15

FORA's Cleanup Authority, Responsibility and funding

Section 67683 of SB 899, FORA's enabling statute, states that "[FORA's board] shall aggressively pursue all possible federal funding for the transfer, cleanup, and reuse of Fort Ord...."

Under the Defense Environmental Restoration Program (DERP), such funds are segregated in the Defense Department budget and are available in the current fiscal year. Yet there is no mention of DERP in the DEIR or in Vol. 2, Reuse Plan Elements, Sec. 4.6.3 which discusses existing hazardous and toxic waste conditions as they presently exist on Ford Ord.

Through the Fort Ord Restoration Advisory Board (RAB), the Army and the EPA are responsible for playing an important role in the cleanup process. This is outlined in a memorandum "for Army-wide distribution and implementation," dated May 7, 1996 from Robert M. Walker, Assistant Secretary of the Army.

To comply with this memorandum, RAB has access to funds provided by the Base Realignment and Closure (BRAC) authority within the Defense Department's overall budget. We are concerned that the disregard by the DEIR of its obligation to request whatever funding is needed to "transfer, cleanup, and reuse" Fort Ord represents a serious inadequacy of the document.

We understand that in May of this year, Sherri Wasserman-Goodman, Assistant Secretary of Defense for Environmental Issues, drafted a policy statement, "...military will not return to do additional environmental cleanup once reuse changes [have been formalized]."

What is the status of this draft? Will the public have the opportunity of commenting before it is finalized? Have all the transferees been notified of this proposed indemnification clause? Will future transferees be so notified?

Clearly, Walter Wong, Director, Division of Environmental Health, would object to this proposed policy. On August 25, 1996, he wrote a memo to Robert Slimmon, Jr., Director, Planning and Inspection Department, in which he stated, "There needs to be a discussion regarding the Army's long term responsibility for cleanup if additional contamination is discovered, that is related to the Army's activity, after the transfer of the property." Has Mr. Wong been apprised of the proposed policy? If not, do you plan to do so?

Sierra Club Comments

October 8, 1996

SUMMARY AND CONCLUSION

These comments have omitted references to traffic, endangered species, the infrastructure, cumulative as well as other potentially adverse impacts. Comments by others will probably address these.

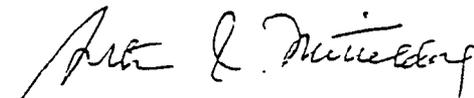
Even without their consideration, however, so flawed and inadequate is the DEIR that, to comply with CEQA Guidelines, it cannot legally be finalized and certified. That it violates these Guidelines is obvious. A recent ruling by the State Court of Appeal in Stanislaus County set a direct precedent. As in that case, the proposed Reuse Plan fails to disclose fully the environmental impacts during its entire 50-year duration,

To comply with CEQA Guidelines as well as its enabling act, SB 899, the DEIR must be thoroughly revised and then resubmitted for agency and public comments. In that revision, the extent of the plan should be limited by the "on-site, safe yield," of water. That is, *only* water available on Fort Ord should be considered as available. And the project at build-out should be projected on the basis of water pumped *only* to the extent that it does not cause further saltwater intrusion.

A final question: Is FORA vested with the authority to require cities and the county or Monterey to prepare mitigation programs? Note, for example (p. 4-41):

"Hydrology and Water Quality Policy C-7: The City/County *shall* [emphasis added] condition all development plans on verification of adequate wastewater treatment capacity."

Respectfully,
VENTANA CHAPTER, SIERRA CLUB



Arthur Mitteldorf, co-chair
Conservation Committee
AM/DM/SA/CG/GT

CALIFORNIA COASTAL COMMISSION

45 FREMONT, SUITE 2000
 SAN FRANCISCO, CA 94105-2219
 VOICE AND TDD (415) 904-3200

OCT 15 1996

FORA



October 10, 1996

Leslie White
 Executive Director
 Fort Ord Reuse Authority
 100 12th St., Bldg. 2880
 Marina, CA 93933

Re: Comments by Coastal Commission Federal Consistency Staff on
 Fort Ord Reuse Draft EIR, May 1996

Dear Mr. White:

Thank you for the opportunity to comment on the above-referenced document. As we have informed you previously, we intend to comment on plans and proposals affecting the coastal zone from the reuse of former Fort Ord, including, where we believe it appropriate, asserting the need for federal consistency review. This position arose from the Commission review of Consistency Determination No. CD-16-94 (U.S. Army, disposal and reuse of Fort Ord). During this review the Commission articulated the need for continuing review of future activities at Fort Ord, stating:

The Commission therefore remains extremely concerned over the impacts on the coastal zone from reuse, and the Commission intends to assure compliance with commitments made to the extent possible within the Commission's planning and regulatory jurisdiction.

Important concerns expressed by the Commission included the need for habitat protection, infrastructure planning, tailoring development intensities to available traffic and water supply capacities, and screening inland views from Highway 1. As part of its consistency determination, the Army included commitments by FORG (the FORA predecessor), for further infrastructure planning, tailoring development intensities to available traffic and water supply capacities, and screening inland views from Highway 1 with landscaping (copy attached). With this background, please accept the following specific comments on your Draft EIR:

1. Page 3-6, Polygon #12b, Land Use Proposal: Open Space/Recreation with Proposed Beach through Road. We agree with the statement in Column 3 that "land uses are consistent except for Beach through Road." [Emphasis added] Given that statement, we do not understand why the through Road remains a part of the proposal. We recommend that it be deleted from the proposal, for the reasons we have informed the Army and FORA in previous decisions and correspondence.

2. Page 3-11, Approvals and Permits Required, Section 3.7.4, California Coastal Commission. Several items are omitted from the list on this page, as follows:

336-1

(1) A Public Works Plan will be needed for the land seaward of Highway 1 (to be submitted by the Dept. of Parks and Recreation). If a Local Coastal Plan (LCP) were to be the appropriate planning mechanism for this land, an original LCP segment (rather than an LCP amendment, as it states on p. 3-11) would be needed. This is because the land, being federal land, is not covered under any existing LCP.

2

(2) Page 2-9 states that a "revised coastal consistency determination [will be] required," whereas there is no mention of a revised consistency determination within the "Approval and Permits Required" listed on page 3-11. This appears to us to be an internal inconsistency in the DEIR.

3. Page 4-10, Impact: Development in the Coastal Zone. We greatly appreciate the commitment that "FORA and CDPR will coordinate future use of the coastal zone through the CDPR master planning process and shall comply with the requirements of the Coastal Zone Management Act and coastal consistency determination." To be more accurate, the words "California Coastal Act" should be inserted after the words "Coastal Zone Management Act," as these constitute separate and often independent legal authorities.

3

4. Page 4-42, paragraph 4, states: "A desalination plant opportunity site (west of State Route 1) has been included as part of the proposed project and could potentially satisfy the remaining water demand." We do not understand why a desalination plant is being proposed west of highway 1, when it is equally feasible to site one east of Highway 1. In reviewing CD-16-94, the Commission found :

4

The Commission believes the desalination plant would diminish public access and recreation opportunities in the coastal zone, and, further, that feasible less environmentally damaging alternative sites exist east of Highway 1 for this facility.

The same comment applies to Polygon 14c, in the chart on page 3-6, which maps a desalination facility west of Highway 1.

Furthermore, if desalination is to be pursued or supported by FORA, the EIR should evaluate the impacts associated with this planning decision, including growth inducement, public access and recreation opportunities, coastal views, and marine habitat issues.

5. Page 4-43, Policy C-3, states The City/County shall prevent further seawater intrusion, to the extent feasible." The word "technologically" should be inserted before the word feasible; otherwise this policy would provide too much discretion to allow increased water withdrawals that could exacerbate seawater intrusion.

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6. Page 4-168, Impact/Mitigation Summary Chart. This chart proposes a mitigation measure consisting of stormwater detention to mitigate the "Need for New Local Water Supplies." This is inadequate; stormwater detention cannot possibly generate the thousands of acre feet of water that would be needed to supply water for full buildout. What should be added at a minimum

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is a policy clarifying that no new development shall be approved by the applicable local government entity unless adequate water supply exists to serve the proposed development. Such a policy does appear on page 4-43. However we are confused as it is stated as a "Hydrology and Water Quality Policy." Isn't that the wrong subject matter for such a policy, since it is more an infrastructure, water supply, and/or new development issue, rather than a hydrological or water quality issue?

7. Page 4-170, same chart, Traffic and Circulation system, Policy A-1. Similarly, we recommend an approach along the lines that applicable local government permitting agencies should withhold approval of new development that the regional circulation system cannot accommodate, at least until the regional circulation system is able to accommodate it. Please also note that widening of Highway 1, if necessary to accommodate proposed buildout, would require authorization by the Coastal Commission, as a permit or federal consistency matter.

Thank you for the opportunity to comment. If you have any questions regarding these comments from the federal consistency staff, please contact me at (415) 904-5292. You should also expect to receive additional comments from our Santa Cruz Area Office.

Sincerely



MARK DELAPLAINE
Federal Consistency Supervisor

Attachment

cc: Santa Cruz Area Office
Army Corps (Sacramento District)

7810p

FORT ORD REUSE GROUP

Reservation Road, Suite E, Marina, California 93933
(408) 384-0605 (408) 424-1356 FAX (408) 384-6232

Joseph A. Cavanaugh
Project Coordinator

RECEIVED

FEB 18 1994



February 15, 1994

Peter Douglas, Executive Director
California Coastal Commission
45 Fremont, Ste. 2000
San Francisco, CA 94105-2219

Dear Mr. Douglas:

The member jurisdictions of the Fort Ord Reuse Group (FORG) agree to the following mitigating measures in recognition of the potential effects that reuse of Fort Ord may have on the coastal zone and coastal zone resources, particularly water availability, traffic congestion, and visual resources.

Water Availability

The reuse of Fort Ord lands will be planned and implemented in coordination with the Monterey County Water Resources Agency (MCWRA) and other appropriate agencies to ensure adequate water supplies for coastal zone lands, including coastal-dependent agricultural and visitor-serving uses.

The initial phase of development will utilize existing water supplies in excess of Army and coastal needs. Subsequent phases will be based on the availability of new water sources.

The quantity of water required for coastal zone agricultural uses outside Fort Ord in the initial phase is assumed to be historic use levels. For the Fort Ord coastal zones uses, the amount of water required will be determined in coordination with the ultimate recipient of the Fort Ord coastal zone land (expected to be the California Department of Parks and Recreation).

Traffic Congestion

As a final reuse plan is developed, a traffic study will be undertaken, in coordination with the Transportation Agency for Monterey County, to assess the cumulative effects of the planned uses on area roadways.

If the traffic study shows that development will exceed approved local, Clean Air Act or Coastal Zone Management Act standards.

336-4 Attachment

EXHIBIT NO. 10

APPLICATION NO.

CD-16-94

FORT ORD

transportation supply and demand will be balanced to avoid these conflicts. This traffic study will also consider the potential hinderance to visitor accessibility to the Fort Ord coastal zone caused by traffic congestion.

Actions to be taken to balance supply and demand may include, but not be limited to, modification of development intensities, improvement of infrastructure, adoption of land use measures to reduce the number of vehicle trips, and provision of alternative transportation modes to reduce vehicle trips. Widening of State Route 1, as a means of eliminating congestion, will only be considered after full evaluation of the alternatives, comprehensive environmental assessment, and Coastal Commission review.

Visual Resources

To protect the visual buffer between the Fort Ord coastal zone and the inland areas of Fort Ord, the landscaping and natural landform screening immediately east of State Route 1 will be maintained and enhanced where necessary.

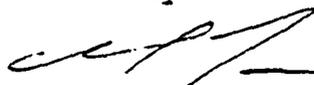
We trust that this action will reassure the Commission of the local communities' intent to plan and implement base reuse in an environmentally responsible manner and will eliminate the need for further consistency review for land uses proposed outside of the Coastal Zone.

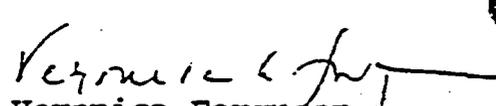
Sincerely,


Jack Barlich
Del Rey Oaks


John Longley *for Duke*
Marina


Fred Meurer
Monterey


Dave Mora
Salinas

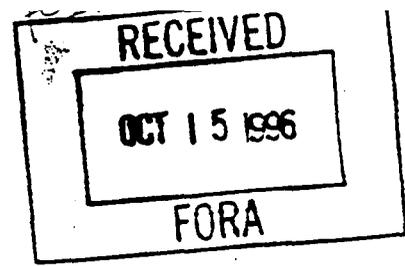

Veronica Ferguson
Monterey County


Sam Head
Seaside


Kelly Morgan
Sand City

cc: Jerri Lenox, FORSCOM; Lt. Col. Ron Perry, Fort Ord BRAC; Col. John Reese, Army Corps of Engineers; Doug Bilsey, TAMC; Bob Meyers, MCWPA

October 11, 1996



Fort Ord Reuse Authority
100-12th Street, Building 2880
Marina, CA 93933

Re: Comments on the 5/31/96 Fort Ord Reuse Plan Draft EIR
Public Draft Fort Ord Reuse Plan Volume 1: Context and Framework
Public Draft Fort Ord Reuse Plan Volume 2: Reuse Plan Elements
Public Draft Fort Ord Reuse Plan Appendix B: Business and Operations Plan

To the FORA Board:

Please find the attached comments on the Fort Ord Reuse Draft Environmental Impact Report, which was released on 5/31/96.

The Draft EIR is severely flawed. The document fails to fulfill the basic functions of CEQA.

The DEIR fails to provide adequate analysis of the project and its impacts. The DEIR fails to provide feasible project alternatives, and a project alternative designed to reduce significant environmental impacts.

The DEIR creates project objectives that have gone beyond the goals set by Senate Bill 899 that created the Fort Ord Reuse Authority and sets the requirements for the Reuse Plan.

The flaws in this DEIR are fundamental. A revised draft EIR must be prepared for recirculation. The on-site, safe-yield project alternative must be included.

Respectfully submitted,

A handwritten signature in cursive script that reads "Debra J. Mickelson".

Debra J. Mickelson
P.O. Box 7591
Carmel, CA 93921
408-624-8755

foraflaw

337-1

"Accommodating regional growth" is given as a project objective on DEIR pg 2-6. No definition of the term "regional" is provided. Are we to accommodate growth from the Monterey Bay area, Monterey County, the tri-county area, the state of California, the western United States? It is provided as a catch-all project objective that would be used as an overriding consideration by the FORA board in its approval of the 72,000 person project. The February, 1996, Notice of Preparation for this DEIR did not state this objective. Had the NOP stated this objective, it would have been challenged. Any attempt to use this phrase as a justification of a Reuse Plan, or any attempt to use this phrase as an overriding consideration will be challenged.

The DEIR is flawed because it creates a project objective that is not articulated in Senate Bill 899 and "accommodating regional growth" oversteps the goals stated in SB 899. This so-called project objective should be deleted from the next EIR.

"Aggregate totals" and "not to exceed envelopes" [Vol 1 pg 3-41] [DEIR pg 3-4] is also called the "ultimate development land use concept" for the Reuse Plan. Briefly, the aggregate totals are the 71,773 person city (of which 20,000 are CSU students) [DEIR pg 2-2], 22,000 development units (includes CSUMB's 8,000+ units and POM's existing 1,590 DU), 12 million square feet of office parks, 2 million sq.ft. of retail, 1,800 hotel rooms, 5 new golf courses [DEIR pg A-30 "Summary Land Use Concept: Ultimate Development"], developed or redeveloped on 10,327 acres [DEIR pg 5-2], requiring 18,000 acre feet of water [DEIR pg 4-42], requiring 10,972 acre feet of wastewater treatment capacity [DEIR pgs 4-36, 4-30], and requiring the creation of new 2-lane, 4-lane, and 6-lane roadways [DEIR Figure 4.7-3].

The DEIR and accompanying documents fail to provide analysis sufficient to justify the proposed "aggregate totals". The DEIR fails to provide evidence that the water, wastewater treatment capacity, and new road systems needed by the Reuse Plan can be achieved.

Further the DEIR fails to adequately assess the existing on-site constraints of seismic, 30% slope, soils constraints, viewshed protection, oakland retention, proximity to unexploded ordinance or toxic areas [see various so-called policies and programs in Volume 2 that rely on future studies and plans to analyze existing constraints]. Relying of future studies is a violation of CEQA. Further, the DEIR fails to provide a legal mechanism to forcibly down-size the "aggregate totals" should future analysis prove that stated "not to exceed envelopes" are not achievable.

The acquisition of former military lands by FORA, and/or the cities and county and the sale of those lands for private development are very unique circumstances. Extreme prudence must be exercised by government agencies in attaching any land holding capacity that cannot be completely justified in the Reuse Plan and its EIR. The DEIR allows the cities and county to sell the lands to private parties at any time. Detailed and sufficient land holding capacity analysis must be created prior to the approval of a Reuse plan and prior to land sales by cities and county to private parties. The EIR must provide sufficient analysis of the environmental impacts and provide feasible methods of creating major infrastructure improvements for the entire Reuse Plan

Additionally, the DEIR must prove that any particular project area (polygon) can in fact be built without violating the FORA Guidelines that must be created prior to the approval of any Reuse Plan.

Army Noted for the record: The past Army Environmental Impact Statements for Fort Ord Disposal Reuse have always clearly stated that "reuse...is an action to be taken by others" [DEIS Dec '92 pg ES-2], that the Army EIS "is not meant to be a development EIS", and that "separate, follow-up environmental documentation to comply with CEQA will be required" [FEIS Jun '93 Vol 1 pg 3-23, 3-54], and that "Reuse is not the Army's action...[and that] mitigation for reuse impacts is the responsibility of local agencies and private entities responsible for reuse and development, not the Army" [DSEIS Dec '95 pg ES-4].

Also noted for the record: The Army DEIS Dec '92 Vol 1 pg ES-2 states "The future use of Fort Ord property, as ownership changes from the Army to a yet unknown owner, is an issue of significant interest to the affected communities. The Army acknowledges its responsibility to ensure, within the limits of its authority, that succeeding uses do not lessen the quality of the community life or degrade the environment. The Army will take steps to ensure that succeeding owners protect historic or cultural resources, endangered species, wetlands, and other valuable resources to the extent possible."

Also noted for the record: "The Army does not have authority to issue or transfer water rights" [FEIS Jun '93 Vol IV pg 3-23].

Asbestos and lead - timing and responsibility of remediation The DEIR does not adequately describe the timing for the removal of asbestos and lead from existing structures or the timing of demolition of structures containing asbestos and lead paint. Buildings that contain asbestos and lead paint are hazard to health and an attractive nuisance and should be removed. Monterey County Environmental Health Department should help create a realistic strategy to assign financial responsibility and timing.

The next EIR must precisely identify the timing and the entity or entities that will financially, and physically responsible for the removal of these hazards. [see inadequate discussion and policies that rely on future "plans"-Vol 2 beginning pg 4-271].

CEQA-inadequacy of the 5/31/96 DEIR-scoping

"...Early consultation can solve many potential problems that otherwise would arise in more serious forms later in the review process. For instance, scoping can help identify the range of actions, alternatives, mitigation measures, and significant effects that the EIR should analyze. Scoping can also help focus the concerns of affected federal, state and local agencies, as well as the project proponent and other interested persons, including those who might regard the project as too environmentally damaging" [CEQA Section 15083]

A fatal flaw in this DEIR is its failure to present the data and project alternative requested by the City of Salinas (a FORA member) in its February 6, 1996 scoping

letter: "The Program EIR should identify the level of development possible on Fort Ord from on-site wells without aggravating or accelerating the rate of seawater intrusion as required by the MOU between FORA and the Monterey County Water Resources Agency. That is, one growth scenario evaluated in the EIR should be a [sic] constrained by on-site water resources and by no increases in the current rate of seawater intrusion."

The request for an on-site, safe-yield project alternative was reasonable and needs to be analyzed in a revised draft EIR. The DEIR contains the 72,000 person preferred alternative that requires 18,000 acre feet of water. The DEIR clearly states that no project alternative contained in the DEIR can, in effect meet the mandates of SB 899 (e.g., the alternatives do not incorporate a habitat management plan) To make matters worse, no alternative provided can rely on on-site, safe-yield water supply, [estimated to be 4,700 AF to 6,600 AF], that is, the DEIR alternatives require 12,000, 17,500, 18,000 and 9,400 acre feet per year with no explanation as to the water source [DEIR beginning pg 6-4].

Public Resources Code Sec. 21002 forbids agencies from approving projects with significant adverse impacts when feasible alternatives or feasible mitigation measures can substantially lessen such impacts.

The proposed Reuse Plan does not mitigate the impacts of water, wastewater treatment, major road improvements, the loss of viewshed, the loss of over 1,500 acres of oakland, etc. The refusal to offer a realistic project alternative that is constrained by on-site water (which would lessen other significant impacts as well) fatally flaws this DEIR.

The key issue is whether selection and discussion of alternatives fosters informed decision-making and informed public participation [CEQA 15126(d)(5)].

CEQA-inadequacy of the 5/31/96 DEIR-scoping

A scoping letter from Debra Mickelson, dated February 12, 1996, contained 25 requests for data. Of the 25 items, the following were not addressed at all or inadequately addressed in the DEIR (numbers are those used in the 2/12/96 letter and some requests have been shortened for these comments):

3. A proposed site for a wastewater treatment facility capable of treating 8,000 acre feet per year.

4. A complete and up-to-date list of reasonably foreseeable future projects in the Fort Ord vicinity.

5. A complete polygon by polygon listing similar to pg 3-6 through 3-9 DSEIS which provides some detail to the type of land use, total square feet...assumptions of heights...

7. Prepare a complete breakdown for each jurisdiction...These totals should then reflect the...square feet for UC "university research/science/office.

8. ..provide water use estimates based on water-conservation-driven formulas, e.g., as available from the Monterev Peninsula Water Management District.

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9. Develop an easily understood...written description of new freeways or other road types required, new freeway interchanges...The "trip generation" chart provided on DSEIS, page 5-25, must be amended to reflect all polygons and the current reuse plan... 16
11. Clarify and explain any still-existing conflicts between the project description in the DEIR and the current "visions" of each jurisdiction. 17
12. Place the proposed types of new development in some type of context, e.g., current total of retail and office space in surrounding jurisdictions currently; the current total acre foot per year use by the customers of Cal-Am (13,000+ AFY) and Marina Coast Water District (2,100 AFY): the current population of the Monterey Peninsula and Marina, and the historic rate of growth (by population) and changes in water use for the past 20 years (or longer). 18
14. Provide up-to-date data regarding the reported seawater intrusion underlying the Fort Ord and Marina areas, e.g., graphic depiction found on page S-4, Salinas Valley Seawater Intrusion program DEIR/S, December 1990. Special note and attention in providing current data on issues raised on pages 3G-12 and 13, e.g., "...assuming a rate for seawater intrusion at the base of 500 feet per year, a new well field would be adversely affected in 15 years." 19
15. Safe yield, as it relates to the current/or upgraded on base well field, must be adequately addressed beyond the apparent single reference found on pages 4-57,58 and 59, Fort Ord Disposal and Reuse, DEIS, Volume I, December 1992, e.g., "...This indicates that yield available to Fort Ord and other Seaside basin users may be less than the present total pumpage of 4,700 acre-feet per year." 20
16. ...For information, a one year period record of pumping from the current on site wells should be provided, reflecting the reduced groundwater pumping since the base has reduced its operations to the POM, e.g., it's understood that the use as of April 1995 was 2,875 AF for the preceding year. 21
17. The storm water outfall pipelines located in the future State Park...need to be addressed. If they will constitute an attractive nuisance the demolition costs could be estimated...determine exactly what jurisdiction or entity would have or share the financial responsibility...new method for properly handling the storm water issue ...addressed, realistically dealing with environmental and financial feasibility constraints. 22
18. ...CSUMB's housing must be clarified as to type of future housing envisioned, e.g., if most of the apparent new...units are dormitory or apartment type development, are these remodels of existing buildings, or completely new construction. 23
19. ...provide accurate development plans for the East Garrison plan so the DEIR analysis of those polygons can be meaningful and the cumulative impacts can be adequately discussed. As an example, the East Garrison is without adequate wastewater treatment facilities today, and any reuse would obviously need to address this issue. 24
20. Detailed data must be provided to explain the verbal references to "...allowed reuse plans could allow densities that are greater than commonly found on the Peninsula." The ~~density~~ density and height of any given future development projects will have repercussions of potentially great magnitude. As an example, the hopes for the future existence of an effective, affordable, heavily utilized transit system, cannot be 25 ✓

used alone to justify dense development. In Monterey County, extremely high density in various areas seems to create problems of crime, traffic, depressed housing values, over crowded schools, etc. Planning to create high densities seems to lack merit at this time. As this issue will create much community controversy, the options available should be clearly detailed in the DEIR.

21. A requirement for dispersed inclusionary housing (separate from CSUMB plans) must be discussed. Any old housing to be torn down and replaced with new residential development and any new residential development should be subject to an inclusionary housing rule. Attracting new economic development to any given area is most always directly tied to the availability of affordable housing for employees...

22. The "high visual impact potential" chart provided on DSEIS, page 5-46 should be amended as needed to include all polygons for the base. The decades of development of Fort Ord has resulted in a special sensitivity to viewshed protection. As an example, today as viewed from the scenic walking path in Pacific Grove, the only visible structures [on Fort Ord] are the water tower, the former hospital and the building known as Stillwell Hall located west of Hwy. 1. The continued protection of the viewshed must be determined as significant. This can be accomplished with height limits, density limits, and careful retention of mature trees, etc.

23. A polygon by polygon matrix providing the briefest summary of the maximum number of DUs, square feet of development types, maximum densities or heights, with a column for 2015 water use, the year 2015 traffic generation, followed by columns checking off current constraints to development, e.g., seismic high hazard zone, flood plain, slopes, soils, high visibility, vacant land now and/or no on-site sewer or water pipelines, non-civilian code roadways or no roads, etc.

24. [The NOP] stated that the year 1991 and the military's operations of that year will be used as the baseline for the DEIR. This seems to be fraught with danger to the intent of CEQA and could lead to endless confusion to the reader. Traffic patterns, as an example, for a military base are not the same as a civilian reuse effort. The historic water use practices the base may have contributed to the reported seawater intrusion underlying the base, and future water use practices cannot be allowed to knowingly exacerbate or cause any water quality problem. The wastewater flow by Army never exceeded their purchased capacity, however, the ability of future users to "re-purchase" the Army's capacity has not been assured. It is feared that the use of 1991 as the baseline, while supposedly legal, will seriously flaw the DEIR's analysis of an already complex reuse plan.

25. AB 3180 requires monitoring of impacts identified as significant or potentially significant. It's requested that the DEIR be crafted in a manner to clearly identify the potential significant impacts of the reuse plan, with the eventual goal of creating a Mitigation Monitoring Program to be administered by FORA. The ability for FORA to impose administrative and judicial sanctions, fines, cease and desist orders, restraining orders, require bonding as a disincentive for non-compliance, etc., should be analyzed. [end of 2/12/96 scoping requests]

It is noted that the failure to adequately address the issues raised in these scoping comments has helped to result in a fatally flawed DEIR. The omissions in many cases seem to have been done on purpose to mislead the reader. The EIR author has minimized disclosure of actual project impacts, in an attempt to minimize the appearance of impacts caused by the proposed Reuse Plan. This is the "ignorance is bliss" version of CEQA and will not be tolerated in the reuse planning process of the former Ft. Ord.

31

An EIR must be a good faith effort at full disclosure of the significant or potential significant adverse impacts of a stable finite project description. An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences [CEQA 15151].

A revised draft EIR must include the omitted data requested in the 2/12/96 scoping letter.

CEQA-inadequacy of the 5/31/96 DEIR-undefined impacts v full disclosure

32

The DEIR states on page 4-1 that *"Because of the general nature of the Reuse Plan, many of the impacts cannot be precisely quantified, and therefore identifying specific mitigation measures to address such undefined impacts is impractical."*

This EIR author comment is unsubstantiated opinion and must be deleted from the EIR. The DEIR tells us that over 18,000 AF of water will be needed by the reuse plan, 11,000 AF of wastewater capacity, and a large number of substantial new roadways or additions to create new 4-lane, and 6-lane roads. We do know what new needs will be created by this project. The impacts can be, and must be quantified. The entire purpose of CEQA is full disclosure of impacts; the mitigation of those impacts; or a selection of a less environmentally damaging project alternative.

CEQA-inadequacy of the 5/31/96 DEIR-general plan v specific plan

33

DEIR page 4-2 states *"The Draft Ft. Ord Reuse Plan is intended to serve as a general plan to guide physical development on former Ft. Ord and is not a commitment to any specific project, construction schedule, or funding priority."*

SB 899 defines what must be included in the Reuse Plan and that language is similar enough to the Gov. Code Sec 65451 definition of a "specific plan" that it is assumed that the cities and county will use the FORA-approved final reuse plan as a specific plan when dealing with future development projects. [see 9/13/96 DJM ltr to FORA attached]

Further the DEIR author's language is confusing because if it were actually true that the FORA reuse plan "is not a commitment to any specific project, construction schedule or funding priority"—why have years and millions of tax dollars been spent to create the reuse plan and an EIR?

The language should be deleted from consideration. A revised draft, with a new EIR author is requested.

SB 899 does state that "...after [FORA] has adopted a reuse plan, a member agency...may adopt and rely on the Fort Ord Reuse Plan...as its local general plan...until January 1, 1996 [SB 899 67675.1].

34

The EIR author has confused the priority of SB 899 that specifically outlines what shall be in the Reuse Plan, and states that the preparation and adoption of the Reuse Plan is the primary function of FORA, with the seemingly secondary function of the Reuse Plan, i.e., to serve as a document that may be adopted and relied upon as a general plan.

Its understood that new legislation has amended the 1/1/96 deadline mentioned previously. Please clarify what the new date if and provide the legislative reference.

CEQA-inadequacy of the 5/31/96 DEIR-"approve now" and "inform later"

35

DEIR page 3-10 states "...this program-level EIR would provide the basis for the required environmental review of...subsequent plans. If it is determined that no new effects would occur or no new mitigation would be required, these subsequent plan could be approved as within the scope of this EIR, and no separate environmental documentation would be necessary. However, if the proposed plans would result in effects not covered in this EIR, subsequent CEQA documentation would be needed. This documentation may include: an Initial Study; Negative Declaration; or Subsequent EIR."

This is some of the most intriguing language presented in the DEIR. Because, in essence, the EIR author asks FORA to approve the "aggregate totals" contained in the EIR and Reuse Plan, and promises to tell the public about the project impacts on a "project-by-project" basis.

This would appear to be, especially in the unique circumstance of a military base closure and reuse process, the epitome of government sanctioned piecemealing. CEQA prohibits piecemealing because it allow decision makers to hide the cumulative impacts of building, in this case, the 72,000 person reuse plan.

Another reason for great concern whether any further thorough environmental review would ever be done by individual jurisdictions is found in Appendix B page 1-9: the Fort Ord Reuse Plan will have a "simple but flexible growth management...regulatory framework [that] avoids unnecessarily costly and burdensome regulation that slows development approval and results in unpredictable outcomes." the reader assumes that this is attractive language for a developer and further assumes that the "unpredictable outcome" is the fear that some proposed project would be turned down. The language should be deleted from any further consideration.

36

The other great difficulty is that the technique of "approve now" and promise to "inform later" limits and virtually eliminates the authority granted to FORA in SB 899. SB 899 created the eight city and county, 13-member, single-legal governing body for the purpose of "creating," "approving" and "implementing" a reuse plan as defined in SB 899.

The "approve now" and "inform later" strategy is a blatant attempt to eliminate FORA's right to understand the consequences of its actions taken now. It is also a blatant attempt to thwart the public's ability to participate efficiently and effectively in

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the planning and environmental review process for the reuse plan. In other words, once the land is in the hands of the cities, county and/or a private developer, a member of the public would have to attend meetings in each of the four cities that will obtain land as well as the county, in order to convince a city and/or county that the jurisdiction's current environmental review of a 500-DU-golf-course-business-park-retail-250-room-hotel-project is not sufficient.

The FORA board was created so that a resident of Monterey County living in the unincorporated county or any city could meaningfully participate in the preparation of a realistic reuse plan for the former Fort Ord.

Finally, this "approve now" and "inform later" technique is an attempt to get more than 10,000 acres of lands into the hands of private developers. This creates the private land owners' "constitutional right to develop the land to its best and highest use", i.e., the "aggregate totals" created by the FORA approved Reuse Plan.

CEQA-inadequacy of the 5/31/96 DEIR-program EIR

37

The DEIR pg 1-3 states *"The program-level EIR is intended to be used as the CEQA compliance document for 'all public and private actions taken pursuant to, or in furtherance of, a reuse plan [which] shall be deemed a single project (Public Resources Code, Section 21166).'*

"...CEQA environmental review conducted for future individual projects that implement the Final Fort Ord Reuse Plan will be tiered to the EIR to the extent this program-level analysis remains adequate for such purposes..."

DEIR pg 1-4 states *"Additional CEQA analysis may also be required at the specific project level to give decision makers more information about site-specific issues which are not addressed in this program-level EIR..."*

"....This document is intended to provide guidance for such project-specific documents and also adequate CEQA review of cumulative and base-wide issues, which may not need to be addressed in subsequent tiered documents...."

This DEIR does not provide adequate analysis if the environmental impacts of the project (see this letter, water, wastewater, traffic; see also project alternatives). The EIR author says that the use of a program EIR allows analysis of project impacts, project-by-project, after the Reuse Plan is approved.

CEQA Guidelines state, however, that a program EIR should provide more exhaustive consideration of effects and alternatives than would be practical in an EIR on an individual [project]. A program EIR should ensure consideration of cumulative impacts that might be slighted on a case by case analysis. [CEQA Sec 15168(b)] CEQA also states that a program EIR will be most helpful in dealing with subsequent activities if it deals with the effects of the program as specifically and comprehensively as possible. [CEQA Sec 15168(c)(5)]

It is felt that the EIR author has tried to emphasize only one feature of the CEQA guidelines regarding program EIRs, i.e., that it is proper to analyze in detail a certain project that may go through the approval process years after the agency certification of the program EIR.

However, this DEIR does nothing to comply with the need for the program EIR to itself be "more exhaustive" in its consideration of effects and "more exhaustive" in its consideration of alternatives. It is assumed that the intent of CEQA in this section is that the EIR project alternatives be reasonable, and ones that, in this case, would comply with not only the mandates of SB 899 but would also include an alternative designed to lessen the environmental impacts. In this, the DEIR fails completely.

This so-called program EIR does not adequately address the cumulative impacts of build-out of the 72,000 person reuse plan. In fact, it states "*Some of the environmental impact analyses (e.g., projected traffic impacts) in Chapter 4.0 of this Draft EIR are based on the year 2015, in cases where specific requirements projected for a 40-60 year buildout could not be realistically determined.*"

The DEIR does identify the precise needs for 18,000 AF of water, 11,000 AF of wastewater treatment capacity, and the need for new and expanded 2-lane, 4-lane, and 6-lane roadways. But the DEIR states on pg 4-40 "The need for additional improvements for public services and utilities beyond the year 2015 would be evaluated and necessary improvements would be implemented on a project-by-project basis." The reader of these documents can determine, with some effort, that none of the existing infrastructure can meet the needs of the reuse plan build-out totals.

A fatal flaw of the DEIR is its simple refusal to address each of the overwhelming infrastructure requirements of the project. The source(s) of water are not identified. The location of a wastewater treatment facility with adequate capacity is not identified. And, of course, the environmental impacts of the water, wastewater systems and the road expansions are not disclosed.

CEQA does not support the use of a so-called program EIR, so-called tiering, and the 50-year build-out, as excuses to not comply with CEQA's mandate for full disclosure prior to project approval.

This DEIR is flawed so severely, it cannot be repaired in a final EIR. A revised draft EIR is needed, and a new EIR author is requested.

There is no mandate under CEQA to circulate a final EIR for written comments. Therefore, should the public and government agencies feel that the Final EIR is seriously flawed and not legally adequate, the decision makers must call for a new document to be prepared. Or, if the decision maker, in this case, FORA, votes a simple majority of 7 of 13 members to certify a legally inadequate document, the only recourse for the public is a law suit.

As the recent Stanilaus Natural Heritage Project/Sierra Club v County of Stanilaus/Diablo Grande Ltd Partnership case reminds us "...it's crucial...for a government decision maker to know what the 'project' is that the decision maker is approving...only through an accurate view of the project, may affected outsiders and public decision maker balance the proposal's benefit against its environmental costs, consider mitigation measures, assess the advantages of terminating the proposal...and weigh other alternatives [CEQA Sec 15168]."

Please note: references to specific CEQA guidelines is not meant to preclude the inclusions of others as a means of determining the adequacy of the DEIR.

CSUMB-When is the California State University Monterey Bay master plan scheduled to be complete? Please include it in the next Reuse Plan environmental document. Please add clarification as to housing, e.g., dormitory or apartment type development; new or remodeled buildings, building size and heights, etc. 38

Cal Trans-It's understood that Cal Trans has for some time, asked Army for an easement (distinct from the current Reuse Plan "by-pass" alignment) that would allow the future 4-laning of Hwy 68 in its current alignment. Please solicit comments from Cal Trans, Army and any other interested parties. Please compare the environmental impacts of the "by-pass" and the impacts of widening of Hwy 68 in its current alignment. Provide information about the interchange of the Hwy 68 by-pass and Hwy 218 (Canyon Del Rey Oaks Blvd.). 39

Coastal Commission Consistency-Please provide information as to the need for CCC to revise its Consistency findings regarding the Reuse Plan 40

Demolition costs-As recently as the regular FORA meeting held June 14, 1996, FORA staff and board members briefly discussed an agenda item regarding demolition costs for an unidentified number of structures on the base. The minutes of the meeting should reflect that by-in-large the demolition costs for the base are unknown. The DEIR and accompanying documents mention 8,000 buildings that do not meet civilian seismic code [DEIR pg 4-59], the fact that Stillwell Hall will fall from its eroding coastline perch, but the DEIR fails to provide information that would seem fundamental to the civilian reuse effort, i.e., the environmental impacts, timing and costs of demolition. [see asbestos and lead] 41

Density limits-The DEIR creates so-called "in-fill" opportunities that appear to be 4000 sq.ft. single family lots [Vol 2 pg 4-30] and creates densities of up to 20 DU/acre. Are the density levels gross or net per acre? Vol 2 pg 4-12 states that the current density for Ord within Seaside's sphere is 9.9 DU/acre. At the scoping hearing for this document, FORA staff referred to "allowing densities that are greater than commonly found of the Monterey Peninsula." The DEIR does not justify high densities in the proposed reuse plan. It appears that the only motive is to attract developers promising higher than average profits. Provide clear evidence that high densities are required. Lack of diligence about this matter now, will have potential detrimental impacts on viewshed, oakland retention, schools, public safety, etc. [see DJM 2/12/96 scoping ltr] 42

"Economic/employment recovery" is given as a project objective on DEIR pg 2-6. This objective was not stated in the NOP; had it been it would have been challenged. The DEIR inclusion of a new project objective "...of developing an economic/employment recovery to compensate for base closure..." leads the reader to believe that there is substantial evidence in the DEIR or accompanying documents to prove that there is, in fact something to "recover from". The DEIR provides no data. 43

Newspaper articles can be provided to the FORA board, staff, consultants that appear to refute the need for "economic recovery": Headlines include: "Peninsula housing sales rise" Sep '93; "Car sales up despite gloomy predictions...not hurt by Ord closure" Jan '94; "County jobless rate defies forecasts, improves since Ord closure" Feb '94; "Monterey County's real estate sales in sharp rise during April" May '96; "County awash in jobs...State jobless rate dips to 1991 level." July '96; "County rentals are scarce for students" Aug '96. 43

The public has asked FORA and its staff or consultants to provide economic information about each of the 8 cities and the county for the fiscal year ending 1989 and 1995 (i.e., for a fiscal year prior to the base closure's announcement, and for a recent fiscal year). Verifiable data requested: City/County general budget; sales tax; number of employed/unemployed; school enrollment. Requests have been made on 8/7/96, 8/22/96 and 10/7/96.

The DEIR contains no economic data regarding the base closure and its measured impacts on surrounding communities.

Data provided by Marina and Seaside for a memo issued by the Pacific Grove City Manager on July 31, 1996, for a meeting about the Ord Reuse Plan, appears to state that the losses suffered by Marina and Seaside have been \$300,000 and \$200,000 a year. It must be noted, however, that Marina and Seaside continue to receive an estimated, extra \$600,000 and \$800,000 a year from tax subventions monies based on the former Fort Ord military populations that once lived on the base. The military populations represented about 40% of each city's population according to Vol 2 pgs 4-8, 4-11, 4-13. On its face, this combined gain of \$1.4 million would seem to compensate for the combined 1/2 a million dollar loss. [clarification on tax subventions is requested]

The so-called project objective of "...developing an economic/employment recovery to compensate for base closure..." leads the reader to believe that the "peak employment" of the 17,700 military and 2,700 civilian employees [Vol 2 pg 4-83] must be "recovered" in order to "recover economically". The so-called loss of military jobs cannot be equated with the loss of 20,000 regular non-military jobs. The money earned by the military is literally spent in ways unique to the military and does not circulate in the way a civilian dollar circulates in our community. It should be proved or refuted that most of the military and civilian workers from Fort Ord were transferred or accepted retirement. Also, please state the year that "peak employment" was accomplished.

The proposed Reuse Plan "creates" 45,457 jobs over the 50-life of the plan [DEIR pg A-30]. The 45,500 jobs include the 3,200 jobs estimated for the build-out of CSUMB and the 310 jobs at the Presidio of Monterey Annex (POM, the remaining military presence on the former Fort Ord). Even if the reader was to accept the unfounded premise that a military job equates with a civilian job, we are asked, by this document, to accept that in order to "recover" from the supposed loss of 20,000 jobs we must create new office park, retail, hotel, and golf facilities that would theoretically employ 42,000 persons. This defies the common definition of the word "recovery". ✓

It is assumed that the inclusion of this "economic/employment recovery" project objective has been devised for use as an overriding consideration in the project approval process. Any attempt to use "economic/employment recovery" will be challenged. 43

A lead agency "...must never assume that growth in an area is necessarily beneficial or of little significance environmentally, but must make its judgement in this regard only after open-minded analysis" [CEQA 15130(a), 15126(g), 21100(g)].

This "economic/employment recovery" project objective should be deleted from consideration in the next EIR.

FORA guidelines-Volume 2 refers to "regional urban design guidelines" [4-33], "community design standards" [4-51], "general development charter and design objectives" [4-53], and the "Fort Ord Reuse Plan Framework" [4-53]. The DEIR and so-called Monitoring Plan approach is to devise all of these different standards after the approval of the final Reuse Plan. That will be too late. 44

FORA must create simple, basic standards of density limits, height limits, viewshed protection (not limited to 500 feet off of Hwy 1), oakland retention, etc., that can be incorporated in a new project alternative, to be included in a revised draft EIR. FORA needs to establish realistic priority development areas, i.e., developers should not be allowed to forge into vacant lands while abandoned Army buildings stand with infrastructure in place. FORA will want to consider seismic issues, the building demolition issues and development proximity to identified areas of hazardous waste, toxics, and UXO (unexploded ordnance). FORA guidelines should also include a mandatory, on-site, dispersed affordable housing rule for new and renovated housing.

Growth inducing-A way to measure the size of a project is to look at the water use. The DEIR states that the project needs over 18,000 acre feet [pg 4-42] at the 50-year build-out. The DEIR fails to provide any data as to the existing water use in the Monterey Bay area. The entire area will use about 20,000 AF this year (15,000 AF for Cal-Am customers, 3,000 AF by private wells in Carmel Valley, and 2,000 AF by the Marina Coast Water District). It has taken literally 200 years to create the population and business community that uses 20,000 AF. By this definition alone the Reuse Plan is growth inducing and must be treated as such in the EIR certification and project approval process. 45

Monterey County had 360,000 residents in 1991 [Vol 2 pg 4-14] including the 30,000 Fort Ord military population. The area has documented traffic and water deficiencies. Approving what by any reasonable definition is a growth inducing project, will only repeat the mistakes made decades ago in other parts of California, i.e., to try to "grow" out of today's problems. Appendix B, pg 1-4 states that the project goal is to "Build out the reuse plan as quickly as the market will permit." This language should be deleted from consideration.

Growth projections-The DEIR fails to provide vital information regarding the historic growth rate of the Monterey Bay area. Data presented to the public prior to the November, 1995 unsuccessful vote to fund the New Los Padres Dam, indicated that the total of 3,381 AF of water to be released over a twenty year period of time was going to create growth of 1% per year. This plan would release 18,000 AF over a fifty year period. On its face the Dam project would have created 170 AF per year of growth which was called 1% growth for twenty years. The Reuse Plan would release 360 AF per year for fifty years. It would seem that this plan produces at least 2% growth per year for, of course two-and-a-half times longer period of time. It's understood that our historic growth rate has been 0.5%. This plan would accelerate our growth, at a rate four times higher than our historic rate.

46

It's understood that AMBAG did not create the growth rate figures attributed to them in the DEIR. Simply put, the EIR author wrongfully attributed projected growth rates of over 2% per year to the government agency responsible for creating growth projections. Therefore, it must be assumed that the EIR author made up the projections for the purpose of justifying the proposed Reuse Plan. This issue must be clarified.

The revised DEIR must include verifiable data on the historic growth rate for the Monterey Bay area.

Height limits-The previous proposed reuse plans have been even more aggressive than the current proposal. The *Monterey County Herald* headline on October 23, 1993, read "Ord plan includes 29 new high-rises...Reaction to revised Fort Ord plan immediate, harsh". The October 1993 FORG Plan had assumptions of 25.5 million square feet on 2,600 acres which resulted in 21 7-story buildings, 4 5-story buildings and several 12-story hotels. The 1996 Reuse Plan has assumptions of 14 million square feet located on 1,500 acres. Thus, there is concern that there is still a potential for high-rise buildings.

47

While buildings over two or three stories may be common in urbanized areas of California they are a rarity here and are most often not welcomed into the neighborhood. In an area with relatively moderate land prices and in an area with vacant commercially-zoned land, the only reason to allow developers to build high-rises is to maximize developer profit.

The current EIR does not reveal either the heights allowed by the plan or the heights that are mandated, in essence, by the ratio of square feet to acreage. A disclosure of heights was requested in the scoping comments. The request was ignored. A 7/23/96 *Herald* article states that in a joint Seaside-Marina city council hearing, it was revealed that a 340 acre "mixed use" site contains 3-story office buildings, apartments and a shopping center. The EIR should inform the public as well as the local newspaper. Include designed heights and/or maximum allowed heights in the next EIR.

Hotel rooms-The DEIR and accompanying documents fail to provide accurate data regarding the hotel rooms in the planning stages in the area. CEQA demands a discussion of the reasonably foreseeable projects in the vicinity of the proposed Reuse Plan. The Monterey Bay area has a \$1 billion hospitality industry. The current number of rooms is approximately 9,300 rooms. 48

The DEIR Reuse Plan proposes 1,790 hotel rooms [DEIR pg A-30]. The EIR author is in error in Vol 1 pg 2-33 when it states, "*Other than a few highly controversial hotels proposed in the Coastal Zone in Sand City and Marina, few other new facilities are likely to be developed.*" The comment is unsubstantiated opinion and must be deleted from consideration. Further, the lack of full disclosure of plans that are currently approved, are undergoing CEQA review, and/or have received news coverage, misleads the reader.

The current 9,300 hotels rooms could increase by 50% if all the proposed projects totalling 4,760 rooms were built. The 4,760 rooms include 200-room Cannery Row, 1,790-room FORA, 1,780-room west of Hwy 1 across from Marina, 300-room Armstrong Ranch north of Marina, 150-room Rancho San Carlos, 430-rooms (plus 550 DU) west of Hwy 1 across from Sand City, and a 6-story hotel in Seaside.

The Reuse Plan has 5 new golf courses, and another 5 are proposed at Armstrong, Rancho San Carlos, Monterra Ranch, Bishop Ranch, and Pebble Beach. The 10 new golf courses would be in addition to the 18 courses that exist now in the Monterey Bay area.

The omitted data needs to be included in the next EIR.

Inadequate baseline data-The DEIR contains no information about current water use on the former Fort Ord; no specific data about the current status of the seawater intrusion that reportedly intrudes the 180' and 400' aquifers under the base; and no updated study on the safe-yield for the base. All this data was requested in the DEIR scoping comments. This is a serous omission of data in the draft and seems to have been purposely omitted. Given the importance of the water issue for the proposed project, this omission fatally flaws the DEIR. Adequate water data must be disclosed in a revised DEIR. 49

Also, please include the Figures used in the Army EISs that were requested in the 2/12/96 scoping comments, e.g., 30% slope, high visibility, vacant land.

Inclusionary housing-The DEIR Reuse Plan proposes over 22,000 housing units including the 8,000 units for CSUMB and the existing 1,600 units within the POM Annex. This means that over 12,000 housing units are proposed to be built or renovated in FORA's portion of the Reuse Plan. 50

The DEIR does not address the need to mandate on-site, dispersed low and moderate income housing for the Reuse Plan. In fact, Vol 2 pgs 4-32, 4-38, 4-43 state "*The City of Marina, the City of Seaside, the County of Monterey shall identify focused areas and develop inclusionary zoning to encourage group homes and flexibility in household size and composition.*" ✓

The Fort Ord Reuse Plan would constitute, by far, the largest project ever approved in the county's history. The language used in Volume 2 is repugnant. The low and moderate income family would, under this "Program", be set apart from the so-called community created by this reuse plan. Specifically who suggested this wording?

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This "Program" is the finest example of why the proposed policies and programs should be deleted from further consideration. The FORA board has a responsibility to meet the needs of the entire Monterey Bay area community. The revised DEIR must include a firm policy regarding the mandate for a 15% inclusionary housing, dispersed throughout all residential areas that are renovated or newly developed.

It should be noted that this so-called program would be in conflict with Monterey County's housing ordinance. Further, it's understood that HUD needs to sign off on the base closure plan and that HUD requires that the low and moderate income housing issue be addressed appropriately. It is hoped that HUD would refuse to agree to the above "Program". Should HUD refuse, it's understood that the Reuse Plan could not go forward.

Vol 2 pg 4-26 states "*Both the cities of Seaside and Marina have a sufficient supply of low income housing within their existing residential areas.*" The comment is unsubstantiated opinion and should be deleted. Further, it would seem that the County could also make the same argument, and refuse to require a developer building more than 8 units to address the inclusionary housing rule.

Please provide an accurate summary of the full intent of AB 1820 that was mentioned in the 7/2/96 *Salinas Californian* where it said that AB 1820 exempts Marina from affordable housing laws "so it could rent homes".

Internal inconsistencies-The introduction in the DEIR pg 1-1 reprints a pertinent portion of SB 899 stating that the "Fort Ord Reuse Authority Act...requires FORA to accomplish the following:...to facilitate the transfer and reuse...to minimize the disruption caused by the base's closure...to provide for the reuse and development...in ways that enhance the economy and maintain the quality of life...to maintain and protect the unique environmental resources of the area."

51

It is suggested that the requirements of SB 899 and the proposed reuse plan are inconsistent.

Land sales-no constraints Today there is no privately held land on the former Fort Ord (i.e., no private individual, local small developer, or large outside developer owns any land) and no legal mechanism exists in the DEIR to prevent all land from being sold immediately once it is in the hands of the cities and county.

52

The DEIR states that the 1996 Reuse Plan will develop over 10,000 acres of land, of which 4,000 acres are vacant lands. The DEIR has not disclosed the environmental impacts of building this project and the existing environmental constraints including the existence of toxics and UXO have not been adequately analyzed. Yet the "aggregate totals" will be established with the approval of the Reuse Plan. Any astute developer or

private land owner will insist on developing his land to its "best and highest use" as created by the Reuse Plan's "aggregate totals". 52

FORA does not have to allow developers to buy land to develop projects that will overwhelm the existing infrastructure, that would put an unfair financial burden on the existing residents, or that would threaten the long-term viability of the billion dollar hospitality industry and two billion dollar agriculture industry.

The DEIR fails to provide a legal mechanism to prevent land that has no viable infrastructure from being sold to private parties. Either the project has to be downsized to a manageable size where the impacts and mitigations can be assessed today, or severe restrictions have to be created to prevent speculative land sales by the cities and county.

Land use-The DEIR states that the 50-year Reuse Plan will develop over 10,000 acres [pg 5-2] and that in its 80 years of control the Army developed 5,000 acres [pg 4-3]. The Reuse Plan will develop 4,000 acres of currently vacant land [Vol2 pg 4-18]. The Reuse Plan would double the amount of land currently developed. 53

Vol 2 pg 4-16 states that the "projected development yield" is based on market absorption, land characteristics and community vision.

Does the 10,327 acres of developed land include the right of way for the Hwy 68 by-pass? If not, what is the Cal Trans estimate of ROW for the Hwy 68 by-pass?

Landfill-The landfill at Fort Ord is one reason that the base was designated a Superfund site. A 8/31/96 *Herald* article stated that 21 housing units in Abrams Park, located next to the landfill, were "so beyond repair they will have to be demolished...those houses broke apart as they settled on the Army landfill underneath them." 54

The DEIR does not discuss sinking houses. Are other houses built over the landfill or target ranges? Does the sinking of the houses indicate a high shallow groundwater table due to the heavy rains in 1995? Were the houses badly built? Do other homes need to be removed due to structural, or more importantly, health and safety issues?

The May 1996 DEIR Figure 3.2-1 indicates plans for a golf course on polygon 8a which is the landfill [see also pg 3-5]. Army and its agents have repeated advised against any active use. The California Regional Water Quality Control Board in their letter dated 2/19/93 in the FEIS Vol IV, June 1993, states "Many of the identified land uses alternatives at the inactive Fort Ord landfill are incompatible...the landfill will remain as non-irrigated open space." 55

The CRWQCB advice and the continued willingness to ignore valid comments, is used to illustrate the continual problem of an individual jurisdiction not accepting the realities of base reuse. Too many FORA board members, jurisdiction staff, FORA staff and consultants have not taken the time to review the large volume of data created over the last years in the Army EISs, and incorporate that wealth of information in the current Reuse Plan and/or DEIR data. The 4/13/95 *Herald* quotes the toxic firm hired by Army "It is a habitat area, no golf course will ever be put there...You can't put anything on top of a cap..." A CRWQCB staff member states "There will be no golf course." Army ✓

Corps states "It is virtually impossible to build a golf course on top of that landfill. I think it would be economically prohibitive for another agency to go through all the permitting and paperwork necessary..."

McKinney Act recipients-It must be noted that much has been made over the last few years about the financial hardships caused by the costs of providing police, fire and related services to the non-profit agencies that have already been granted rights to properties on the base. DEIR pg 2-8, Table 2.4-1 states that 406 persons, out of the proposed reuse plan's 72,000 person build-out, will be accommodated by the non-profit facilities. 50

Does the EIR author agree that providing services to 406 residents and other non-profit activities related to the McKinney transfers, creates a great financial burden? It would seem that providing infrastructure and services for the 72,000 person city will create greater hardship.

Mitigation measures-should not be confused with the project 57

DEIR page 4-1 states that "...*CEQA case law has endorsed an approach that permits an agency to defer specific mitigation measures until later, if the agency commits to satisfying specific performance criteria articulated at the time of project approval.*"

It must be stressed that this DEIR and accompanying documents continually confuse "mitigation measures" with components of the actual project, i.e., the Reuse Plan. To understand, a reader must start with the DEIR Table 2.5-1 that begins on page 2-16 and then go through Volume 2 and find the Policies and Programs (PPs) that are a part of the so-called Mitigation Plan.

The logic presented in the DEIR seems to conclude that the project is mitigated or partially mitigated through the so-called Monitoring Plan and PPs because the following might happen: traffic is mitigated because someday new roads will be built, water is mitigated because someday new water supplies will be created somehow, wastewater will be treated because someday, treatment capacity will appear somewhere. Other major identified impacts are mitigated by a never-ending array of promised future studies and plans.

Or if all else fails, part of the 72,000 person project won't be built [see policies and programs, e.g., Vol 2 pg 4-162-"The city shall condition approval of development plans on verification of an assured long-term water supply for the projects."]. The DEIR does not state which portions of the 72,000 person reuse plan are expendable. Nor does it explain what the developer will do with his undevelopable land.

CEQA mandates that an EIR assume that the entire project will be built and mandates full disclosure of the project impacts. CEQA states that it is not mitigation of a significant environmental impact of a project to say that if an impact is not addressed then the project will not be built. [CEQA 15144]

On the other hand, an example of mitigation measure that would be legally enforceable by FORA and that would be meaningful in this civilian reuse process include:

FORA shall allow no city or county or any other current or future land holder at Fort Ord to sell land, transfer land, or give land for the purpose of development, without proof of current and long-term availability of water, wastewater treatment capacity for the entire approved Reuse Plan and proof that road handling capacity exists both on and off the former Ft. Ord.

Newly excessed parcels-Phase II of the screening of McKinney applicants include many agencies from outside our area. Where in the DEIR is the Phase II excessing by Army discussed? What polygons are involved? And do the Reuse Plan proposed uses allow the inclusion of any or all McKinney Act applications? When will this issue be resolved by the feds?

58

"No project alternative" in DEIR-

59

The DEIR "no project" alternative "...would occur if the former Fort Ord was unable to adopt a reuse plan. [pg 6-16]...impacts would not be reduced to insignificant levels as under the proposed alternative because there would be no FORA Reuse Plan and therefore no policies and programs for local jurisdictions...[pg 6-18].

The DEIR "no project" alternative creates a city of 34,000 persons (including 20,000 CSUMB FTE students), with 10,000 DU, needing 9,300 AF of water, and 6,500 AF of wastewater treatment capacity. Fort Ord had a base population of about 30,000, living in 6,000 DU, using some over 5,000 AF of water, and never exceeded their purchased 3,000+ wastewater treatment capacity. The DEIR states that the DEIR "no project" "...would result in the least environmental impacts, and is...the environmentally superior alternative..." [DEIR pg 2-6]

To state the obvious, had the DEIR contained the scoping request for an on-site, safe-yield alternative, the document would have selected the undefined project requested by the City of Salinas, a FORA member. Please comment.

This no project alternative does not seem to meet the legal purposes of CEQA. For the purposes of CEQA, the DEIR might have used the Army DEIS Dec 1992 Alternative 5, that reflects open space and the 4,800 person POM military presence. An explanation could then have been made of the long-term build-out of land transfers that had occurred as of the date of the DEIR. Please comment.

60

The DEIR refers to the no project alternative as "caretaker status" and warns "The longer these properties are in caretaker status and conveyance is delayed, the greater the probability of increased fuel loads leading to wildfires that could be hot enough to adversely affect soil fertility." [pg 6-19] Will the need to avoid a soil fertility crisis be used as an overriding consideration in the project approval process?

61

Past proposed reuse plans-

Past proposed reuse plan alternatives are noted for the record. Alternatives were compiled "desires and needs" offered by multiple cities and the county, by FORG, and by FOEDA: Alternative 1 - 250,000 persons; Alternative 1C - 280,000 persons; Alternative 2 - 113,000 persons; Alternative 3 - 83,000 persons; Alternative 4 - 31,000

62

persons; Alternative 5 (open space) - 4,800 persons; Alternative 6 - 128,000 persons; [Army DEIS Dec 1992 pg 2-2] It is noted that the first few alternatives had homes, office parks, hotels and a prison located in the unexploded ordnance fields. Alternative 6R - 23,000 persons, 10,000 DU, needing 12,000 AF water. Alternative 7- 60,000 persons (including 20,000 CSU students), 14,000 DU, needing 17,500 AF water. Alternative 8 - 65,000 persons (including CSU), 15,000 DU (+CSU), needing 18,000 AF water. DEIR No Project Alternative - 34,000 persons (unclear how many CSU students), 10,000 DU (with CSU), needing 9,300 AF water. DEIR preferred project - 72,000 persons, 22,000 DU (includes CSU), needing 18,000 AF water.

Of the alternatives, the only one analyzed under CEQA is the current preferred project. The analysis of that project in this DEIR is inadequate.

Phasing-lack of-Given the size of the proposed project, it is said that the build-out is phased. Where does the DEIR disclose the specifics of phasing? 613

Planned development mixed use district-the pink polygons

The Army EISs have the clever and useful strategy of dividing the base into polygons or smaller chunks of the base so that the reader could better understand the types of proposed or existing uses. Care was taken to describe acreage and specific proposed uses, e.g., a certain number of houses, square feet of office park/retail, number of hotel rooms, etc. The importance of the polygons and the types of uses was, of course, that this served as a means to estimate not only water use, but estimate traffic flows, as well as judge impacts on viewshed, and measure compatibility between uses, etc. 64

The DEIR introduces a disturbing and significant nuance: the pink polygon [DEIR Figure 3.2-1] aka "*Planned development mixed use district*" [pdmud]. There appear to be about a dozen of these newly created land use designations. The contrast in uses proposed in this DEIR are significantly different than the proposed uses in the 12/94 FORA plan, especially around the airport areas. Vol 1 pg 3-55 states that the pdmud "*...is intended to encourage the development of pedestrian-oriented community centers...contain[ing] a wide variety of residential detached and attached homes, commercial,..retail..office...civic..community centers..parks, schools, churches, day care centers, transit centers, and entertainment uses.*"

There are many disturbing trends caused by the "pink polygon" problem, but to mention a few: The UCMBEST research and development facilities are not allowed within this land use. Traffic calculations will be impossible to estimate. The cities and county will be able to approve almost any project in the pink polygons. This may be the intent of some, but this is nothing more than asking FORA to approve a Reuse Plan that authorizes chaotic land use.

The use of pink polygons and pdmud should be deleted from consideration as it only eliminates any ability to reasonably calculate traffic flows, compatibility issues, estimate water use, etc.

33-10

Policies and programs-

In an attempt to create mitigation measures the DEIR creates a number of policies and programs. The chart beginning on DEIR page 2-16 identified as Table 2.5-1 "Summary Table of Proposed Project Impacts and Mitigation Monitoring Plan" leads the reader on an adventure of locating the referenced so-called policies and programs that are part of the Volume 2 text.

DEIR pg 3-9 states *"The policies and programs serve as mitigation measures to lessen or alleviate the potential impacts of the proposed project. The policies and programs are, in effect, a separation of mitigation responsibilities by jurisdiction and can be considered in that light when general plan amendments and master plans are proposed for adoption."*

Provide proof that policies and programs are legally enforceable.

On DEIR pg 1-5 the term "self-mitigating" is used. What does this mean?

It should be noted that pg 1-5 goes on to state *FORA must adopt the Reuse Plan, including all policies and programs incorporated in it, in order to approve implementation of the proposed project."*

For the reader to critique each policy and program would be a waste of time and effort. But the following is an example of the Policies and Programs (PPs) that "mitigate" the project's need for 18,000 acre feet of water: Volume 2 beginning on page 4-162: *"The City/County shall ensure additional water to critically deficient areas...shall identify potential reservoir and...impoundment sites...shall prevent further seawater intrusion, to the extent feasible...shall...estimate the current safe yields...shall determine the extent of seawater intrusion..."*

It can be summarized that the bulk of these PPs are empty words constructed for the effort to gain FORA's approval of the 72,000 person Reuse Plan through a statement or finding that an issue like the need for 18,000 AF of water has been adequately addressed by the Monitoring Plan and accompanying PPs.

The PPs should be deleted from consideration in any future EIR as they only mislead the decision maker and the public.

Presidio of Monterey Annex-The Presidio of Monterey Annex is planned to remain as the military presence on the former Fort Ord. For a number of years the city of Seaside has worked to move a portion or all of the POM to another location.

Vol 2 pg 4-35 has a "Program" that states *"Seaside shall develop an agreement with Army to implement the reconfiguration of the POM Annex community."* It is unnecessary to ask FORA to approve this program. The language should be deleted.

The DEIR pg 1-5 states that there is to be a *"slight reconfiguration of the POM annex"*. To the reader, the Vol 2 Figure 4.1-8 map shows that over a third, or perhaps half of the existing POM must be moved. It will be moved to land that appears to be vacant land now and, based on Army EIS data, the vacant land would seem to have existing constraints, e.g., soils, oakland retention [Vol 2 Fig 4.41], 30% slope, high viewshed visibility, and seismic [location of Ord terrace fault continuation-Vol 2 Figure 4.6-1]

Under the current Seaside program, what number of military housing units and/or other facilities must be built? What number of existing military units must be torn down? What number of new civilian units will be built? Will the civilian housing be placed on the same acreage as the military housing? Where is this explained in the DEIR or accompanying documents?

Program EIR-misuse of-As stated in the 'CEQA-program EIR' portion of this comment letter, the current DEIR does not comply with the requirements of CEQA for a program EIR. The document takes the approach of doing as little as possible to give the appearance of compliance, but the document falls far short. A new revised EIR needs to be prepared. 68

Project alternatives in DEIR-None of the DEIR project alternatives comply with the scoping request for an on-site, safe-yield project alternative. None of the alternatives can comply with the requirements established for the reuse plan in SB 899. 69

The DEIR alternatives to the preferred project were literally designed to be flawed. As an example, Alternative 6R does not have the "*comprehensive set of policies and programs which reduce the potential impacts*" [DEIR pg 2-7].

Or, on the other hand, brand new so-called "*project objectives*" are created so that the supposed "No Project Alternative" "*would not meet the project objectives of developing an economic/employment recovery to compensate for base closure and accommodate regional growth*" [pg 2-6] The "no project" project creates "only" 26,000 jobs [pg 6-16] But the Army peak employment was 20,000 [Vol 2 pg 4-83].

If the DEIR alternatives were known to be not feasible, given the authors' criteria, why were they included in the EIR?

The failure to provide reasonable and feasible project alternatives is a fatal flaw. The failure to design an alternative to specifically reduce or eliminate the impacts of the preferred project renders this DEIR inadequate.

Reasonably foreseeable future projects in the project area-omitted data- 70

The DEIR discussion of reasonably foreseeable future projects begins in pg 5-1. The 1,793 sand dune hotel room/condo units contemplated by Marina for west of Hwy 1 and Reservation Road are omitted. If the 1,900 SF and 1,100 MF DU, golf course, 300-room hotel and 200 acres of business park is the Armstrong Ranch, it should be identified as such. None of this data is proprietary. It should also be stressed that the Armstrong project presented is only half of the land for potential development. The traffic generated will also be off Hwy 1 and Reservation Road. The City of Monterey is credited with 1.2 million sq.ft. of lt. ind./office park. Where is this located? Sand City's plans for 1,031 hotel rooms and 450 housing units are provided. The listing for Seaside omits the 6-story hotel planned next to the existing 12-story hotel and provides no specific details about Seaside's newly redefined redevelopment area. Corrections and additions must be included in a revised EIR. ✓

The reference to 1,246 DU "throughout Monterey County" [pg 5-2] is vague and needs to be defined with specific project names and locations. The 7/14/96 *Herald* had an article that provided up-to-date details about development along the Hwy 101 corridor, and, in or around Salinas. The projects have either been approved, are being built or are going through environmental review. A total of 13,225 units come on line in north, northeast, east of Salinas, River Road, Soledad and Chualar (Rancho San Juan, Harden, Williams, Sodenberg, Las Palmas, Miravale, Vista Soledad). The 1,246 DU mentioned in the DEIR may be included in the 13,225 but it is impossible to tell from the information provided in the DEIR.

71

The DEIR omits the discussion of cumulative impacts of the proposed Reuse Plan combined with the proposed 13,000 DU along the Hwy 101 corridor. The DEIR also fails to provide any current traffic analysis for Hwy 101. Perhaps we have discovered why there are two serious omissions in one DEIR.

A revised DEIR must use due diligence to discover relevant data and provide full disclosure of potential cumulative impacts.

Recycled/reclaimed wastewater-The 2/23/93 comments from Monterey County included in the Army FEIS Vol IV Jun 1993 pg 4-165 state "Many of the potential mitigations violate existing public health standards...should address the public health impacts that would result from the use of unlined sewage ponds, gray water and dual water-wastewater systems, as well as the hazards of using septic systems of toxic contamination...should more thoroughly discuss the feasibility of using and expanding existing sewage treatment systems instead of connecting to the regional system."

72

The Army EIS clearly stated that the reuse and impacts of that reuse and the mitigations needed to lessen the impacts is not an Army responsibility. The issues raised in 1993 still need to be answered adequately. The DEIR presents PPs to study and coordinate with agencies in order to vaguely address some of these concerns.

Where are the County issues specifically addressed in the DEIR? Of the 18,262 AF of water needed for the proposed project, 3,330 AF "could be supplied from reclaimed" wastewater. 3,330 AF is a huge amount of water (reclaimed or not) and is the approximate amount of potable water used by Carmel and Pacific Grove in a year.

Once again this DEIR asks FORA to approve a reuse plan and allow others to hopefully study the issues later. The DEIR is not adequate.

The three so-called mitigations found on DEIR pg 4-41 illustrate how the mitigation measures proposed in this DEIR require actions that are already required by law, e.g., "Mitigation: Write a program to be adopted...[to] comply with AB 939...[S]hall...comply with State of California Water Well Standards...Write a program to be adopted by the Cities..and County...to ensure that distribution and storage of potable and non-potable water comply with State Health Department..."

Senate Bill 899-SB 899 is an important guide to the reuse of the former Fort Ord. A copy of its full text should have been included in this DEIR for reference and so that FORA members, FORA staff and consultants, and the public would all understand what

73

the FORA board is supposed to be and what the reuse plan shall include. A copy of its full text must be included in the next EIR. See other discussion in this comment letter about the SB 899 goals and requirements for the Reuse Plan.

It should be noted that SB 899 states "powers and duties granted to the [FORA] authority by this title shall prevail over those of any local entity."

School siting (K-12)-Are any former Army K-12 schools removed in this plan? How many K-12 sites are provided? This is supposed to be a 50-year plan, given the recent incentives for reducing class sizes in the lower elementary grades, would it be prudent to set aside additional lands for K-12?

74

Seismic-The next environmental document should examine the seismic issues with greater detail. DEIR pg 4-59 states that 8,000 buildings need "substantial modifications" to meet seismic code, but the document tells us nothing as to the need to retain any of these structures, or whether some, in fact, are important to upgrade.

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Is Marina's 200 foot setback from the fault line that lies under Reservation Road sufficient? [Vol 2 pg 4-253]

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The DEIR states that the highest potential for ground failure and landslides is in the "eastern zone" [Vol 2 pg 4-251]. What is the eastern zone and is any development planned?

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Given the seismic map in Vol 2 Figure 4.6-1, the next EIR should take a close look at reducing or eliminating new development in polygons 5a, 9b, 7b, 7a, and 24. The proposed desal plant needs to identify an alternate building site east of Hwy 1.

78

Shared revenue stream-SB 899 states that the [FORA] "board shall consider a program of local revenue sharing among the member agencies to ensure an equitable apportionment of revenues generated from the reuse of Fort Ord..."

79

Since the Reuse Plan must be downsized to reasonably address the existing infrastructure constraints and the concerns about maintaining the quality of life, areas of the base that are in close proximity to the UXO fields or other identified toxics should be avoided. So, as an example, the City of Del Rey Oaks, that has insufficient city revenues to take care of their current needs, could receive a revenue stream from the development that occurs elsewhere. This would eliminate the fiscalization of land use mentality that is currently driving this City to consider development of a hotel, golf course and office park on parcels that are too small, infringe on the frog pond, are too close to the UXO fringe, and would be located in an area with current traffic problems.

A revised DEIR should closely examine the advantages of revenue sharing to reduce unneeded development but assist a city that is in true financial hardship.

Spheres of influence-peculiarities and conflicts-The DEIR Figure 3.6-1 entitled "Sphere of Influence and Annexation Requests" reflects the turf war that has gone on since the base closure was announced. The document explains that no requests will be handled by LAFCO until the Reuse Plan is adopted. The inclusion of the map for

80

information purposes is welcome, however, it must be stated clearly that when FORA certifies an EIR and adopts a Reuse Plan, that FORA is not sanctioning the confusing mess found on the Sphere of Influence map. Is Seaside still requesting a sphere that extends far into Monterey Bay? Is Seaside still thinking about a "cruise ship pier" referenced in the 2/12/93 Coastal Commission comment letter in the Army FEIS Vol IV Jun 1993 pg 4-45?

Stable, finite project description-lacking-The DEIR is replete with language that allows "flexibility" to meet the demands of the market place. The members of FORA that will receive land for development must understand that the entire purpose of a reuse plan is to use it or thoughtfully amend it from time to time. But the reuse plan must be stable and finite at the time of approval. 81

The use of the Pink Polygon technique creates the likelihood that the project description is evolving at this very moment.

The lack of identification of water supplies and the strategy of re-using the existing on-site road alignments or "wiping the slate clean" of parts of the existing on-site road system [Vol 2 pg 4-95] are examples of how this DEIR approves of, and encourages, the lack of a stable, finite project description. FORA members and the next EIR author must come to some reasonable understanding about this subject, being mindful of both CEQA guidelines and SB 899.

Stormwater runoff-lack of characterization/dune outfall pipelines- 82

The DEIR does not include any information about the baseline characteristics of the stormwater or sediment that results from the use of the outfall pipelines. The California Regional Water Quality Control Board requested sampling in their letter dated 2/19/93 in the Army FEIS Vol IV Jun 93 pg 4-89.

Data should have been collected several times a year (e.g., priority pollutant list). Has Army or their agents collected this data? If so, the results must be included in the next EIR.

The EIR offers no specific direction about the need to destroy and replace the stormwater disposal pipeline system.

The Threat-As a part of the DEIR review process FORA staff made presentations to FORA board members. At a Carmel City Council meeting on 7/11/96, FORA staff stated that if the current proposed reuse plan was not approved, that Army would sell the land for private development without a reuse plan in place. 83

The DEIR beginning on pg 6-16 states "*The No Project Alternative would occur if the former Fort Ord was unable to adopt a reuse plan.*" It then goes on to describe the 34,000 person city, with 10,000 DU, creating over 25,000 jobs in office parks etc., needing 9,300 AF of water. It stresses that no habitat management plan would protect the endangered species, and so on. ✓

A request has been made more than once at DEIR hearings to provide written documentation from Army that Army would sell land to developers. No data has come forward.

This important issue must be clarified in the next EIR. It's understood that the parcels that have transferred without a reuse plan in place have been unique, e.g., the McKinney non-profits, lands to UC and CSU, the airport because of federal agency sponsorship. Another unique situation is the special federal legislation that involves the golf courses and a certain amount of land contiguous to the existing golf courses, that could potentially allow Seaside to get those properties. Building out all of this will certainly have a significant civilian reuse presence, but no evidence is provided in the EIR to convince the reader that the Army would, in fact, sell land to private developers with no reuse plan in place. SB 899 would seem to prevent that from occurring. Please comment.

Toxics-The Army FSEIS released in Sept 1996 states "Additional development adjacent to the inland ranges would increase potential for exposure to ordnance and explosives" [pg ES-5]. This warning was made about the 12/94 Fort Ord Reuse Plan that had 13,000 DU and 25 million sq.ft. of office park and retail.

The DEIR project reduces the office and retail to 14 million sq.ft. but the housing units increased to over 22,000. And, the current plan spreads housing units more widely on vacant land so that more houses are in closer proximity to the UXO fields and other toxic sites. An example is polygon #24.

A reduced project is needed to reasonably address the existing water and traffic constraints, and it is suggested that the first projects to eliminate are those that are in proximity to identified hazards (or in the case of the landfill golf course, on one).

It is suggested that the County Environmental Health Department could work with Army and its agents to identify now, the least preferred lands for development. BLM is the likely recipient for additional parcels.

Traffic-The DEIR does several startling things with the issue of traffic. It allows the existing roads to remain in place or it allows the "slate to be wiped clean" [Vol 2 pg 4-95]. Of the traffic volumes that it does analyze, it ignores the project's impact on the already over-burdened Hwy 101. To add insult to injury, it also omits reasonably foreseeable development on Hwy 101.

Another fatal flaw in this DEIR is the lack of any analysis of the impacts of constructing the numerous new and expanded roadways. The EIR should summarize the numbers of miles of new roads needed for the 2015 plan, see DEIR Figure 4.7-3. The EIR should also give some description of the new freeway interchanges that are required. It's also understood that Cal Trans may have indicated years ago that the 12th street interchange may not be feasible. The EIR should have provided FORA and the public with some reasonable data on the existing constraints that seem to exist in the path of the Hwy 68 by-pass, i.e., erodible soils, 30% slopes, environmentally sensitive habitat and proximity to, and route through, the UXO fields [data extracted from Army EISs].

The EIR author states in Vol 2 pg 4-118 that the reuse plan approach to traffic planning for the future is to "not over supply infrastructure oriented to the use of the automobile." This sounds more like a method to keep the developer fees low.

87

2015 plan-see DEIR pg A-32 "Summary Land Use Concept: 2015 Scenario"

88

DEIR pg A-32 provides the following data about the 2015 plan: 3,800 CSU DU, 1,600 POM DU, 7,900 FORA DU for a total of 13,300 DU [Ord had a total of about 6,000 DU]; 3.9 million sq.ft. office/lt industrial; 1.1 million sq.ft. retail; 1,000 hotel rooms; 4 golf courses; and "public facilities"; which will "create" 18,000 jobs. Total population is said to be 39,000 persons [does not include CSU build-out to 25,000 full time equivalent students]. The DEIR does not make it clear where any of the proposed FORA development would occur on the base.

DEIR pg 4-42 states that the 2015 plan would need a total 8,421 acre feet water supply, i.e., 6,469 AF potable and 1,952 AF potable. The potable water use seems very optimistic. No costs are estimated for the water supplies since no sources are identified.

89

The traffic demands triggered by the 2015 plan is found on DEIR Figure 4.7-2. It must be stressed that TAMC held an information meeting in March 1996 and the *Herald* reported on 9/25/96, that the costs to build the road improvements found on Figure 4.7-2 are estimated to be \$800 million (\$200 mil on-site and \$600 mil off-site).

DEIR pg 2-5 states "That initial phase of development to the year 2015 would not result in a growth inducing impact." No substantial evidence is provided to affirm this opinion. The statement must be deleted from further consideration.

90

FORA has hired a public relations firm that distributes a news letter, "FORA update/news". In a piece handed out at the 7/1/96 hearing, it's stated that the so-called 2015 plan (that builds out to use about 8,400 AF [DEIR 4-42]) is not growth inducing because it's "only a recovery to approximately the levels present in 1991" [the baseline data year used by the DEIR and the last full year of Army operations]. The DEIR states on pg 5-3 that the so-called 2015 plan would have a population of 39,000. It is unclear, however, how many of the 39,000 are students of CSUMB, so the population estimate may be low.

91

It must be stressed that the public services and infrastructure required by a civilian city, and a civilian work population will be much greater than the "peak military employment" and base residents. The DEIR fails to provide any substantial evidence that allows the public to believe the opinions presented by the FORA consultant.

92

It serves as an example, however, how the public is being misled about the impacts of the proposed reuse plan: first, the civilian reuse is equated with the past military activities; second, the public is being misled about the "need to recover"; third, the public is being misled about the ability to supply infrastructure for the so-called 2015 plan; and fourth, the public is being misled about the ability to simply stop the reuse plan at any arbitrary point.

The Oct 1996 FORA newsletter, that was distributed at the 10/7/96 DEIR hearing states "Although the Reuse Plan is designed as a 20-year plan, it discusses the land capacity and forecasted market absorption for the former Fort Ord that extends 40-60

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years into the future." The 10/4/96 *Monterey Times* headlined "FORA head says growth won't occur without adequate roads, freeways" explains that "If there aren't ways (or funds) to make improvements, the project stops dead in its tracks."

To further confuse the reader's analysis of the DEIR and proposed reuse plan, are comments made by the EIR author at the 8/7/95 DEIR public workshop where he stated that the general plans that will be adopted by the cities and the county, relying on this reuse plan, will use the 2015 plan. It was also stated by the FORA consultants that the 2015 plan places 85% of the land into development, and that "only" 1/3 of the water will be used. Please clarify. Where in the DEIR or accompanying documents is it clearly stated that the general plans for the cities and county will be the 2015 plan? 93

And, if it is true that the general plans will reflect "only" the 2015 plan, what is a developer buying when he buys a piece of land? Will it be the densities created by the 2015 plan or the higher densities created by the proposed Reuse Plan? Please clarify. 94

We return to the subject of land sold to developers by government, for which there is no infrastructure: what legal mechanism is provided in the DEIR to prevent this from occurring? 95

Finally, if FORA or its agents attempt to use the 2015 plan as the preferred project alternative for the reuse plan, all reference to the current reuse plan must be deleted from consideration. A new environmental impact report would be needed to adequately describe the project, and its environmental impacts. The project description would have to include, of course, the numbers of housing units; sq.ft. of office park/retail, hotel rooms, golf; the project requirements for water, wastewater and traffic, the source(s) of water, and the environmental impacts of developing and operating the project infrastructure. In other words, the DEIR must analyze a stable, finite project description.

UCMBEST-The University of California MBEST center is indistinguishable on the polygon map DEIR Figure 3.2-1. A revised DEIR needs to make the boundaries and purposes clear for this major component of base reuse plan. When is the UC master plan ready? Please include it in the next EIR. 96

UXO and toxic hazards-The next EIR should provide an accurate up-to-date of the identified hazard areas that is overlaid on top of the proposed reuse plan. Please see other references in this comment letter. 97

Undevelopable acres-Please see the 2/12/96 scoping request #23 for a polygon by polygon matrix that would address existing constraints on future development. Please add environmentally sensitive habitat, proximity to toxic and/or UXO sites. 98

Viewshed protection-The Army DSEIS Dec 1995 pg 5-85 stated that "the regional urbanization high intensity land uses degrade the visual quality of the Monterey Bay shoreline...reduce the visual quality from the Salinas valley...[the plan will] alter the visual character of the area." 99

The reuse plan must respect and protect the natural beauty that presently exists on the base. It's understood that BLM has established that aesthetic effects are significant and have created objective standards on visual resource management systems. Consideration must also be given for the view of the former base from the Pacific Grove and Monterey side of the bay (when the fog isn't in).

Wastewater treatment capacity-lack of/no environmental assessment-

The wastewater demand created by this plan is estimated to be 11,000 AF [DEIR pg 4-40]. The regional treatment plant operated by the Monterey Peninsula Water Quality Control Board has a permit to treat 8,000 AF more than their current flow. This means that if the Ord Reuse were to take all remaining capacity, there would still be a 3,000 AF deficiency. This is not stated in the EIR but can be computed by research and hunting through the DEIR.

The *"need for additional improvements"* would be *"evaluated and necessary improvements would be implemented on a project by project basis"* [pg 4-40].

This is not adequate under CEQA. The need for a sub-regional plant is known today and the environmental impacts of the new project must be identified and mitigated now.

It should be noted that the MRWPCA plant will be upgraded to 33,000 AF capacity, but that given the current flow of 22,000 AF, the Ord project would essentially take all that capacity. This would preclude increased flows from the existing 12 member cities. This is not realistic and is not addressed in the DEIR.

In addition, the DEIR leads the reader to believe that it is feasible to use the wastewater treatment facilities at East Garrison [pg 4-36]. This is misleading. See Army DEIS Dec 1992 Vol I pg 4-45 and FEIS 1993 Vol IV pg 4-262.

Water-no DEIR environmental analysis of e.g. "water importation" and desal

The DEIR is grossly inadequate regarding current water conditions in the project area. The draft EIR does not inform us about current pumping, the status of seawater intrusion or the safe-yield for the base.

Requests were made during the scoping period for up-to-date data regarding the status of seawater intrusion reportedly underlying the base in the 180' and 400' aquifers. No information is provided. As far as the public knows, the last data made available was in the December 1990 DEIR/S for the Sea Water Intrusion Program, pg S-4, Figure S-2, reflecting data recorded in 1985. The document stated that "assuming a rate for seawater intrusion at the base of 500 feet per year, a new well field would be adversely affected in 15 years [the year 2005]."

An unsubstantiated opinion is given on DEIR pg 4-45 that seawater *"intrusion has slowed if not stabilized."* Data must be provided to verify the comment.

It's understood that Army has many wells throughout the base for toxic monitoring purposes. Chloride data needs to be collected from appropriate wells and must be included in a revised draft EIR. A map should be created showing the well

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10/11/96

locations, the depth of the wells, the depth to groundwater and/or the perforation of the casing (adjusted for sea level), the date of the sample, etc.

The seawater intrusion in the Salinas Valley basin has been repeatedly characterized as a "crisis" over the last few years. In 1991 and 1992, public hearings were held for a proposed Spreckels pipeline that cost \$33 million to provide so-called "replacement water" in the amount of 16,000 AF for Marina and Fort Ord. The project was not approved; it did not survive the CEQA/NEPA review process. FORA is now asked to approve a 72,000 person city over an area known to have water quality and water quantity problems.

Requests were made during the scoping comments for up-to-date data regarding safe-yield for the base. The Army DEIS Vol I Dec 1992 pgs 4-57, 58,59 states in part "...This indicates that [safe yield] may be less than the total pumpage of 4,700 acre-feet per year. The Army DSEIS Dec 1995 pg 4-8 states that Army's water use averaged 5,100 AFY during 1986-1989 and was 3,235 AF in 1994. The DEIR states that *"...recent pumpage in former Fort Ord exceeded safe yield in the 180-foot and 400-foot aquifers, as is indicated by seawater intrusion..."* [pg 4-46]. The DEIR contains no information about safe-yield for the base.

Scoping comments requested pumping data for a one year period since the military base closure. The DEIR provides no data on current use. It's understood that current use may be around 3,000 AFY. If this is true, good information needs to be generated to determine, given the small residential population, whether the water is being wasted or vanishing due to severe line-loss.

An adequate EIR would have revealed this important data. Instead the EIR leads the reader to believe that a full unused 6,600 AF of water awaits FORA's reuse plan [pg 4-42]. This simply is not true.

Monterey County residents are told by State and local water agencies that there is a seawater intrusion crisis, a water distribution problem, that farm operations must conserve, that existing residents must conserve, that there's a critical water shortage, that part of the water taken from the Carmel River must no longer be taken. The DEIR states *"the regional water supply shortage would not be solved by the proposed project."* The reader concurs.

Since safe-yield is said to be 4,700 AFY and current use is about 3,000 AF, it would appear that FORA is being asked to certify an EIR and adopt this project that needs 18,000 AF—with as little as 1,700 AF available on site.

To put 18,000 acre feet into perspective, the entire Monterey Bay area will use about 20,000 acre feet this year.

The DEIR makes the astounding assertion that *"Because a number of reasonable, new water supply sources have been identified...the increased demand for the water [is] a less than significant impact at the project level."* [pgs 4-43, 44]. The DEIR also states *"cumulative development would increase the demand for water distribution services and would be mitigated by the capital improvements and policies and programs. The cumulative demand for these services would not be considered a significant impact."* [pg 5-4]

The fatal flaw in this DEIR is its use of twenty-five words to supply all the details needed to understand how 18,000 AF of water will be created. The *"reasonable new water supply sources....being considered include an on-site desalination plant, on-site recharge ponds, on-site storage facilities, and the importation of water from other sources."* [pg 4-42]

The DEIR provides no information about what type of water is to be recharged, in what manner, or for what purpose. The phrase "on-site storage facilities" does not describe what type of water is to be stored, in what manner, and for what purpose. Vol 2 pg 4-158 says that the future selection of reservoir and water impoundment areas could *"preclude [urban] development."* If infrastructure needs to be sited that would preclude houses, golf courses and business parks, the time to preclude proposed development is in the reuse plan preparation.

103

The phrase *"importation of water"* receives no clarification in the DEIR. The reader can assume that it means either a dam or a pipeline taking water from the fresh row crop farmlands. In November, 1995, voters refused financing for the \$283 million, 24,000 AF, New Los Padres Dam on the Carmel River. In 1992, the Board of Supervisors, with the concurrence of the Monterey County Water Resources Agency board, deleted from consideration a proposed \$33 million (without financing costs) Spreckels pipeline. The DEIR fails to use good faith in fully disclosing the method of "importing water," the source of the water, and the environmental impacts of the systems and the extraction of that water.

104

The DEIR also fails to notify the non-Reuse Plan residents and farmers that have been asked in the past to pay for 80% of the proposed pipeline and proposed dam. A scoping request was made for a map showing the boundary for the Monterey Peninsula Water Management District that extends onto the base and includes much of the proposed development area; it is not included in the EIR. It is felt that a desal plant is the least likely water solution for Ord, as the costs should be born solely by the newcomers to the Reuse Plan project area.

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If no dam is built on the Carmel River, and if no more that 6,600 AF is taken from anywhere in the Salinas Valley basin (as per the MOU between the Army and Monterey County Water Resources Agency) and if 3,000 AF of the total need for 18,000 AF is reclaimed water, this leads to the following conclusion: a desal plant must yield over 8,000 acre feet. This would be the first and only plant of that size in the United States and we would be the first and only area to build a desal plant to create growth of a city.

107

The DEIR does not tell how much water the plant needs to produce. It does not provide a specific location west of Hwy 1 for the plant. It doesn't describe how large the building needs to be, whether large power lines are needed, what its outside lighting requirements would be. It doesn't describe the compatibility with the future State Park that will receive the sand dunes. It doesn't indicate whether a large storage reservoir would be needed to service peak demands.

The DEIR informs us about the high potential of seismic and liquefaction hazards [[Vol 2 Figure 4.6-1 and pg 4-251]. This would convince the reader that the sand dunes

108

are an undesirable location for this vital utility plant. There is no data about the need or feasibility of a power back-up system in case of a prolonged power outage, like the three days following Loma Prieta earthquake. No data is provided regarding requirements for emergency storage facilities for both potable and fire-fighting capability given a prolonged power failure, or a prolonged period of operational down-time that is known to occur with small existing plants in the United States.

No information is provided regarding the outfall and intake lines: for example, whether they would be allowed in the National Marine Bay Sanctuary; or whether there is space to construct Raney collectors and outfall pipelines underneath the beach. No data is provided from Cal Trans to assure their support for construction of transmission lines to the east side of Highway 1.

The EIR is inadequate.

There is an immediate need to accurately estimate the future water needs for the full build-out of the land that has already been transferred. A reality check may be in order. The uses would include, POM, CSUMB, UCMBEST, the airport, the two existing golf courses. Add then, the next-in-line, i.e, the retirement project, the Hayes housing area, and Patton, and do the math again. Then consider what is currently known about the safe-yield. The base may be essentially built out until the existing water system deficiencies are remedied.

The Army FSEIS released in Sep 1996 states that a "silty aquitard in the 180-foot aquifer" has been discovered. [pg 4-12] What is a silty aquitard? What portion of the 180' aquifer contains it? Who discovered it? When was it discovered? Is its existence significant? If it is significant, is it discussed in the DEIR? If not, please address the issue in the next EIR.

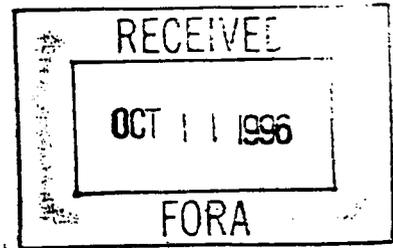
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Ms. Anne Hebenstreit
Fort Ord Reuse Authority
100 12th Street Bldg. 2880
Marina, CA 93933



SUBJECT: Fort Ord Reuse Plan/EIR
Proposed Transportation Network

Dear Ms. Hebenstreit:

This letter is to request clarification and to make comments on the proposal to locate roadways adjacent to existing residential development along the City of Marina east and south boundaries.

Roadway Along Marina South Boundary

Please refer to Figures 4.2-2, 4.2-3, and 4.2-7 of Volume 2 of the EIR. Figure 4.2-7 shows a 100-foot right-of-way (ROW) along the southern boundary of Marina between the Crescent Avenue extension and the southeast corner of Marina. The transportation model in Figures 4.2-2 and 4.2-3 shows that a collector along the city boundary is unnecessary (these comments are repeated at the end of this letter).

My concern is that a 100-foot ROW along the existing City boundary could accommodate a four-lane collector, which could potentially affect 100 existing homes along this alignment. Many of these homes would be placed in the undesirable position of having a road in the front and back yard. No analysis of the impacts from building such a collector adjacent to existing homes has been made. Potential impacts to existing residents include drainage problems, slope stability problems, increased trash, increased noise, increased air pollution, and increased vandalism. The prevailing winds (from the southwest) would exacerbate the impacts from noise, air pollution, and trash. An increase in air pollution (essentially, auto and truck exhaust) would be particularly onerous for the many elderly and retired persons living along this boundary.

In addition, there are several sensitive plant species along this boundary that would be affected by development of this collector (see Appendix F, "Flora and Fauna Baseline Study of Ford Ord, California," prepared by the U.S. Army Corps of Engineers, December 1992). Real estate agents I have spoken with have said such a road would cause a 10% drop in property value.

If the existing multi-family housing is to be retained adjacent to the south boundary, construction of this collector will be difficult, if not economically impossible, due to significant grade differences in the area adjacent to Sunrise Place. In this area, there is not sufficient room between the Fort Ord buildings and existing residential property to place a collector road and there may not be enough room for a street. ✓

Apparently, a road along the south boundary of Marina has been proposed by the City of Marina in the past. It is clear that transportation planners have been looking for a "Marina bypass" to relieve congestion in Marina due to traffic between the Monterey and Salinas areas. Improvements to Imjin Road should provide this bypass; however, the current proposed, virtually straight, alignment of the road along the south boundary would also provide another bypass. To prevent this possibility, the route should be more circuitous between Highway 1 and the southeast corner of Marina. This is a residential area, where through traffic should be discouraged.

Roadway Along the East Marina Boundary

As shown in the 2015 and Buildout Transportation Networks, a two-lane collector is proposed along the east boundary of Marina. No impact or alternative analysis of this proposal is presented. Impacts from this proposed road would be similar to the impacts of locating a road adjacent to the south boundary. An analysis of impacts would likely generate an analysis of alternatives. A feasible alternative could be to relocate the roadway away from existing development and place the road in the existing utility corridor located to the east of the proposed roadway alignment.

If this area is to remain residential, a new roadway adjacent to an existing residential area is usually an inefficient use of land. Placing new residences adjacent to existing residences normally reduces the total amount of roadway needed to service the new area and increases the amount of residences that can be built on a parcel.

Transportation Network Discrepancies

1. The proposed 2015 Transportation Network shown in Figure 3:5-1, page 3-65, Volume I of the Ford Ord Reuse Plan (FORP) and the Buildout Transportation Network, Figure 4.2-3, page 4-99, Volume II, show a two-lane collector between 12th Street/del Monte in Fort Ord and Reservation Road along the Crescent Avenue alignment. The Roadway Classification and Multimodal Corridor, Figure 3.5-2 on pages 3-69 and 3-70 show the California Avenue connection (unlabeled), but does not show the Crescent Avenue extension. The Transportation Right-of-Way Reservations, Figure 4.2-7 on pages 121 and 122 in Volume II, does not show a ROW for the Crescent Avenue extension. Figure PFIP 1-3, page PFIP 1-50, Business and Operations Plan shows the connection to Crescent Avenue and assigns a T-14 and T-39 completion priority. These figures are inconsistent.

2. A collector road is shown on Fig. 3-5.2 connecting 2nd Ave/del Monte with Imjin Road. The proposed alignment is generally along the former south city limit. This proposed alignment does not appear in the 2015 or Buildout Transportation Networks shown in Figures 4.2-2 and 4.2-3 in Volume II. In addition, Figure PFIP 1-3, page PFIP 1-50, does not show a roadway along this alignment. A 100-foot ROW is shown along the former south city limit in Figure 4.2-7. If the Buildout Transportation Network figure is correct, a 100-foot ROW is unnecessary along the former south city boundary.

Prior to dedicating any ROW for roadway development along the City of Marina boundaries, the FORA should investigate the impacts, alternatives, and mitigations for locating such roadways. These analyses should be made available to the residents along the Marina City boundary. None of the residents I spoke with at 26 homes along the south boundary of Marina knew of the proposal to place a roadway adjacent to their homes. In part, this may be due to the discrepancies cited above. Because residents on this boundary would be directly impacted by construction of a roadway in their back yards, FORA should advise these residents of any such proposal.

5

Sincerely,

Larry Hampson
476 Sunrise Place
Marina, CA 93933
384-2541

338-3



Established 1908

Monterey Peninsula Chamber of Commerce

Including • *Big Sur* • *Carmel-by-the-Sea* • *Carmel Valley* • *Del Rey Oaks*
• *Marina* • *Monterey* • *Pacific Grove* • *Pebble Beach* • *Sand City* • *Seaside*

October 11, 1996

Board of Directors
Fort Ord Reuse Authority
100 12th Street, Building 2880
Marina, CA 93933

Subject: Fort Ord Reuse Plan and Draft Environmental Impact Report

Dear Board Members:

The Monterey Peninsula Chamber of Commerce has reviewed the Draft Fort Ord Reuse Plan and Environmental Impact Report and respectfully submits the following comments for your review:

1. The Monterey Peninsula Chamber of Commerce urges a thorough consideration and exploration of a project alternative in which planned development is based upon existing infrastructure and water constraints. This would eliminate the need for many of the proposed mitigation measures, whose full and adverse environmental impacts have not as yet been addressed as required by CEQA.

2. The Chamber of Commerce recognizes the importance of moderate and well-planned development for a healthy regional economy. Data within the Reuse Plan suggests, however, that jobs have not been as drastically reduced by the base closure at Fort Ord as was originally projected (20,000 projected job loss due to base closure/13,000 actual County-wide net job loss as of 1995) and a recent census shows that jobs in Monterey County are up and rising (The Herald, 10/8/96, 1C). This data suggests that a revised reuse plan which takes into account the County's current, healthier-than-expected economic and employment figures, would be not only more feasible to implement but also more in accordance with the County's needs.

3. The housing to jobs ratio has improved considerably in the latest revision of the Reuse Plan. However, the Chamber has found that the connection between this ratio and transportation issues has been oversimplified and inadequately addressed. A balance of available housing and available jobs, while desirable, will not necessarily reduce commute distances, traffic congestion and automobile emissions, unless -- as AMBAG suggested in its letter to the FORA Board dated August 20, 1996 -- incentives are developed to encourage persons employed in a given area to live within or very near said area.

P.O. Box 1591
380 Alvarado Street
Monterey, CA 93942

Administration: (408) 648-5360
FAX: (408) 649-3502



339-1

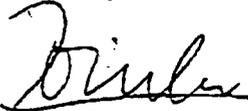
4. The Monterey Peninsula Chamber of Commerce shares many of the concerns previously submitted to the FORA Board members by the City of Carmel-by-the-Sea and Mayor Ken White on October 2, 1996. In particular, the potential consequences of insufficient funding for transportation improvements as necessitated by the current Reuse Plan. The profound inadequacy of existing sources of funding for such improvements will undoubtedly lead to retarded and/or environmentally unsound development. Sufficient and realistic sources of funding should be identified and ensured, or the Plan should be revised to place more realistic demands on available funds. 4

5. The buildup of the CSUMB and adjacent land will likely lead to a demand for a direct route between the University area and Highway 68 (circumventing Highway 1). The existing route, North South Road, is inadequate to accommodate the volume of traffic the projected buildup will certainly attract. The Monterey Peninsula Chamber feels that an alternate roadway will become necessary long before the year 2015 (as proposed in the Plan); either a separate route roughly parallel to North South Road or a substantial expansion of North South Road itself will be required. 5

The Monterey Peninsula Chamber of Commerce is committed to fostering a positive climate for economic growth on the Peninsula. While there are many elements of the Fort Ord Draft Reuse Plan which we find intriguing, we are strongly in favor of a scaled-down approach to base reuse, one based more solidly upon the realities of our constrained financial as well as natural resources and a less severe economic situation than was originally predicted as a result from the base closure. Such a Reuse Plan would entail less risk and yield higher long-run benefits to the Peninsula's businesses and citizens. 6

Again, thank you for your consideration of the points discussed herein and for addressing them prior to issuing a final EIR.

Sincerely,



Frank Geisler, President



copy rec'd +
postmarked - Oct 11

**MONTEREY PENINSULA
WATER MANAGEMENT DISTRICT**

87 ELDORADO STREET • POST OFFICE BOX 85
MONTEREY, CA 93942-0085 • (408) 649-4866
FAX (408) 649-3678

October 11, 1996

Ann Hebenstreit
FORA
100 12 th Street, Building 2880
Marina, CA 93933

SUBJECT: MPWMD COMMENTS ON FORT ORD REUSE PLAN DRAFT EIR

Dear Ms. Hebenstreit:

The Monterey Peninsula Water Management District (MPWMD or District) appreciates this opportunity to submit comments on the Draft EIR for the Fort Ord Reuse Plan (EIR). The District boundary encompasses roughly one-third of the potentially most populated area affected by the Reuse Plan. The MPWMD, through its State enabling legislation and a Memorandum of Agreement with the Monterey County Water Resources Agency (Attachment 1), has the responsibility to manage water resources in the Seaside Groundwater Basin. Specifically, Addendum No. 1 (page 2, Agreement No. 3 (b)) dated February 17, 1993 states:

The MPWMD shall have the exclusive authority to regulate the management of the Seaside groundwater subbasin within the present Fort Ord boundaries, and the MCWRA will comply with any such ordinance enacted by the MPWMD.

An important general issue not addressed in the Draft EIR is the potential effect of approval of many new lots of record within the MPWMD boundary as part of the Reuse Plan. Presently, existing residents and businesses within the District suffer vulnerability to drought; there is inadequate water to serve existing legal lots of record; and roughly 70 percent of the water supply has been declared as being unlawfully diverted from the Carmel River by the State Water Resources Control Board. The District is concerned that there may be an expectation of immediate water service once the new legal lots are created as part of the Reuse Plan. Such an expectation is unrealistic given the need to first address the problems noted above.

continued

340-1

Ann Hebenstreit
October 11, 1996
Page 2

At public meetings before the MPWMD Board, citizens have raised concerns that the Ford Ord Reuse Plan EIR does not address a development alternative tied to the safe and sustainable yield of the water resources system. Specifically, the Ventana Chapter of the Sierra Club has requested that the EIR include a "reasonable" growth alternative that is constrained by on-site water resources and results in no increase in the current rate of seawater intrusion (Attachment 2). Serious consideration should be given to analysis of this type of alternative in the Final EIR. 2

Other comments by the District are provided in Attachment 3. Thank you for your consideration of the comments by MPWMD. If you have any questions, please contact Joe Oliver or Stephanie Locke of our staff. They can be reached at 408/649-4866.

Sincerely,


Darby W. Fuerst
MPWMD General Manager

attachments

cc: District Board
M. Armstrong, MCWRA
A. Mitteldorf, Sierra Club

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340-2

Before the Board of Supervisors in and for the County of Monterey, State of California

Agreement No. A-06181 --)
Amended Memorandum of Agreement with)
Monterey Peninsula Water Management)
District and Pajaro Valley Water)
Management Agency Regarding Exercise)
of Jurisdiction in Overlapping)
Territories, Approved; Chair Authorized)
to Sign)

RECEIVED
AUG 24 1993
M.P.W.M.D.

Upon motion of Supervisor Perkins, seconded by Supervisor Strasser Kauffman, and carried, the Board hereby approves an amended Memorandum of Agreement (Agreement No. A-06181), with the Monterey Peninsula Water Management District and Pajaro Valley Water Management Agency regarding exercise of jurisdiction in overlapping territories, together with a revised Addendum No. 1 to the MOA.

PASSED AND ADOPTED this 25th day of May, 1993, by the following vote, to-wit:

AYES: Supervisors Pennycook, Shipnuck, Perkins, Karas and Strasser Kauffman.

NOES: None.

ABSENT: None.

I, ERNEST K. MORISHITA, Clerk of the Board of Supervisors of the County of Monterey, State of California, hereby certify that the foregoing is a true copy of an original order of said Board of Supervisors duly made and entered in the minutes thereof at page ___ of Minute Book 67, on May 25, 1993
at May 25, 1993

ERNEST K. MORISHITA, Clerk of the Board of Supervisors, County of Monterey, State of California.

340-3
Rv Nancy Lukensell

AGREEMENT NO. A-06181
MEMORANDUM OF AGREEMENT BETWEEN
THE MONTEREY COUNTY WATER RESOURCES AGENCY,
THE MONTEREY PENINSULA WATER MANAGEMENT DISTRICT AND
THE PAJARO VALLEY WATER MANAGEMENT AGENCY

This is a memorandum of agreement between and among the Monterey County Water Resources Agency (MCWRA), the Monterey Peninsula Water Management District (MPWMD) and the Pajaro Valley Water Management Agency (PVWMA). Its date for reference purposes is December 15, 1991.

RECITALS

This memorandum of agreement is entered into in light of the following facts:

A. The Legislature of the State of California has created the three water management agencies who are parties to this memorandum of agreement. All are located wholly or partially in Monterey County, with overlapping territory and with many similar powers: the territory of the MCWRA is coextensive with the territory of Monterey County; the MPWMD includes the Monterey Peninsula and Carmel Valley areas and is entirely within the territory of the MCWRA; and a portion of the PVWMA is located in north Monterey County and therefore is within the territory of the MCWRA.

B. In order to prevent any conflicts that might otherwise occur as a result of this overlap, to encourage and facilitate cooperation with one another, to insure that resource management efforts are not inappropriately duplicated, and to insure that public funds are used effectively, the parties enter into this memorandum of agreement.

AGREEMENTS

COOPERATION AMONG AGENCIES

1. Cooperation among agencies. In all matters in which there is a joint interest, the agencies shall cooperate with one another to the maximum feasible extent.

2. Meeting agendas and reports. (a) The MCWRA will provide to each of the other agencies a copy of the agenda for each meeting of the Monterey County Board of Supervisors at which the board will act in its capacity as MCWRA Board of Supervisors. If a managing board of directors is established for the MCWRA, the MCWRA will also provide to each of the other agencies a copy of the agenda for each meeting of the board of directors. The MPWMD and the PVWMA will each provide to the MCWRA the agenda for each meeting of their respective boards of directors. In each case the agenda will

(MPPVWRA.MOA - 12/15/91)

be provided to the manager of the respective agencies as soon as it is available for public distribution, by fax or by other prompt means of delivery.

(b) If the manager of an agency desires a copy of any report prepared by another agency for any of its public meetings, he or she may request the same by phone, and a copy will be faxed, mailed, or otherwise delivered promptly.

(c) The manager of each agency will provide to the other agencies copies of environmental documents and technical reports, whenever it appears that such documents will be of interest to such other agency.

3. Quarterly managers' meetings. The managers of the three agencies will meet on a quarterly basis, or more often as needed, to discuss matters of common interest to the agencies.

4. Joint meetings of governing bodies. The governing bodies of the three agencies may hold joint meetings as needed.

FLOOD CONTROL ACTIVITIES

5. Flood control and drainage activities. Among these three agencies, the MCWRA shall have primary responsibility for flood control and drainage activities in the County of Monterey. When the MCWRA's activity is related solely to flood control and/or drainage control, the MCWRA may undertake public works projects, acquire property, create zones, raise revenues from areas benefited by the flood control and/or drainage control activities, and exercise its police powers in any part of its territory, including territory within the other agencies, without obtaining the consent of the other agencies.

WATER SUPPLY PROJECTS

6. Other agency consent for MCWRA projects. Except as otherwise provided in this agreement, the MCWRA will not undertake water supply projects in the territory of either of the other agencies without first obtaining the consent of the affected agency.

7. MCWRA activities outside territory of other agencies, with incidental activities within territory of another agency. When the Water Resources Agency's activity is solely for the purpose of meeting the needs of or benefiting persons and property outside the territory of the other agencies, the MCWRA may, without obtaining the consent of the other agencies, undertake public works projects and acquire property in any part of its territory, including territory within the other agencies, provided that such

(MPPVWRA.MOA - 12/15/91)

activities in the other agency's territory are incidental to the authorized purpose of the activity and the primary facilities for the project (including any water resources) are located outside the other agency's territory.

8. Projects by MCWRA and MRWPCA. The MCWRA may participate in joint projects with the Monterey Regional Water Pollution Control Agency (MRWPCA) in any part of the MCWRA's territory, including territory within the other agencies, without obtaining the consent of the other agencies, when one or more of the primary purposes in such a project is to benefit property and persons outside the territory of the other agencies.

9. Notice of MCWRA water supply projects within another agency's territory. Whenever the MCWRA proposes to undertake an activity (other than an activity described in paragraph 5, above) in one of the other agencies' territory, the MCWRA shall give to the affected agency at least 10 days' notice by first class mail, or greater notice if otherwise required by law, in advance of any MCWRA meeting at which such action will be considered; provided, however, that if an emergency requires prompt action, the MCWRA will give such notice as it can under the circumstances, even though less than 10 days' notice, and even though other than by first class mail.

10. MPWMD and PVWMA projects outside their boundaries. Neither MPWMD nor PVWMA will undertake any project wholly or partially outside their boundaries in the County of Monterey without first obtaining the written consent of the MCWRA, where the activities outside the agency's boundaries include the construction of facilities, the acquisition of property, or the acquisition or use of water resources located outside the agency's boundaries.

11. Lead agency designation. If any project set forth on the list attached hereto as Exhibit A is proposed to be undertaken by any of the parties to this agreement, then the lead agency for carrying out such project shall be FVWMA or MPWMD, where so specified in the last column of that list (FVWMD on the list means FVWMA); otherwise, the lead agency shall be MCWRA. The affected parties may change the lead agency designation by separate written agreement.

WATER CONSERVATION REGULATIONS

12. Water conservation regulations. The MCWRA may enact water conservation regulations applicable in any part of its territory, including territory within the other agencies, without obtaining the consent of the other agencies. Such regulations shall not apply in the overlapping territory of another party if the other party has enacted and regularly enforces substantially similar or more restrictive regulations.

(MPPVWRA.MOA - 12/15/91)

TAXATION AND ASSESSMENTS

13. Other agency consent for MCWRA revenue-raising activities. Except as otherwise provided in this agreement, the MCWRA will not raise revenues in the territory of either of the other agencies for the purpose of financing water supply projects, without first obtaining the consent of the affected agency.

14. Agencies' shares of property tax revenues. This agreement does not affect the ability of any party hereto to continue to share in the collection of property tax revenues in accordance with such formulas as are now in effect or as may be hereafter established by state law.

15. Financing tertiary treatment plant. This agreement does not restrict in any way the ability of the MCWRA to raise revenues to finance joint projects with the Monterey Regional Water Pollution Control Agency (MRWPCA) for the construction, operation, and maintenance of a tertiary wastewater treatment plant, wherever such plant and its related facilities might be located, nor does this agreement restrict in any way the ability of the MRWPCA to raise revenues within its own territory for such a project.

GENERAL PROVISIONS

16. Term of agreement and cancellation. This agreement shall remain in effect indefinitely, until modified or canceled by the parties. This agreement may be canceled by one party after giving at least thirty days' notice in writing to the other parties.

17. Dispute resolution. If any dispute arises between or among the parties concerning the interpretation or application of this memorandum of agreement, staff for the parties shall meet and confer regarding the dispute. If the matter is not resolved through meetings at the staff level, the governing bodies shall hold a joint meeting to resolve the matter. Litigation may be initiated by a party only if such party has made a good faith effort, documented by correspondence with the other parties, to resolve the dispute in the manner prescribed above.

18. No third party beneficiaries. This memorandum of agreement is made solely between and among the parties hereto. No person shall be deemed to be a third party beneficiary of the memorandum, and no person shall have a cause of action or standing to enforce this memorandum or to assert non-compliance with its terms, except a party hereto.

(MPPVWRA.MOA - 12/15/91)

19. Not binding on County of Monterey. This memorandum of agreement is not made by the Board of Supervisors acting in its capacity as the governing body of the County of Monterey, and it is not binding on the County of Monterey.

IN WITNESS WHEREOF, the parties execute this memorandum of agreement as follows:

MONTEREY COUNTY WATER RESOURCES AGENCY:

Dated: May 25, 1993 By *John J. Lynch*
Chair, Board of Supervisors

MONTEREY PENINSULA WATER MANAGEMENT DISTRICT:

Dated: 15 APRIL 1993 BY *Fernando Perez*
Chair, Board of Directors

PAJARO VALLEY WATER MANAGEMENT AGENCY:

Dated: 7/14/93 BY *Edward Kelly III*
Chair, Board of Directors

Approved as to form:
William K. Rantz
Counsel for MCWRA
Dated: 5/6/93

Approved as to form:
Abigail Garcia
Counsel for MPWMD and PVWMA
Dated: April 7, 1993

ADDENDUM NO. 1 TO
MEMORANDUM OF AGREEMENT BETWEEN
THE MONTEREY COUNTY WATER RESOURCES AGENCY,
THE MONTEREY PENINSULA WATER MANAGEMENT DISTRICT AND
THE PAJARO VALLEY WATER MANAGEMENT AGENCY

This is Addendum No. 1 to the memorandum of agreement (MOA) between and among the Monterey County Water Resources Agency (MCWRA), the Monterey Peninsula Water Management District (MPWMD) and the Pajaro Valley Water Management Agency (PVWMA), dated December 15, 1991. The date of this addendum for reference purposes is September 28, 1992.

RECITALS

This addendum to the MOA is entered into in light of the following facts:

A. MCWRA is developing a Seawater Intrusion Program (SIP) to mitigate the effects of seawater intrusion into the groundwater basin along the coast under Ft. Ord, Marina, and the Castroville area. This program has been in the planning stages for several years. As part of this program, it has been proposed that pumping from existing groundwater wells supplying Fort Ord and the Marina County Water District (MCWD) be curtailed or eliminated, the construction of additional wells in the seawater intrusion area be limited or prohibited, and a replacement potable water supply be provided to Fort Ord and the MCWD by MCWRA, from wells to be constructed in the Salinas Valley. In order to control pumping from existing wells, MCWRA may acquire the existing wells. MCWRA may at some time seek to levy assessments within the subject area, to impose charges for water provided to the subject area, and to raise revenues from within the subject area in other ways, in order to operate, maintain, and improve the SIP in that area. MCWRA decisions on whether to proceed with this project will be made in the future.

B. MPWMD has an interest in this part of the SIP, in that part of Fort Ord and adjacent areas are within MPWMD's boundaries. Nevertheless, MPWMD does not wish to participate in the SIP, and does not wish to impede its implementation.

C. The impending closure of Ft. Ord calls for additional coordination among the three parties to this MOA.

D. The Board of Directors and/or Board of Supervisors of the Monterey County Water Resources Agency has requested changes in the original MOA.

(MOA.ADD - 2/17/93)

AGREEMENTS

1. Consent to project within territory of Ft. Ord. The parties hereto agree that MCWRA may carry out the SIP within the territory presently occupied by Fort Ord and northwards along the coast, may acquire existing wells drawing water from the Salinas Valley and other property within the territory, may provide water to the territory in connection with the SIP, and may exercise any regulatory authority within that territory as may be needed in connection with the SIP and may levy assessments and impose charges in connection with the SIP for water provided within such territory, without any further compliance with the terms of the MOA, notwithstanding that any part of such territory may be located within the boundaries of MPWMD.

2. Future expansion of MPWMD boundaries. If MPWMD boundaries are expanded to include additional territory involved in the SIP, MPWMD will not object to the continued operation of the SIP in that area.

3. Coordination of programs and activities in connection with closure of Fort Ord. The MCWRA, PVWMA, and MPWMD will coordinate programs related to the closure of Fort Ord and will cooperate in the implementation of future developments within the Fort Ord area. In anticipation that a portion of the future water delivery system to the Fort Ord area will be located within the MPWMD area and that the water supply for that system will be developed from the MCWRA area which is outside of the MPWMD area, the MPWMD and the MCWRA will comply with one another's ordinances as follows:

(a) The MCWRA shall have exclusive authority to regulate water delivery systems that deliver water to the area that is both within the present Fort Ord boundaries and within the MPWMD boundaries in existence at the time of the regulation, and the MPWMD will comply with any such ordinance enacted by the MCWRA.

(b) The MPWMD shall have exclusive authority to regulate the management of the Seaside groundwater basin within the present Fort Ord boundaries, and the MCWRA will comply with any such ordinance enacted by the MPWMD.

(c) This Memorandum of Agreement does not commit the MCWRA to provide any specific quantity of water to Fort Ord or to any portion of it, nor does it commit the MCWRA to provide any water to Fort Ord from the Salinas Valley Groundwater Basin. It also does not give to an other agency the authority to compel provision of water to Fort Ord.

4. Deletion of paragraph 18. Paragraph 18 is deleted from the original MOA.

(MOA.ADD - 2/17/93)

5. Deletion of paragraph 19. Paragraph 19 is deleted from the original MOA.

IN WITNESS WHEREOF, the parties execute this memorandum of agreement as follows:

MONTEREY COUNTY WATER RESOURCES AGENCY:

Dated: May 25, 1993

By *John J. E. Lynch*
Chair, Board of Supervisors

MONTEREY PENINSULA WATER MANAGEMENT DISTRICT:

Dated: 15 APRIL 1993

By *Terrence D. ...*
Chair, Board of Directors

PAJARO VALLEY WATER MANAGEMENT AGENCY:

Dated: 7/14/93

By *Edward J. Kelly, Jr.*
Chair, Board of Directors

Approved as to form:

William K. Rantz
Counsel for MCWRA

Dated: 5/6/93

Approved as to form:

Alvin ...
Counsel for MPWMD and PVWMA

Dated: April 7, 1993

SIERRA
CLUB



VENTANA CHAPTER

P.O. Box 5667 Carmel, California 93921 408 - 624 - 8032

July 20, 1996

Board of Directors
Monterey Peninsula Water Management District
Box 8
Monterey, CA 93942

Greetings:

This is to confirm the request I made at the Board meeting last Monday. It relates to the DEIR for the Fort Ord Reuse Plan.

In our opinion, the procedure used to determine the Preferred Alternative fails to comply with CEQA Guidelines and therefore the DEIR is totally inadequate. The Ventana Chapter plans to request that it be revised and recirculated for public review. We urge you to do the same. Incidentally, the Monterey Bay Unified Air Pollution Control District has asked this to be done, too, but, of course, for other reasons.

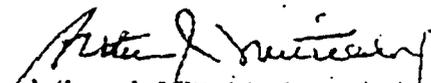
One of our principal objections is the fact that the DEIR does not address the "reasonable" alternative recommended by Mayor Alan D. Styles of the City of Salinas in his comments, dated February 6, 1996, on the Notice of Preparation:

"The Program EIR should identify the level of development possible on Fort Ord from on-site wells without aggravating or accelerating the rate of seawater intrusion as required by the MOU between Fort Ord Reuse Authority (FORA) and the Monterey County Water Resources Agency (MCWRA). That is, one growth scenario evaluated in the EIR should be a [sic] constrained by on-site water resources and by no increase in the current rate of seawater intrusion."

Unfortunately, the DEIR failed to evaluate this, possibly most reasonable, alternative which would be based on a safe and sustainable yield of water.

Again, we respectfully urge you to join us and the Air District in requesting that the alternative recommended by Mayor Styles be addressed in a revised DEIR and that it be recirculated for public review.

Sincerely,
VENTANA CHAPTER, SIERRA CLUB


Arthur J. Mitteldorf, co-chair
Conservation Committee
AM/DM/SA/CG

340-12

Attachment 3

SPECIFIC COMMENTS ON FORD ORD REUSE PLAN DRAFT EIR
BY MONTEREY PENINSULA WATER MANAGEMENT DISTRICT
October 11, 1996

3

Page 2-6, Section 2.4, Summary of Alternatives Analysis. This section briefly describes the four alternatives to the proposed project, and Table 2.4-2 provides a detailed comparison of the proposed project's impacts with those of the four alternatives considered. In terms of water supply needs (Impact Issue 4 of Table 2.4-2), the water demand for the alternatives and the proposed project ranges from 9,346 to 18,262 acre-feet per year (AFY). However, this range in projected water demand is 2,746 to 11,662 AFY greater than the annual pumpage of 6,600 AFY that is contained in the agreement between the Monterey County Water Resources Agency (MCWRA) and the Army (as described in the Draft Fort Ord Reuse Plan, Volume 2, page 4-160). As a responsible local water resources agency, the District is concerned that specific plans for allocation of the 6,600 AFY supply, and development of the anticipated additional supplies, are not clearly identified and described in the draft EIR document.

At a minimum, additional discussion should be included in the Final EIR that more specifically details the proposed water supply source(s), planned implementation schedules for water projects, and associated impacts, that would be necessary to meet demands of the proposed project and each alternative considered. The Final EIR should discuss how the water supply system will be managed and expanded to serve the needs of the base. Concern is raised in the EIR about supplying water to the Del Rey Oaks, Monterey and Laguna Seca areas of the property, yet the needed infrastructure for water service is not discussed.

There is no discussion regarding management of the water resources. How will new or expanded uses and water demand be tracked? Will construction occur without acknowledging potential water demand? Will there be a water allocation system, and will it be based on actual water use? Will specific development projects that may be underway be halted when actual water use exceeds supply? These and other water management questions must be considered.

Pages 3-11 and 12, Section 3.7, Permits and Approvals. Compliance with regulations and obtaining permits required by the Monterey Peninsula Water Management District are not mentioned. Examples include compliance with conservation (and rationing) ordinances and required permits for creation/amending/annexations of water distribution systems and obtaining individual water meters for specific development projects within the District.

Page 4-38, Water Supply. It is not clear if the information available in this section of the draft EIR is sufficient to satisfy recent changes to California Environmental Quality Act (CEQA)

requirements regarding coordination of land use planning with local water supply availability. Specifically, it is not clear if a specific "water supply assessment" document is required to be prepared for the Fort Ord Reuse Plan, to be in compliance with CEQA. It is the District's understanding that for any projects which would result in a net increase in water demand equivalent to water required for five hundred dwelling units (as defined in Water Code Section 10913), the city or county is required to identify any water system that may supply water to the project and request from the local water supplier a water supply assessment (as per Water Code Section 10910 and Public Resources Code Section 21151.9). The city or county is then required to include the water supply assessment as part of the EIR (as per Water Code Section 10910(d)). Please comment as to the applicability of the above-cited sections to the Fort Ord Reuse Plan.

Also, note that the words "Seaside Valley" should be replaced with "Seaside Basin."

Page 4-39. Regulatory Issues. Discussion of the District's involvement in permitting projects at Fort Ord should be discussed (see 3-11 above).

Page 4-42. Need for New Local Water Supplies. Paragraph 3. Consideration should be given to a "worst case" scenario where 6,600 acre-feet ("assumed to be assured") is not available without increased seawater intrusion. What actions would be taken in the event of seawater intrusion?

Page 4-42. Need for New Local Water Supplies. Paragraph 4. What is the source of the 3,300 acre-feet figure for potential reclaimed water? The updated study on reclamation potential cosponsored by MRWPCA, MPWMD, MCWD and others should be considered. Was consideration given to the possibility that conservation measures on Fort Ord, especially stringent conservation measures such as storm water capture, will reduce the amount of inflow to the treatment plant, resulting in less water for reuse? Consideration should be given to the observed trend that MPWMD ordinances to reduce potable water use have resulted in reduced sewage flows (CAWD/PBCSD). Was consideration given to the sizing and cost of a desalination facility that could produce enough water to meet peak demand and supply the needs of the new development?

Page 4-42. Need for New Local Water Supplies. 4th paragraph. Water supply options listed include "the importation of water from other sources." Clarification is requested. What sources would be considered and have reasonable potential for importation?

Page 4-43. Hydrology and Water Quality Program B-1.1. This program refers to identification of potential reservoir and water impoundment sites on former Fort Ord, with input from the MCWRA and the District. The District has not yet been contacted regarding this or the other hydrology and water quality programs discussed below. However, the District has undertaken reconnaissance-level investigations of potential water impoundment sites on former Fort Ord as

part of its long-term water supply planning process. Accordingly, the District looks forward to cooperating with the Cities/County on this program. 12

Page 4-43. Hydrology and Water Quality Program B-1.2. This program specifies that the City/County shall work with the appropriate agencies to determine the feasibility of developing additional water supply sources. The District has in the past, and is presently, conducting a variety of water-supply investigations, including desalination, and looks forward to cooperating with the Cities/County on this program. 13

Page 4-43. Hydrology and Water Quality Program B-1.3. This program specifies that the City/County shall adopt and enforce a water conservation ordinance at least as stringent as Monterey County's ordinance. It should be noted that the MPWMD ordinances are much stricter and result in greater water savings. The County's ordinance does not mandate retrofits to ultra-low-flow fixtures, while the District's Regulation 13 does. In addition, the District has rigorous construction requirements that exceed the County's requirements, including requiring installation of drip irrigation and recirculating hot water systems, and offering incentives for the installation of ultra-low water- using appliances such as washing machines and dishwashers. The EIR should consider the need for all entities involved to cooperate to develop an ordinance that would be applied consistently throughout the Fort Ord Reuse Plan area. 14

Also, enforcement of water demand management is not discussed. Without enforcement, compliance with conservation regulations may not occur or goals may not be achieved. Will water waste prohibitions be included as part of the proposed conservation plan? 15

Are there plans for a public information program to educate residents and businesses about the need to conserve water? How will such a program be administered?

Page 4-43. Hydrology and Water Quality Program C-3.1. This program specifies that the City/County shall work with the MCWRA and the District to estimate the current safe yields of those portions of the former Fort Ord overlying the Salinas Valley and Seaside ground-water basins to determine available water supplies. It should be noted that the District has conducted a number of water supply-related investigations in the Seaside Basin over the past 15 years. Accordingly, the District looks forward to cooperating with the Cities/County on this program. 16

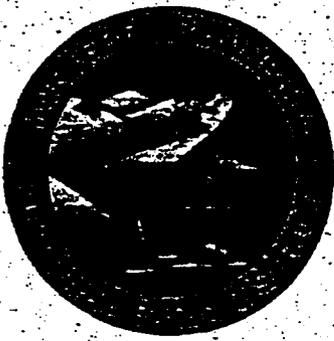
Page 4-43. Hydrology and Water Quality Program C-3.2. This program specifies that the City/County shall work with the appropriate agencies to determine the extent of seawater intrusion into the Salinas valley and Seaside groundwater basins and shall participate in developing and implementing measures to prevent further intrusion. It should be noted that the District conducts ongoing monitoring to assess seawater intrusion potential in Seaside Basin and looks forward to cooperating with the Cities/County on this program. 17

Page 4-43. Conservation Element, Last Paragraph. The EIR indicates that "because a number of reasonable, new water supply sources have been identified to support the proposed project, including the siting of an on-site desalination plant assuming adoption of the policies, programs, and mitigations identified above, *the increased demand for water would be considered a less than significant impact at the project level* [emphasis added]." The District disagrees with this assertion. Feasibility studies and specific project evaluations to verify that proposed water supply projects can supply the needed water should be completed before making such a determination in the Draft EIR. The District is concerned that the initial evaluation of water supply alternatives does not contain enough detail to adequately demonstrate that the lack of local water supplies can be adequately mitigated.

18

Reuse Plan, Appendix B, Business and Operations Plan, Page II-5, Potable Water System (Infrastructure Assessment), indicates plans to install "approximately 4,000" individual water meters. The District recommends requiring individual water meters on all new construction and incentives to encourage individual tenant metering in multi-family housing and commercial/industrial uses. By individually metering water users, responsibility for water use can be monitored and wasteful practices and leaks can be kept in check. Individual meters are one of the Best Management Practices adopted in the Memorandum of Understanding Regarding Urban Water Conservation in California by local water companies under the terms of AB 797 (1983) and subsequent amending legislation.

19



monterey peninsula regional park district

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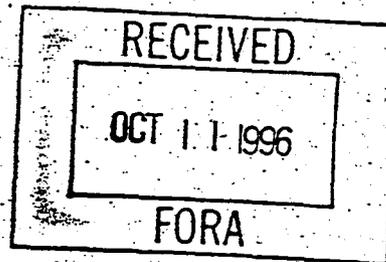
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DISTRICT MANAGER

Gary A. Tate

October 11, 1996



Mr. Les White, Executive Director
Fort Ord Reuse Authority (FORA)
100-12th Street, Building 2880
Marina, CA 93933

RE: FORA Base Reuse Plan DEIR

Dear Mr. White:

Thank you for the opportunity to comment on the content and adequacy of the Fort Ord Reuse Plan draft EIR.

The Monterey Peninsula Regional Park District (District) is a special district whose boundaries include the FORA planning area. The District represents over 150,000 residents of the greater Monterey Peninsula. The District's mission is to acquire and protect undeveloped open space values, including trails, for public use wherever and whenever possible. To this end, the District appreciates the opportunity to review and comment on the content and adequacy of the draft EIR as it effects District interests. We have both general comments and comments pertaining to specific polygons, mitigations, and/or program policies.

1. General Comments: The District commends the Fort Ord Reuse Authority (FORA) for their support of the proposed Fort Ord State Beach. Public ownership of this section of beach and dunes along the Monterey Bay was advocated in 1943 by the Monterey County Planning Commission as part of their long-range parks and recreation plan recommendations. It is heartening to see this long term community park and open space vision close to reality. The District also commends FORA on their support for the proposed Natural Resource Management Area and the network of proposed pedestrian and bicycle trails.

Notwithstanding this commendation, the District is very concerned about FORA's omission of potential off-site (off-project) impacts to established parks and open spaces. There are but a few policies and programs associated with specific polygons that address potential impacts to adjacent off-site public lands (i. e. HWQC Impact 3, ROLU Policy A-8, and Program ✓

A-8.1). They do not address the fundamental issue of regional impact. The sphere of park and open space use encompassed by the proposed reuse scenario will radiate throughout the greater Monterey peninsula and to every corner of the Park District. The cumulative impact of increasing the former population of Fort Ord by 250% without assessing the impact this may have on the public trust values of existing open spaces (not to mention other community issues such as traffic) is incomprehensible. The envisioned population will have very different community demographics and leisure standards than the military population it will replace. We highly expect this population to be more mobile and active in their pursuit of open space and park opportunities outside the former post. We are extremely concerned that the potential impacts from such a large population will negatively affect our ability to steward, protect, and administer the public trust values of our parks and open spaces. The build-out scenario is excessive and should be scaled back. We strongly urge FORA to acknowledge this potential impact and give it due diligence in a supplemental assessment.

We are also very concerned that there is no explicit mitigation monitoring program, as required by CEQA. Though FORA may not consider the policies and programs as mitigations per se, they are in effect and substance. We very strongly urge FORA to adopt a mitigation (or policy/program) monitoring program that will allow the public and other interested parties, such as the Regional Park District, to track the activity (success and/or failure) of the City/County accountability as laid out in the DEIR.

2. **Specific Comments:** The following comments are offered to strengthen perceived weaknesses in the policies and programs that have been proposed as mitigations for proposed project impacts to.

4.1 Land Use

PAGE 4-9, FIRST BILLET: There is no mention of potential incompatibility from the proposed golf course or other developed land uses as regards water quality. This is a omission and must be identified, acknowledged, and addressed.

ROLU POLICY A-1: If preservation of "irreplaceable natural resources and open space" are truly the goal, then the County should commit to more than just "encourage" its conservation and preservation. We suggest the following, "*The County of Monterey shall protect irreplaceable natural resources and open space at the former Fort Ord.*"

ROLU PROGRAM A-1.1: As the implementing action of Policy A-1, this too should reflect the County's commitment. Identifications and zoning alone do not afford protection in perpetuity. We suggest the addition of Program A-1.2 as follows: "*The County of Monterey shall cause to be recorded a Natural Ecosystem Easement deed restriction that will run with the land in perpetuity for all identified open space lands.*" This will guarantee the intent of Policy A-1 by putting real protection on open space lands for future generations, if that is the intent of the County.

ROLU POLICY B-2 : We read the intent of this policy to protect identified open space lands from incompatible land uses on adjoining parcels. If this reading is accurate, we suggest the following clarification: *"The County of Monterey shall protect identified open space land uses from incompatible and developed land uses on adjacent lands."*

ROLU PROGRAM B-2.1: The amended program B-2.1 now accurately reflects the intent and letter of our suggested policy revision.

ROLU PROGRAM E-1.2: We commend the County for its stated willingness to assist the state in its restoration responsibilities at Fort Ord Dunes State Park. However, the program begs the question, "What assistance?" As a mitigating condition, the assistance must be identified so as to ascertain its ability to cause a reduction or elimination of a potential impact.

4.3 Geology and Soils

SGC POLICY A-1: The NRCS Soil Survey of Monterey County is good, but cannot substitute for site specific conditions. We therefore recommend that the first sentence of this policy be modified to read: "In the absence of more detailed site specific information *or controversy*, the City/County shall ..."

SGC POLICY A-2: Projects involving moderate erosion risk also pose a potentially significant impact over time. We recommend that the end of the first sentence be modified to read: "... for projects that involve *moderate to high* erosion risk." Though not familiar with every parcel, we are quite familiar with the watershed and proposed land uses in the South Gate planning area and are extremely concerned about soil movement associated with water and impervious surfaces upstream from the proposed NAE (wetland open space) and the off site Frog Pond Wetland Preserve.

SGC PROGRAM A-2.2: This program does not address the potential for off site impacts to open space and natural resource lands created by use of exotic erosion control plant species. We would like to see this program expanded to protect adjacent and downwind/stream open space and habitat lands from exotic invasions. We recommend the following language change in the first sentence, "... The City/County shall ..." We also recommend a new last sentence to read, "*Soil erosion control plantings with the potential to introduce exotic species to open space or habitat areas shall be restricted to use of indigenous and endemic plant species only.*"

4.5 Hydrology and Water Quality

GENERAL: There appears to be several omissions in the sequential numbering of HWQC policies and programs: there is no policy for Program B-1.1; programs C-1.2 and C-1.4 are missing; as are policies C-3 and C-5. If this is by design there is no issue. If they have been inadvertently omitted, they need to be included.

Impact 1 Increased Site Runoff: The description of the impact accurately identifies the potential for ground water recharge interference caused by increased runoff but ignores the obvious impact of accelerated erosion. The second sentence, at the end, should include: "... which could interfere with ground water recharge, *and accelerate surface erosion and sedimentation.*"

13

HWQC POLICY A-1: This policy should also address soil erosion to be effective, and should read "... to ensure that runoff *and soil erosion* is minimized ..."

14

HWQC PROGRAM A-1.1: To support the policy, we suggest this program read as follows, "... to ensure *appropriate* storm water infiltration *and minimal soil erosion.*"

15

HWQC PROGRAM B-1.1: [Where is Policy B-1?] Because of the precious nature of water on the peninsula, all identified reservoirs and impoundment sites should be fully protected. Zoning alone will not ensure that these sites are protected as the program states. We suggest that the following language be inserted: "... on the former Fort Ord and zone *and deed restrict in perpetuity* those areas for watershed use that *will preclude all* urban development."

16

HWQC POLICY A-2: This policy should also apply to the cities as the description of increased site runoff impact states. In addition, the policy is silent on potential increases to the magnitude and duration of flows. We suggest appropriate language changes to read: "Policy A-2 (*City/County*): To avoid adverse effects on ground water ... areas, the *City/County* shall ... not decrease *or increase* the magnitude and duration of flows less than *or greater than* the mean annual flow ..."

17

HWQC PROGRAM A-2.1: Precipitation and runoff are not restricted to the east side alone. This policy should apply to the entire FORA planning area. This program should also be changed to reflect city responsibility as well. Finally, we do not believe that the public should be burdened with any of the cost of monitoring stream impacts caused by a private development. We recommend the following changes: "The *City/County* shall implement ... for *all perennial and ephemeral* creeks in the former Fort Ord *for* proposals submitted for development. The gauging program should be entirely funded by development fees."

18

Impact 2 Water Quality Degradation from Urban Runoff: Policy C-1 should be included if C-1 program elements are referenced.

19

HWQC POLICY C-2: We are concerned about the trailing qualifier, "to the extent feasible", as it relates to the commitment and assurance that pollution will be filtered out of urban runoff from new developments. This trailer begs the questions, what constitutes feasible? If what is necessary is deemed not feasible, is some pollution control measure that is less effective at controlling water pollution, but is feasible, going to constitute an adequate mitigation? We find it hard to conclude as such. Make it plain and straight forward, developments that can not protect

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water sources from pollutants will not be permitted. We recommend that this qualifying trailer "to the extent feasible" be eliminated.

20

HWQC PROGRAM C-2.1: As written, this program avoids commitment and assurance that water pollution will not be acceptable. We recommend eliminating the passive and non-binding "could" so as to read, "... measures and site drainage designs that *individually or in combination* will be implemented in new development ..."

21

Impact 3 Water Quality Degradation from Golf Course Adjacent to Natural area Expansion: We fail to comprehend the rationale for singling out the two polygons cited. We believe it is self evident that any proposed golf course will have the same potential to introduce water pollution into their respective watershed and eventually into the bay. However, the distinction has been made and we will comment to its substance. With regard to the aforementioned impact relationship, we strongly suggest that it does not, in and of itself, constitute an adequate response to potential impacts on the NAE. We request that, on biogeophysical reasons alone, the policies and programs are ineffective unless applied to all the polygons within the "Frog Pond" watershed. These include, in addition to polygon 29a, 29b, 29c, 29d, 29e, 31b, and that portion of 25 proposed for alternative route 68. This stated, we have specific policy and program comments.

22

ROLU Policy B-2 and Program B-2.1: See comments from above.

BRC Policy A-8: This policy statement erroneously assigns land stewardship responsibility and authority to the county. The "Frog Pond Natural Area" referred to belongs to the Monterey Peninsula Regional Park District that retains proprietary responsibility and authority. This policy statement should read, "*The Monterey Peninsula Regional Park District shall maintain the quality of the habitat in the Frog Pond Wetland Preserve.*"

23

BRC Program A-8.1: For the reasons stated above, this program should apply to all polygons in the watershed. This program is also very similar to HWQC C-1.2. We very strongly recommend that the program read as follows: "*The City/County shall prohibit development in Polygons 31b, 29a, 29b, 29c, 29d, 29e, and 25 from discharging storm water or other waters into the ephemeral drainage that feeds into the Frog Pond.*"

24

HWQC POLICY C-1 AND PROGRAM C-1.1: The District fully supports this policy and program as it is applied to Impact 3.

25

HWQC PROGRAM C-1.2: This is a strongly recommended new program (provided the program number is available, refer to previous GENERAL comments above). To reflect the respective party negotiations, particular language has been drafted to address Impact 3 and reads as follows: "*The City/County will prohibit the direct discharge of storm water, or other waters from new impervious surfaces created by new development in Polygons 29a, 29b, 29c, 29d, 29e, 31b, and*"

26

25, from entering the ephemeral drainage that feeds the natural area expansion (polygon 3.1a). No increase in the rate of flow of storm water runoff beyond pre-development levels will be allowed. Storm water runoff from developed areas in excess of pre-development quantities shall be managed on site through the use of basins, percolation wells, pits, infiltration galleries, or any other technical or engineering methods which are appropriate to accomplish these requirements. Indirect sub-surface discharge is acceptable."

HWQC Policy C-2 and C-2.1: Previously discussed.

IMPACT 4 - WATER QUALITY DEGRADATION FROM INCREASED EROSION DURING CONSTRUCTION: We fully agree with the impact description. However, we also believe that degradation from siltation and sedimentation caused by changes in water runoff are not solely limited to the construction phase of land use. We recommend that the impact be more accurately worded by dropping the qualifier "During Construction." The description should also reflect the broader scope of the impact with the last sentence modified to read: "... related to construction, subsequent occupancy and use, and erosion control."

HWQC POLICY C-4: The use of the qualifying trailer "to the extent feasible" is much too passive and non-committal to constitute a bona fide mitigation. As before, we strongly recommend that this phrase be eliminated to demonstrate a serious and committed position on the issue. We suggest the following language: "... shall prevent accelerated siltation of waterways and wetlands."

HWQC PROGRAM C-4.1: Every landowner is near a waterway by the very nature of geography. Planning should be in the context of watersheds and not simply proximity to a water body. Therefore, to be effective, this program should read, "... a program that will provide, to every landowner, occupant, and other appropriate entities, ..."

HWQC Program C-4.2: We also strongly suggest another program that directly addresses the impact of soil erosion and siltation, Program C-4.2. It should address the appropriate time of year when construction involving soil disturbance will be allowed.

HWQC Program C-4.3: We also strongly suggest another program that directly addresses the impact of soil erosion and siltation, Program C-4.3. It should read, "Prior to the project construction phase, the City/County shall require new construction to implement all measures necessary to ensure that soil erosion and subsequent siltation does not exceed pre-construction rates."

SGC POLICY A-2 AND PROGRAM A-2.2: Refer to previous comments.

IMPACT 5 DEGRADATION OF WATER QUALITY FROM POTENTIAL HAZARDOUS MATERIALS SPILLS DURING CONSTRUCTION: This is another impact that we believe transcends time and is a

perennial risk. Canyon Del Rey Creek has already experienced hazardous waste spills at Ryan Ranch and the risk will increase directly with increased development. We strongly suggest that the impact description include post-construction spill potentials and include a new fourth sentence to read as follows, "*All of these chemicals and materials, and others, may also occur during regular post-construction activities.*"

HWQC PROGRAM C-1.5: The risk and consequence of hazardous and toxic spills does not terminate when construction ceases. We therefore recommend that this program extent to post-development occupancy of the land as well, with the following change: "... control plans be prepared and implemented for construction *and subsequent business/occupancy* activities involving the handling, ..."

33

Impact 6 Changes in the Amount and Quality of Ground water Recharge: Refer to comments on HWQC POLICY A-1 AND A-2 AND PROGRAMS A-1. I. AND A-2.1.

4.10 Biological Resources

BRC POLICY A-8: Refer to previous comments.

BRC PROGRAM A-8.1: This program is very similar to language developed by the parties of interest for polygons 31a and 31b and we therefore suggest that language be substituted as follows, "*The City/County will prohibit the direct discharge of storm water or other waters from new impervious surfaces created by new development into the ephemeral drainage that feeds the natural area expansion (polygon 31a). No increase in the rate of flow of storm water runoff beyond pre-development levels will be allowed. Storm water runoff from developed areas in excess of pre-development quantities shall be managed on site through the use of basins, percolation wells, pits, infiltration galleries, or any other technical or engineering methods which are appropriate to accomplish these requirements. Indirect sub-surface discharge is acceptable.*"

34

BRC PROGRAM A-8.2: This program is very compatible with the buffer program of ROLU B-2. However, we are very strong on our position that the firebreaks and vehicular barriers need to be located on the developed polygons, such as was worked out in the buffer zones for the realigned polygons 31a and 31b. We recommend the following changes, "*The City/County shall ... along the border of Polygons 31a and 31b. A shaded fuel break shall be located within a five acre primary buffer zone on the western edge of Polygon 31b. No buildings or roadways will be allowed in this buffer zone with the exception of picnic areas, trailheads, interpretive signage, drainage facilities, Park District parking. Barriers will be designed ...*"

We appreciate this opportunity to comment and look forward to reviewing the Draft EIR when it is published for comment.

Mr. Les White
FORA BRP DEIR
Page 8 of 8

Respectfully,

Gary A. Tate

Gary A. Tate
District Manager

DEPARTMENT OF TRANSPORTATION

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October 11, 1996

5-MON-1/68/101/218-VAR.
Fort Ord Reuse Plan
(DEIR) SCH #96013022

Ms. Ann Hebenstreit
Fort Ord Reuse Authority
100 12th Street, Building 2880
Marina, CA 93933

Dear Ms. Hebenstreit:

Caltrans District 5 staff has reviewed the above-referenced document. The following comments were generated as a result of the review:

- a. (Reference Page 2-16) - It should be noted that Caltrans, Monterey County and Monterey City Parks in addition to the Bureau of Land Management (BLM) are doing ongoing "joint planning" to minimize any future conflicts and impacts resulting from improvements to Route 68. This endeavor has included coordinating an early involvement with the private York School.
- b. (Reference Page 3-4) - A sentence should be added to the last paragraph in section 3-2 that says, "Caltrans and BLM have an approved MOU which addresses future uses of the State Route 68 easement property and interim management of lands within the corridor." 2
- c. (Reference Page 4-2) - Because this program-level analysis does not adequately describe specific traffic mitigation measures for projects as they come on line, we believe that subsequent CEQA environmental review include detailed traffic impacts, proposed mitigation and funding mechanisms. 3

342-1

Ms. Hebenstreit
October 11, 1996
Page 2

d. (Reference Page 4-12) - It should be noted that the perceived "incompatibility" between the Laguna Seca expansion and the Route 68 corridor is addressed in a MOU (executed 9/13/94) between Caltrans and the County of Monterey. The MOU establishes guidelines by which both agencies can fulfill their respective missions. Ongoing cooperation and joint planning are established in the MOU to minimize land use conflicts. Access from Route 68 to Laguna Seca is and will no doubt continue to be critical to County Parks fulfilling their mission.

4

e. (Reference Page 4-35) - This page addresses the erosion potential of a State Route 68 facility across Fort Ord. The statement that road construction could be "hazardous" is misleading. Caltrans technical studies indicate that impacts to terrain from cuts and fills can be minimized through conventional grading methods.

5

f. (Reference Page 4-66) - We are unfamiliar with the Florida Department of Transportation's Level of Service (LOS) Standards and Guidelines for calculating LOS and are suspect of the results after reviewing Table 4.7-1. Level of Service is dependent on many factors other than type of facility and traffic volume. Other considerations must include the following: % trucks, grade, shoulder width, lane width and character of traffic i.e. commuter, tourist, etc.

6

It has been a long standing policy that where State Highways are concerned, Caltrans has insisted on the most current Highway Capacity Manual (prepared by the Transportation Research Board) methodology.

7

g. (Reference Table 4.7-2, Page 4-74)

8

The Hatton Canyon Parkway project is a top priority for Caltrans and is currently listed in the 1996 STIP and programmed for the fiscal years 1998-1999. It was unclear to District staff why the Hatton Canyon Parkway project is the only improvement listed in the "No Conversion Army Use Only" column.

A Route 68 upgrade to a four-lane facility would not necessarily be a "bypass." Caltrans is studying an upgrade of the existing Route 68 alignment in addition to a bypass across south Fort Ord.

9

We are unaware of the inclusion of widening Route 218 in any financially constrained plan.

10

h. (Reference Table 4.7-3 Page 4-79) - The traffic impacts to State Highway facilities are inaccurate or understated. The analysis of LOS is inconsistent with both Caltrans and TAMC's own analysis for the same roadway segments. Sections of Routes 1, 156 and 183 are currently operating at LOS F. The final version of this document should be consistent with TAMC's regional transportation model and Congestion Management Plan. 11

i. (Reference Page 4-84, 4-86 and 4-162) - District staff believes that the discussion of traffic mitigation measures are not consistent with CEQA Guidelines, 15370. Much of the mitigation language uses vague phraseology such as, "shall coordinate with" and assist, support and participate in." District staff believes that the final version of this document should contain a more direct and substantive commitment to funding mechanisms and mitigation measures. 12

It should be noted however, after talking with Ms. Hebenstreit, that we did not have the "Business and Operations Plan" to refer to when reviewing this document which contains specific highway improvements and cost estimates. We would like to reserve the opportunity to provide further comments regarding proposed improvements of the regional transportation system, funding mechanisms and fair share fees regarding traffic impacts and mitigation until after we have received and reviewed the "Business and Operations Plan".

j. (Reference Page 4-86) Mitigation - The statement about FORA reserving the right to decide where its "fair-share" contributions will go to address traffic impacts is highly questionable. It seems that such contributions should be distributed equally so that all of the involved and impacted agencies would at least have the opportunity to use such funds as part of their programming efforts to address traffic deficiencies with their jurisdiction rather than FORA effectively making the programming decision for them. 13

k. (Reference Page B-2) - Please be aware that a cooperative agreement exists between the City of Sand City and Caltrans to produce a Project Study Report (PSR) that will study the widening of State Route 1 between Route 218 and the Fort Ord Main Gate at 12th Street. This PSR would also include the Fremont Boulevard Interchange 14

Ms. Hebenstreit
October 11, 1996
Page 4

I hope this letter gives your agency a clear understanding of Caltrans concerns with respect to this document and the *Fort Ord Reuse Plan*. Because of the significant traffic impacts that the *Fort Ord Reuse Plan* implies, we request that FORA include Caltrans in the development of the FEIR with respect to our concerns mentioned herein.

Please send us a copy of the Final Environmental Impact Report when it is available (Ref: California Environmental Quality Act of 1970, Section 21092.4). Thank you for the opportunity to comment. If you have any questions, please contact me at (805) 549-3640.

Sincerely,



Sarah J. Chesebro, Chief
Systems Planning and Programming



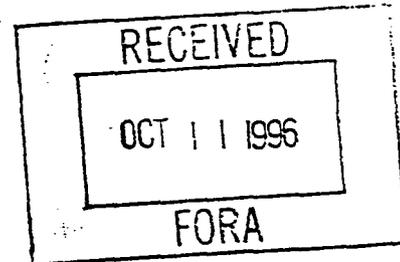
CREATIVE PROBLEM SOLVING INSTITUTE

- Corporate Strategy
- Merger Negotiations
- Due Diligence
- Investigations
- Conflict Resolution
- Investment Strategy

October 8, 1996

VIA MAIL AND FAX

Fort Ord Reuse Authority
100 12th Street, Building 2880
Marina, CA 93933



Gentlemen:

In mid-August, I attended the "town hall" meeting you presented at the Monterey Conference Center. The effect upon me was not unlike "Alice in Wonderland" where "black is white" and "up is down".

I have been a resident of the Peninsula for only five months, so I obviously don't know all of the background, politics, history, rationale, motivations, etc. that have resulted in the current status of Fort Ord. Other than the newspaper stories during the past few months and the information presented at the "town hall" meeting two weeks ago, I am the proverbial "visitor from Mars" who has just dropped in on the scene. I would like to offer the following comments from the perspective of someone who has fresh vision and significant prior experience in long-range planning and organizational matters:

- (1) The economics of the project (as presented by FORA) are totally dependent on the rather iffy assumption that somehow FORA will be able to convince the US Government to give the land away with no compensation. This doesn't seem to make sense if President Clinton intended for this to be a model for future community re-development projects throughout the country. 1
- (2) The various local municipalities have "divided up the spoils" and staked competing annexation claims to the property which will probably divide the community instead of bringing us together. 2
- (3) Apparently Marina wants to build a new airport just a few miles from the Monterey Airport, which to me looks like it is not being fully 3

343-1

225 Crossroads Blvd., Box 365 • Carmel, CA 93923
Phone: (408) 646-9901 • Fax: (408) 646-9902

- utilized and which appears to have plenty of room for future expansion. 3
- (4) The FORA representatives at the Town Hall meeting that I attended did not have any really substantive answers to some rather pointed (and well thought out) questions from the audience about the lack of adequate water resources for the development plans. 4
- (5) The primary beneficiaries of the current plan appear to me to be the myriad number of consultants already engaged in the process and, in the near future, the developers who are anxious to develop. One of the FORA representatives made the statement that the Plan tried to achieve a balanced position between the two diametrically opposed views of full development and no development. Isn't that a little like the man who had one foot in boiling water and one foot in freezing water and tried to make the best of the situation by saying that "on the average" everything was okay? 5
- (6) As I understand it, the whole project will be managed by representatives of the various competing local municipalities, each of which has understandably different objectives and interests. This has all the prospects of becoming the longest running feud since the Hatfields and the McCoys. Is there any reason why this area cannot become a separate political entity that would have its own separately elected governing body comprised of residents of Monterey County? 6
- (7) The whole thing smacks of the infamous Oklahoma "land grab" which unjustly enriched some at the expense of others. How can this possibly be the model that President Clinton would like it to be? 7
- (8) It seems foolhardy to proceed with a development of this magnitude without having first provided for the needed highways to provide access to the project. There was some veiled comments at the Town Hall meeting about this problem. My limited contact with some longtime Carmel residents indicates that they will approve the widening of Highway One when we have a ten inch snowfall in July. Any shopping center developer knows that you have to have adequate access to a major project or it will not succeed. 8

I could go on with additional comments, but that doesn't get the job done. My consulting firm (the Creative² Problem Solving Institute) is solution oriented. ✓

We provide constructive suggestions to help everyone involved in a "political" situation achieve a sense of satisfaction that their views were heard (which FORA has done) and that their concerns/needs have been adequately addressed (which it appears that FORA has not done). This is not meant to be critical of the FORA representatives, but is intended to highlight the fact that this is an extraordinarily complicated situation that requires some very farsighted and evolutionary solutions.

It seems obvious to me that there are two major issues that need to be addressed before FORA proceeds with its plan:

- (1) The essential character and nature of the Monterey Peninsula needs to be carefully studied and evaluated in terms of the highest and best use of this area for all of the citizens of California and not just the politicians, developers, consultants, etc. who have understandably selfish and short range objectives. In my opinion this Peninsula is the "soul" of California and it will be destroyed if the developers turn it into a miniature Miami Beach by adding more hotels, golf courses, etc. Its manifest destiny is to serve as a sanctuary for the nurturing of creative endeavors that will benefit the future of this country – this can be the incubator for the ideas and strategies needed to help the country move into the 21st Century with President Clinton's farsighted agenda.
- (2) The water problem will get worse for the Peninsula in the foreseeable future unless some long-term solution is effected. Unlike the inconvenience caused by the lack of adequate highway access, the absence of an adequate long range water supply is an absolute barrier to the FORA project as it is currently envisioned.

I have been told that various solutions to the water problem have been voted down by local residents who are opposed to further development in the area. One of these was supposedly a proposed desalination plant. Obviously no one wants a desalination plant next door to their home, however, it appears that no one has considered the feasibility of putting a desalination plant in the middle of the 14,000+ acres of the Fort Ord property that is "contaminated" with munitions ordnance and reserved for a wildlife habitat. As I recall, the western boundary of this 14,000+ acre tract is within one quarter mile of the ocean at one point. Why not dig a small canal inland at that point and put a desalination plant in the 14,000+ acre tract out of sight from all the area residents. This plan could then provide the water to service not only the Peninsula, but the whole Central Coast and Inland Valley area well into the 21st Century.

We are aware of numerous companies that operate in the area of water conservation/aquaculture food production/organic farming (see enclosed article from last week's Herald). It would appear to us that the bulk of the Fort Ord property could be used as a national showcase of water conservation techniques, aquaculture food production, organic farming, and the utilization of other advanced forms of environmentally sound systems planning and construction. This suggested utilization of the Fort Ord property would provide jobs to replace the jobs lost by the base closing and, more importantly, provide a model of redevelopment that could be useful for the entire world to witness without destroying the "soul" of this unique area. (0

We would be available, at your convenience, to assist in the long-range planning needed to address the issues outlined in this letter.

Very truly yours,



Charles R. Williams
Partner

cc: Editor, The Monterey County Herald

The MONTEREY COUNTY Herald

FINAL EDITION
52 PAGES
50 CENTS



SATURDAY, OCTOBER 5, 1996

Once a flop, organic farming in county starting to grow

BY BETSY LORDAN
Herald Staff Writer

It wasn't long ago in the Salinas Valley that organic produce was seen as a somewhat flaky niche market.

Two years ago, Monterey County Agricultural Commissioner Richard Nutter said there was "just not that much interest" from consumers in organic produce. And several large local grower-shippers had tried and failed to make inroads into the organic market.

But today, with sales at \$2.8 billion and growing at 20 percent or more a year, the U.S. organic foods market is coming of age.

The Nunes Co., one of the Salinas Valley's largest grower-shippers, took the plunge by introducing an organic produce line to East Coast consumers this summer, under its Foxy label.

Now Nutter is changing his tune.

"I misread the trend somehow," he said. "What I was looking at was that conventional growers were not embracing (organic farming). They were trying to work it in with conventional-type agricultural practices."

But the tendency today is to form alliances with organic growers who already have exper-

Please see ORGANIC PAGE 8A

5-575

tise in the field and a track record for consistency, Nutter said.

In 1995, organic growers reported nearly \$12 million in sales in Monterey County, up from \$9 million three years earlier. It's still a small part of the county's agricultural industry, which reported gross sales of more than \$2 billion last year.

Statistics from the Natural Foods Merchandiser, a monthly trade publication for the organics industry, show national organic-foods sales expanding by at least 20 percent annually for the last six years. They broke the \$2 billion level in 1994, with \$2.31 billion and rose to \$2.8 billion last year.

Studies published by The Packer, a weekly newspaper for the conventional produce industry, show that consumers are willing to pay an average of 23 percent more for organic produce than they do for conventional produce.

Opinions vary on why the national market has soared.

"Organics has lost the hippy-dippy luster it had in the past," said Matt Seeley, marketing director for the Nunes Co. "It's no longer a bunch of longhairs growing this product. There are people of all walks of life involved. It's gone mainstream."

"In the past, some organic growers developed a reputation for being quirky, and used that as an excuse for lower quality," said Jim Faulkner, general manager of Castroville-based Ocean Organics, a shipper of organic produce that is grown all over the western United States. "To us, this is not acceptable."

Diane Bowen, executive director of the Santa Cruz-based California Certified Organic Farmers (CCOF), said the organic market has finally become sophisticated enough so that retailers and consumers can count on getting a consistent supply.

"Organic agriculture grew and developed enough so that it could begin to deliver a year-round supply of large quantities, which was necessary for mass market retailing," she said.

As consumers become more health conscious and government regulations on pesticide use get ever more strict, growers have new incentives to farm organically, she added.

The CCOF certifies organic



Vern Fisher/The Herald

JERE LANINI, organic salesman for the Nunes Company, looks over organically grown broccoli at the company's plant in Salinas.

'Organics has lost the hippy-dippy luster it had in the past.'

—Matt Seeley,
Nunes Co.

growers so that consumers know they are buying real organic food. About 80 percent of all recognized organic growers in California belong to the organization, and Bowen said membership grew by about 40 percent between 1990 and 1995.

The organization inspects the farms of member growers each year, testing for soil fertility, and checking to see that organic crops and livestock are raised, harvested, stored and processed separately. Any grower converting conventional farm land to organic must wait three years before certified organic crops can be grown. Synthetic fertilizers, pesticides and growth regulators are not allowed.

Although the Nunes Co. became the first large Salinas Valley grower shipper to introduce a full line of organic vegetables last summer, it had tried and failed before.

In the early 1990s, when consumers were still reeling from reports of harmful pesticides being found on apples and Chilean grapes, the Nunes Co. tried to grow organic cauliflower and iceberg lettuce. Local shippers of

conventionally grown strawberries and artichokes also attempted to sell organic produce.

But the conventional growers, who were used to farming relatively large lots of 20 acres or more and dealing in bulk, suddenly found themselves supplying much smaller buyers. And the large retail grocery chains they had counted on soon lost interest.

"The commitment on the part of the retailers was very short-lived," said Seeley of the Nunes Co. "They didn't allocate long-term shelf space. And then consumer demand died down."

This time around, the Nunes Co. has teamed with the well-known Central Coast organic grower Natural Selection Foods, which provides a dozen organic vegetables for Foxy organic salad mixes, including radishes, broccoli, celery and various kinds of lettuce.

Itself a joint venture between King City conventional grower Mission Ranches and the organic grower Earthbound Farms, Natural Selection Foods grows and packs for the Nunes Co. It also markets its own line of salad mixes, under the Earthbound Farms label.

"Timing is everything," said Drew Goodman, owner of Earthbound Farms, which has ranches in Carmel Valley and Watsonville. "You need to know your customer base, know what their needs are and know what the market is prepared for. Maybe (the rush by conventional growers into the organic market in the early '90s) wasn't right then, and it's more of a fit now."

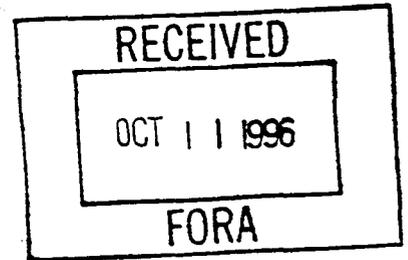
343-6

Mr. Terry Olesen
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email: oles@redshift.com
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*Addendum
to earlier comment*

October 10, 1996

FORA
Public Comment on Initial Draft EIR
Hand-delivered to FORA
12 Street Gate



Dear FORA Members

I am submitting this letter as my public comment as a citizen of Monterey County in response to the Draft EIR for Ft. Ord.

I am interested seeing a safe cleanup done before--not after and not during-transfers of parcels (conveyance) of any sort takes place.

After discussions with several other citizens and policy watchers I believe the Draft EIR has not seriously considered the Superfund status of the Ft. Ord nor based its landuse plans on the current high NPL ranking of the EPA as a superfund site (about "46").

I see the Draft EIR relving only on Army DoD studies, and these studies were subsidized by an agency having no longer a stake in the land but lots of reasons to transfer it quickly ; nothing of a comprehensive independent assessment ~~has been be done~~ by a site-wide EIS (under NEPA--National Environmental Policy Act) has been done.

Even should FORA legal counsel find a loophole in Federal law exempting Army/Dod from doing an EIS (sitewide) I believe one must and should be done. (It has not been done.)

We. the citizens of the Monterey County. will be the inheritors of serious contamination of well water, ground water, soils, and coastal sand dunes. The very fact of the Imjin Road OU2 Landfill taking in contaminants from other sites now, raises the spector of further contamination (from excavation and transport of settled contaminated soil).

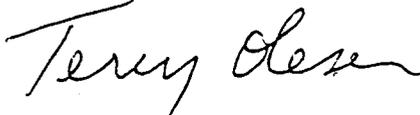
Finally UXO (ordnance) contamination is present in large amounts, ranging from small primer devices to larger mortar and anti-tank ordnance, these occupying very large areas of the base according to the Army Corp of Engineers own 1994 Alabama Report on ordnance at the base. Somehow Army/Dod got ordnance classed as other than hazardous waste. That is a mistake and should not exempt Army/DoD, nor FORA, from provisions of NEPA.

I believe the liability and moral considerations involved call for a complete break with the past of keeping FORA deliberations separate and unlinked to Base Cleanup. The OU2 landfill removal and capping underway poses an imminent danger to public health and is based on scanty, missing, and/or falsified data. Well monitoring and sampling has been inadequately conducted, and one of the well testers, called NETI Inc. has been charged and convicted of falsifying water test data. The public input mechanism for Army/EPA Records of Decision (the Ft. Ord Restoration Advisory Board) is in shambles. (See attachment that appeared in the Monterey County Post).

Due to the serious irregularities above, the Draft EIR must be revised and all conveyance at Ft. Ord should halt, until such time that FORA (and the local city councils, city managers, and advisory boards) determine via independent experts and citizen-oversight committees that the present hazards have been appropriately assessed, ranked and mitigated per NEPA (and where necessary CEQA).

A fast track conveyance where FORA works independently and makes decisions on faulty cleanup data is not good public policy making, will not be just, and shall actually leave us with greater risk of inheriting tainted water and unsafe soils for the anticipated 70,000 inhabitants at the site. Please I urge your careful consideration of these comments in revamping the Draft EIR as well as your own process.

Sincerely,



Mr. Terry C. Olesen
Citizen of Carmel Valley
Formerly Citizen of Marina
Attachment (1)

The Series

THE ENVIRO MENT

A TOXIC MESS REMAINS AT FORT ORD By Terry Olesen

If it is trying to make an honorable and clean exit from the former military garrison, the Army and Department of Defense have failed their mandates.

Two years ago, these agencies installed a Restoration Advisory Board to "involve the public" in restoring the land to a "remediated" if not actually livable condition. Since then they've spent tens of thousands dollars spread over 20 meetings to achieve this end (1. ~~Budget is pending request from Veterans Slope of the RAB and Soil Contamination Base Environment Coordinator~~).

It's only right and fair this be done. Fort Ord has been parceled and conveyed in pieces since the base closed in 1991. It's been a challenge, even for full-time experts, to keep up with the Fort Ord's transformation of buildings, roads, rail lines, sewers, land forms, wildlife, things above and things below the ground.

After sixty years and thousands of soldier-inhabitants, Fort Ord became a repository of polluted soil, asbestos ridden buildings, unexploded ordnance and tainted well water. This led the Environmental Protection Agency in 1991 to rank it as a Superfund Contamination Site; earning the nation's highest priority for cleanup. And with that, came clearly a state sanction for extensive and democratic local public input (2. Taken from Comprehensive Environmental Response, Compensation and Liability Act. Federal law that specifies funding and public comment procedures for cleanup of

abandoned or uncontrolled hazardous waste sites. CERCLA establishes criteria for the creation of decision documents that regulate proposal making, responsibilities of local actors, and the actual cleanup. Includes provision for Superfund designation and monies. The Army is required by law to follow CERCLA.) Unfortunately that mandate is not being followed well, and sometimes not at all. And here's why.

CAMU, RAB, RABBERS, UXO, BCT, DOD and so forth and so on

Civic responsibility to the local citizens and environmental wisdom all dictate that the former base's planned development, or "reuse" be driven by how well cleanup goes. If it is dirty or dangerous, don't build. If you're uncertain, go slow. Despite the economic goodies connected with the conversion, it should not be the other way. Yet this is precisely the feeling one gets when attending (or participating) in the Army/Department of Defense sponsored Restoration Advisory Board meetings and subcommittees. The original Superfund legislation and the Secretary of the Army's own letter to a local RAB member call upon the Fort Ord Base Cleanup Team (BCT) to take strong steps to "fully involve" the public in "risk ranking" and "relative prioritization" of the land, air and water at the base. (3. Letter from Secretary of Defense Togo West, Jr. to Mr. Curt Gandy of the Restoration Advisory Board, dated Jan. 1996, in response to Gandy's complaints regarding the public involvement at Fort Ord.)

The actual nuts and bolts of this is another thing. Restoration Advisory Board members

have not had the technical expertise required, nor has an independent agency been set up to judge and weigh those comments when proposed plans or records of decision are reached. Both the spirit and the letter of the law are flawed here.

The two proposed plans (for cleanup) that resulted this last May were the product of a muddled, and at times, manipulated process. As reported in the Coast Weekly (4. Coast Weekly, page 10; Sept. 19, 1996), some dissenting citizen reported intimidation (threats) by the Army both outside and inside Restoration Advisory Board meetings.

I have attended at least three Restoration Advisory Board meetings, and interviewed many of the principals. My notes show that the Army Corps of Engineers and the Base Cleanup Team has developed a quick, but unproven technical fix (5. Superfund Proposed Plans: US Army Proposed Cleanup Plan to Address Human Health at the Site 3 Trainee Ranges and US Army Proposed Cleanup Plan: Correction Action Management Unit at the OU2 Site, Ft. Ord, CA. Also meeting notes taken May 1996 at Soil, Water and Office Environmental Waste meeting, based on statements by Mr. David Eisen, Engineer, Dept. Army Corps of Engineers.) that attempted to resolve problems in both Proposed Plans; (for the buried Imjin Road Toxics and the Marina Beach Fire Range lead-filled dunes.)

Continued on page 20

5-74-3

COMPLIMENTARY

The Monterey County Post

THE ENVIRONMENT

Continued from page 9

A Toxic Misfit

This fix the Army calls a Corrective Action Management Unit (CAMU) is simply a landfill that will consolidate Fort Ord's most toxic regions with firing range sand from the coast acting as a top layer.

Mr. Gandy and other RABBERS (members of the Restoration Advisory Board) say the fix alters the original Record of Decision (cleanup plan) and an amendment should be submitted and run by a technically informed public. The Corrective Action Management Unit quick fix is held onto fiercely by the Army's Base Cleanup Team, however.

The Corrective Action Management Unit will create an odd mixture of hydrocarbons, hospital waste, unexploded ordinance and lead that will inhabit the fill. The one alternative proposed (to excavate the zones and ship out and neutralize the waste) would cost the Army at least double (\$16 million versus \$7 million). The alternative plan proposed would also hold up the timeline for conveyance, something that the Army, the local municipalities, Fort Ord Reuse Authority (FORA), local developers, seem to want to avoid at all costs.

Some of the public members of the Restoration Advisory Board (RABBERS) feel that the Army should not pursue a Corrective Action Management Unit (CAMU), but instead deal in favor of an in-depth, independent assessment, possibly followed by excavation and cleaning. This is not unreasonable since last year a Department of Defense (DOD) sponsored a Santa Rosa toxicology firm which was indicted for falsifying toxicity data. (6. news article from *The Herald*.)

RAB and RABBERS

This writer's attendance at three Restoration Advisory Board (RAB) related meetings and off-site interviews with Restoration Advisory Board members (RABBERS) paints a sad picture of

"public involvement." Frankly, the process has been poorly executed or manipulated.

For example, I attended a Restoration Advisory Board meeting on June 27, 1996. At 7:00 pm, a divided and hostile Restoration Advisory Board met in an "open meeting" at the Open Mess Facility at Fort Ord with 19 citizens in attendance. Counting the Army and Department of Defense (DOD) meeting specialists, there were about 30 RAB-related personnel. Following on two months of uncertainty, the Restoration Advisory Board (RAB) "found" its Community Co-chair, Curt Gandy, (an experienced and outspoken cleanup critic of the Restoration Advisory Board and former base cleanup worker) to be no longer a member. This RAB decision was supposedly due to a two year "term limit." RAB also decided against four local government agency members (again, term limits.) With Mr. Gandy's absence, a former Army sergeant took over as meeting chair (the Community Vice-Co-Chair.)

For the citizens watchdogs, this was a setback. The Selections Committee would be comprised of the Community Co-Chair, two of her appointees, and three local government agency representatives. Most observers agreed that Mr. Gandy was essentially out of the picture. But, by August, the Selection Committee had confirmed the renewal of five of the RAB members, but rejected Mr. Gandy.)

Pacific Grover member, Scott Allen, recalled the meeting, "the Army's attitude was impatient [with those questioned]; the atmosphere to the public was hostile."

Much of the rest of the meeting was spent spinning wheels and resolving very little matters. The energy of the meeting seemed to shift constantly around a squirming table of 30 Restoration Advisory members, allies and with the meeting managers circling around.

Frenzy

The next agenda item came up about 7:45 pm. Richard Bailey and Diane Huth introduced a Sierra Club Advisory Letter calling on the

Restoration Advisory Board to extend public discussion via public workshops on the cleanup efforts. The Restoration Advisory Board hung frozen for approximately 10 seconds, then much fury was released.

The Seaside Hotel and golf course supporters backed by the Army meeting managers immediately attempted to squelch the motion. They fought on technicalities that the motion had not been introduced properly. The introducer to the motion, Richard Bailey, then asked the meeting managers to read the Sierra Club letter. At that point, one of the Army sponsored mediators snapped, "That's not our job."

After 20 minutes of jockeying, the measure forced to a roll call vote, was narrowly voted down. Another 30 minutes of debate ensued haggling over Robert's Rules. But in this, almost unnoticed, was one unique and good proposal: Seek fuller reporting with the Fort Ord Reuse Authority (FORA) over the relationship between Base Cleanup Process and the overall reuse of the base. This was promptly dismissed. More haggling went on, until I couldn't take it and left approximately at 10:45 pm. Reading my notes and the original transcripts puts one into a stupor all over again.

Conclusion

In my opinion, if this is "public involvement," then FORA, the municipalities, and the general citizenry should be angry.

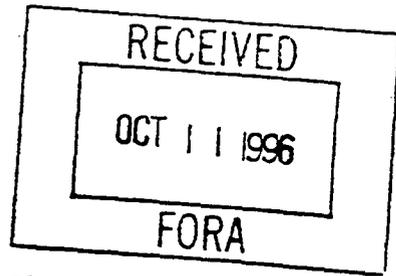
Public questioning of the Army's favored plans are met with manipulation and hostility. Please let us invite in a high level blue ribbon panel. Perhaps Sam Farr and Bruce MacPherson can help appoint members to the panel with the Army/Department of Defense managers, the Base Cleanup Team, and get FORA back on track.

We want a fair process and a cleaned base for the anticipated 70,000 inhabitants there by 2050 AD.

4-44

Donna Burych
900 Major Sherman Lane
onterey, CA 93940

10 October 1996



re: Comments on the Draft EIR on the Fort Ord Reuse Plan

Fort Ord Reuse Authority:

I oppose the current preferred plan. In particular,

- 1) Responsible urban planning must stay within the resource limits of the land. The preferred plan exceeds the available water supply of 7000 acre feet.

I request that an alternative plan be offered that stays within this limit.

- 2) Projected traffic needs should consider the current trends of flexible working hours and workforce distribution through remote systems. I question the destruction of irreplaceable and unique oak woodlands to build new freeways using models that may not consider these trends, especially when widening of current freeways would be adequate.

I request that an alternative plan be offered that preserves the coastal oaks and that calls for the widening of existing roads.

- 3) The plan for Fort Ord should address the replacement of losses caused by the closing of Fort Ord. I oppose the current preferred plan because it goes far beyond this goal and calls for excessive increases in development, industry, and population.

I request that an alterantive plan be offered that addresses the losses from the closing of Fort Ord and goes no further.

Respectfully submitted,

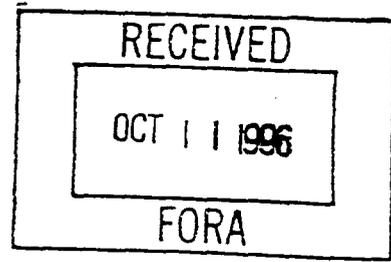
Donna Burych
Donna Burych

1
2
3

PATRICIA ELM
456 DELA VINA H-2
MONTEREY, CA 93940

10-9-96

FORA
100 12th St Bldg 2580
Marina CA 93933



Please come to your senses and
scale WAY back on any
"development" so that there
will be enough water for
those of us already here.
Growth is not always good.
We don't want to be another
San Jose!

Sincerely

Patricia Elm

RECEIVED

OCT 11 1996

FORA

October 9, 1996

Dear Sirs:

We are writing because we feel strongly that a new draft environmental impact report is necessary before continuing with the FORA plan. We do not believe that the full significance of the huge number of new houses, residents and cars has been considered. Even if water were available...which it is NOT... there would be a deleterious effect on the entire area. This is considering only FORA and not taking into consideration the already excessive demands on water, traffic etc. due to CSUMB and the proposed development of San Carlos Ranch, as well as the planned homes to be built at Quail Meadows and other sites in the county. We get the general impression that the supervisors, mayors and other politicians involved in all this development and expansion are only interested in money. There is the increased tax money which will come in to be used by these politicians as they see fit. The prime duty of a politician, according to many politicians, is to get re elected. Other factors, such as the good of the people, the beauty of the area, possible pollution, etc. are very far behind and this is exemplified by the FORA situation..and by other developments as well. Money is power, particularly in the business of politics, and acquiring money for power seems at the heart of this matter. Wealthy developers have funneled huge amounts of money into trying to get their projects in so they can make lots more money and I wouldn't be surprised if a number of palms were greased under the table as well as the money and privileges to be gained by the politicians. Their plaintive cry is that they are doing it all to help the citizens and to provide more for their projects...all of which are really aimed at getting more votes to stay in power!

We are already short of water and rationing is likely, as it has been in the past, even without more houses, hotels, golf courses and such. It is *ridiculous* to consider placing more drain on our overburdened water by adding this huge city of an estimated 72,000 people!!

The lure of money and power is too much for the politicians to stop the excessive development but perhaps it can, at least, be scaled back?!

As ever, the politicians and developers make money and the average resident of the Peninsula pays in increased taxes, traffic problems, water problems, extra 'fees' and other methods of squeezing more and more money from them.

Stop this madness and get back to a sane outlook. A new report of the environmental impact is a start.

Desparately,

George Scrimshaw
Helen Scrimshaw

George and Helen Scrimshaw

347

11 October 1996

FOTP
P.O. Box 3115
Carmel, CA 93921-3115

Dear FORA,

The Fort Ord Draft EIR fails to disclose the environmental effects stemming from exposure to unexploded ordnance (UXO). Figure 4.6-4 of the DEIR is incomplete and fails to fully disclose the suspected presence of UXO throughout the former Army base.

For example Figure 4.6-4 of the DEIR does not show numerous known and suspected UXO sites located north of the main entrance gate to the base. Remarkably, the UXO map contained in the Fort Ord Infrastructure Improvement Project - Environmental Assessment/Initial Study, April 1996, Figure 9, pages 44-45, show numerous known and suspected UXO sites north of Fort Ord's main entrance gate.

The DEIR is inadequate for failure to discuss exposure to chemical weapons material (CWM) and Chemical Agent Identification Sets (CAIS). The Non-Stockpile Chemical Material Program - Draft Survey And Analysis Report, 2nd edition, 9 August 1995, on page CA-1 that CAIS were used on Fort Ord.

"Chemical agent identification sets (CAIS) were used at Fort Ord Prior to 1974 for field training of troops" and "At many installations around the country, CAIS were buried [during field training] and later encountered during construction-related activities; however no records of such practice or of subsequent CAIS discovery have been found at Fort Ord."

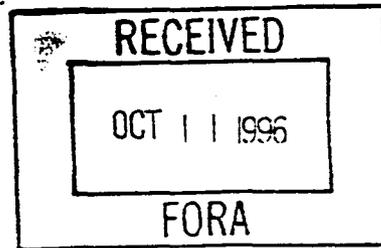
Additionally, in the same report on page (i) the Army admits "Except for buried CWM, information concerning the locations and quantities of NSCM [non-stockpile chemical materials, i.e. CAIS] is well documented. Although documentation surveys, interviews, and site investigations have been conducted, much information concerning buried CWM [CAIS] remains unknown."

This evidence that environmental exposure to CAIS may occur on the former Army base should be treated as a significant effect of the FORA Base Reuse Plan.

I request that you acknowledge receipt of my comments.

Respectfully submitted,

Curt Gaudy
Executive Director
Fort Ord Toxics Project



Fort Ord Reuse Authority
c/o Les White

October 11, 1996

Topic: Response to DEIR, Fort Ord Reuse

Dear FORA members,

I would like to begin by questioning the credibility of EMC Planning Group, the authors of this DEIR.

Those of us residing along the Highway 68 Corridor encountered EMC during the Bishop Ranch hearings as EMC wrote the EIR for that project. The Highway 68 Coalition found the Level of Service (LOS) figures regarding traffic on Highway 68 listed in the Bishop Ranch EIR to be fallacious. Mitigation measures to the increase in traffic generated included bus benches and bicycle racks, mitigation measures that were unrealistic for a semi-rural setting. Public hearings concluded that the LOS would soon be "F" for Highway 68 but the project that included a 60% increase in density and a golf course were approved anyway.

The Highway 68 Coalition next encountered EMC's work during the Marina airport and surrounding land use expansion. This project includes two million square feet of industrial/business park as well as the airport expansion. A joint public hearing by the Marina Planning Commission and Marina City Council was held. This involved them taking turns approving various aspects of the "plan" and certifying the EIR. Options were left open for future golf course/hotel/conference center/residential housing as parts of this. Elements apparently OK as part of the confusing EIR that had been written.

Once again, figures for traffic generated by this conglomeration project were unrealistically low. I raised a question at this public hearing as to why potential impacts to Highway 68 were not even mentioned

in this EIR. One would think that EMC having just recently completed an EIR for Bishop Ranch/Highway 68 would be very familiar with Highway 68. A councilperson for the city of Marina answered my question with the statement that the Marina airport combined project would have no impacts to Highway 68 because the project was 6 miles from Highway 68.

Now, EMC brings us a DEIR for Fort Ord reuse. They use a "programmed" approach that avoids specifics, involves a lot of wishful thinking regarding water availability, water use, availability of funds for road improvements, infrastructure, and promises to leave the taxpayers holding the bag to pay for future improvements or suffer a giant loss in their quality of life. The public health, safety and welfare are at stake. EMC was a poor choice to write the EIR.

I wrote a letter to Monterey County Supervisor Johnsen a few months ago requesting specifics and the parameters of a "memo of understanding" between Monterey County and the city of Del Rey Oaks. To date, no response has been forthcoming as to the nature of this MOU or its effects.

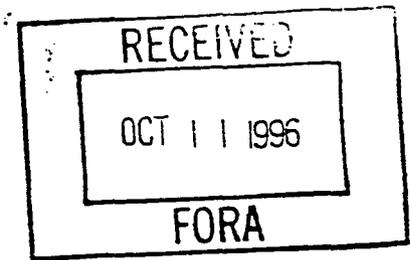
We understand, however that the official "plan line" for a future road around Highway 68, known as the south-west alternative, was "moved" to accommodate FORA chairperson and mayor of Del Rey Oaks, Jack Barlich's desire for a hotel and golf course adjacent to Highway 68 at Del Rey Oaks.

As chairperson of the Highway 68 Coalition I protest the idea of a hotel/golf course adjacent to our State Scenic Highway that is currently at LOS F during peak hours on that stretch of road. I protest the "realignment" of the Southwest Alternative when the Tier 1 Study by Cal-Trans regarding this Alternative is not yet complete. I further protest the inclusion of rural York Road as a major access point to the "back side" of Fort Ord.

The only logical thing for the FORA Board to do is start over with a specific plan that recognizes the limitations of our current water supply and highway infrastructure. Start over with a DEIR written by a group other than EMC.

Sincerely,
Mike Weaver
Mike Weaver, Chair
The Highway 68 Coalition
P.O. Box 868
Carmel Valley, Ca. 93924

VIRGINIA FRY
16 EL CAMINITO DEL NORTE
MONTEREY, CALIFORNIA 93940
408 372 6005



Mr. Jack Barlich, Chairman
Fort Ord Reuse Authority
100 12th Street, Building 2880
Marina, CA 93933

October 11, 1996

Dear Chairman Barlich:

As a former member and Co-Chair of the Fort Ord Restoration Advisory Board, and a long time resident of the Monterey Peninsula who has served on the Monterey Planning Commission, the Monterey Architectural Review Committee, the Monterey Peninsula Airport District Board, and the former Monterey Beautification Committee and Monterey Art Commission, I welcome the opportunity to comment on the FORA Plan and EIR for former Fort Ord.

Rather than repeat or rewrite comments that reflect my views, I concur with and support, in general, the comments of the City of Monterey and the League of Women Voters of the Monterey Peninsula.

There has been no shortage of comments from agencies and the public requesting that the Final EIR should recommend the Plan be revised to set a year 2015 population level at approximately 31,500 people (including CSUMB students), the same population that was on the base when Fort Ord was a full military installation. I am suggesting that serious consideration be given to using 31,500 as the *final* population figure for 50 year buildout.

Having stated my support for the comments of the City of Monterey and the LWV of the Monterey Peninsula on the Plan and the EIR, leaves me freer to argue more philosophically in support of a *lower population*, and *stronger design guidelines* for development proposals. 2

First of all, not all places on the planet are created equally. There is no question that the Monterey Peninsula is unique in natural beauty, flora and fauna, history, and other attributes. And for those reasons, it could be argued that it should be less invaded by the human species, and more carefully planned and designed when it is. The arguments that we need growth so our children and grandchildren will be able to *find jobs*, or we don't need growth if we want to continue our *quality of life* are both self serving. *The rareness of the region, in and of itself, is worthy of protection from too much growth and bad design.* Well planned, that rareness can provide a source of income and economic stability, and the continuation of the sought-after way of life. Too much population and/or poor design projects could end both.

Not every California landscape need go through a progression, fast or slow, from village to ultimately a San Jose, a San Diego, or a Los Angeles. Cities are beginning to study the concept of sustainability instead of increasing growth to insure economic viability. San Francisco, and Pasadena have already produced draft sustainability documents.

The FORA Plan concept of community design addresses subjects that make communities desirable places in which to live, such as planning neighborhoods that encourage people to walk, ride bicycles, interact with one another, or relax in parks and on trails. The Plan promotes areas surrounding, and within communities, become pleasant places through the use of landscaping, attention to design of buildings that blend with the environment, and with signs that can be seen without being imposing -- commendable words but difficult to implement because of the nebulous nature of *good* design, and developers plans that do not necessarily blend with our environment.

FORA should provide strong design guidelines to encourage jurisdictions to have the strength to stand up to developers who haven't the ability to think beyond the appearances of the places from which they hail, or without the sensitivity to integrate their projects into a broad vision of what the entire Monterey Peninsula area could visually become. Strong FORA design guidelines can help jurisdictions sway developers reluctant to comply with cities' design requests.

If each jurisdiction has an agreed upon general vision of what the region should *look like* then every jurisdiction is moving toward that similar vision which will improve the entire area to everyone's benefit -- residents, businesses, and tourists.

Past experience on the peninsula has shown that reluctant, even threatening developers, can be converted to the elements of better design than were in their original plans -- even becoming true believers. As an example, when Jack-in the Box first came to Monterey they proposed an orange cube with a large jack-in-the-box toy-like structure in gaudy colors dangling from the top. The city of Monterey suggested adobe and pine trees. The confrontation was long and heated but Monterey remained firm, and ultimately Jack-in-the-Box used photographs of the Monterey restaurant in their state-wide advertising. McDonald's threatened to not come to Monterey if they could not build their logo arches which Monterey declined to have on the city's horizon. The Monterey City Council said, "O.K. don't come," McDonalds flounced out. Within a year they were back with a new design which included trees and no large arch structure

On the bulk of the former Fort Ord land to be developed, all FORA can do to is aid the jurisdictions to fight for good design elements from developers by providing stronger detailed guidelines on landscaping, planting native trees, scale, mass, set backs, and height limitations. On the corridors on Highway One and Highway 68 those same elements should be detailed in a document that *legally* binds implementation because the ambiance of the entrances through the region affect all jurisdictions.

The FORA jurisdictions should think of the Monterey Peninsula as one entity stretching from Marina to Carmel *linked* by the elements of good design and by massive native tree plantings, and differentiated by the uniqueness and history of each. FORA can guide and demand what happens at former former Fort Ord, and by doing so, sensitively and wisely, can influence

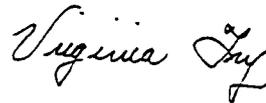
what happens off Fort Ord land thus ensuring that the entire region is enhanced, and integrated into a well designed community to the benefit of all cities and the county.

The FORA Plan needs a way that design elements for developments at former Fort Ord reflect the unique ambiance of this region and not the training of planners and architects from other areas. FORA needs a group similar to the Fort Ord Coordinated Resource Management and Planning Team that developed and watches over the Habitat Management Plan and its implementation. It could be the Fort Ord-Coordinated Design Management Team or some such designation, primarily a volunteer group to not dip into the short FORA funds. The group should consist of city planners primarily from Marina, Seaside, and Monterey, and long-time local architects, landscape architects, designers, and artists with experience in local, urban design. (I can strongly recommend a few who have demonstrated sensitivity to the local region: Boris Jacobowsky AIA,, Marvin Guillermo AIA, Russ Haisley AIA, and Bill Fell, City Planner)

Their function would be to develop Fort Ord Design Guidelines, advise the FORA board, and review developers' plans with the aim of suggesting how they could more closely follow the FORA Plan. They would in essence be an Architectural Review Board for FORA.

The critical issues in the development of Fort Ord, other than economics, are *how much development*, and *how will it look?* An Architectural Review Board, in my view, is a necessary component to assure the appearance of projects reflect the ambiance of this remarkable area.

Cordially,

A handwritten signature in cursive script that reads "Virginia Fry".

Virginia Fry

Responsible Consumers of the Monterey Peninsula
Box 1495, Carmel 93921; 408 624-6500

FORA REUSE PLAN EIR Comments
(c) Copyright 1996 David Dilworth

Citizens and professionals familiar with the EIR process will tell you there has never been an adequate EIR. As someone who has read bookshelves full of EIRs and EISs I am qualified to comment.

There are many honest attempts to obtain public comment and respond to the letter and spirit of the law. Your EIR and process is not among them.

With an honest EIR and process, a concerned citizen may make simple english language requests for information and clarity to better understand the project and to direct it to a reasonable conclusion.

With a hostile EIR and process a concerned citizen must take every opportunity to trip up the unresponsive process, to identify substantive and technical points of law and get them in the administrative record.

Just like a hostile witness in court, yours is a hostile EIR. You may expect comments intended to hold you to every point of the law we can find and with which we hope to stop this project in court. Unfortunately my comments will be brief and probably free of courtesy.

This project and DEIR sets a new low for lack of compliance with CEQA disclosure requirements in both letter and spirit. More than any other project I have evaluated, this one leaves me with a strong impression that the authors either do not care at all what is acceptable by the public, or are incapable of guiding the project into something that is anything more than acceptable by the absolute minimum number of votes required for passage by the FORA board.

The Public "hearings" were an OUTRAGEOUS CORRUPTION of the environmental review process.

The only "hearing" originally scheduled was as far away (in Salinas) from the majority of citizens who complained (Monterey Peninsula) as possible and still attempt to explain that it was not unreasonable.

People who were interested in testifying were told they had to be there by 7pm or they wouldn't get in - the doors would be closed because it was being broadcast on TV.

No FORA Board members were on the panel to listen to the testimony. Many people were kept from testifying because "we ran out of time."

In no particular order:

This DEIR is inadequate in its present form based on a variety of reasons including the following:

* The Draft EIR must be re-written and resubmitted as a new Draft EIR for public comment.

Mitigation in General:

General Douglas MacArthur said "In war there is no substitute for victory." Similarly for preserving species "There is no substitute for leaving it alone."

351-1

* For each mitigation measure, please identify and describe the non-subjective method of measuring:

- 1) the name of the criteria and the baseline (existing or current) number (numbers) for whatever criteria is used to measure the impact;
2. the degree, in both percent and amount to which the impact would raise or lower that baseline number;
- 3) the threshold number at which the impact changes from significant to less than significant;
- 4) the amount of reduction for each individual mitigation measure suggested;
- 5) the new total number after the suggested mitigation;
- 6) the total change from baseline to maximum impact;
- 7) the total change from baseline to maximum impact if all mitigation is implemented;
- 8) at least one real world example of a successful implementation of each proposed mitigation measure that is in place and has been self-sustaining for a minimum of 3-5 years;
- 9) detail how and how often the mitigation will be monitored.
- 10) list all legal remedies for complaints about any mitigation implementation and identify it as none if there are no legal remedies.

Monterey County and the Calif Coastal Commission have demonstrated an ability to enforce compliance with mitigation measures.

A glaring example is the Spanish Bay project approved in 1984. Today, 12 years later, neither the County nor the Coastal Commission have enforced many of the 120+ conditions set forth. Indeed one large serious condition, the closing of a road in environmentally sensitive habitat has not only not been completed - the road's use has intensified!

There is no evidence FORA, which is composed to a large part by the County, will do any better.

*Please describe who will be keeping track of the MITIGATIONS and determining whether they are being met so concerned citizens can provide some accountability. 2

*Please describe who will be keeping track of the CONDITIONS and determining whether they are being met so concerned citizens can provide some accountability.

*Please describe who will have enforcement power over the mitigations at Ft. Ord.

So the public can determine the track record of the ability of the FORA to follow-up:

Most mitigation measures fail.

The feasibility of mitigation measures need to be measured against an objective yardstick. The best yardstick is a successful track record. 3

Please identify successful examples of mitigation measures identical or similar to those proposed. Include descriptions of mitigation measures and where in the process the mitigation is now, and what percentage of mitigation has been successful. ↓

* Please describe all mechanisms the public has to enforce the mitigations described.

4

* Considering the track record of both applicant and mitigation monitoring authority described above, please explain how and why any mitigation measures other than "avoidance" can be responsibly recommended.

5

Sentence Complexity & Clarity:

* Please remove all complexity from documents. Merely avoiding complexity whenever possible is not enough.

6

A standard measure of sentence complexity is 17 words per sentence. Documents with an abundance of sentences longer than 17 words are considered complex.

* Please shorten sentences whenever possible to increase clarity.

* Please run the EIR through a grammar or style checking program such as "Rightwriter" or "Grammatic" to identify and breakup or simplify lengthy sentences.

* Please use a Spell checking program on the EIR.

* Please contact each EIR commenter by phone if any question or comment is unclear.

7

The type font is too small for me to read easily and I have 13-20 vision. It must be terrifically difficult for those with poor vision to read.

Please use a larger font - 10 point or larger.

Including vs Excluding Issues

It is requested that no issue be deleted for evaluation by this EIR. Several requests made during the scoping process remain unaddressed.

8

* Please do NOT delete discussion of ANY issue. The public will decide the significance of each issue.

* Please address EACH comment submitted during or for the scoping and EIR process. So that the public does not have to repeat its requests.

* Please list all the comments submitted during the scoping process that were not addressed in the EIR.

9

Environmental Impact Reports were originally created because of public outrage at being kept in the dark about significant issues. Omitting issues requested by the public recommends a return to those "dark ages" by taking some decisions of significance away from the public.

In acreage, this proposal is probably the biggest development in population terms in the United States.

* Please compare and contrast (using a table) each alternative with the 5 other largest developments ever to occur on the Monterey Peninsula in terms of homes, water use, traffic impacts and wild lands lost.

10

This will establish the historical perspective of the size and impacts of each alternative.

COMPLETE DISCLOSURE OF STUDIES

* Please VERY FULLY and SPECIFICALLY identify all sources of forecast data for population and traffic forecast data, methods, evidence & reasons.

Please include a complete list of references and sources.

* For each study (i.e. Forest, Air, Traffic, Water & Sewerage) please include all data, evidence, assumptions, methods and complete reasoning. Conclusions alone are NOT sufficient.

Reason: Very often conclusions are presented as fact, that could have an equally compelling argument that draws the exact opposite conclusion. The decision makers and the public need to have a complete understanding of all the components of a conclusion.

Margin of Error:

* Please use a "Margin of error" to describe a confidence level on all numbers that are not directly measured "hard data".

For each data set and assumption please include a confidence level. Reason: If two items are both presented as fact, without a confidence level an everyday citizen may never understand that fact 1 is beyond dispute, such as "the Moon orbits the Earth"; and that fact 2 is highly disputed, only slightly possible or is based on a complex chain of evidence and reason - like global warming.

* Please include the range of estimates used for any conclusion; the high, low and any mean or median estimates for any forecasts; and describe which estimate is used for each conclusion.

Please use graphs, diagrams and charts whenever data is presented. Tables of data don't mean much to the general public. According to the best selling book "Innumeracy", numbers and math intimidate most people. Graphs and charts allow those people intimidated by numbers and math to understand.

Computer Models Misleading:

"Because computer models are so poorly understood by most people, it is easy for them to be misused, accidentally or intentionally."

- From: A Skeptics Guide to Computer Models by Dr. John D. Sterman

* Please avoid computer models unless the models are made fully, and without charge, available to the public with specific hearing time set aside for a discussion of each model's value.

Facts Before Conclusions:

* Please insure and describe how you insure that conclusions are not allowed to be established before facts are investigated.

Doublespeak:

Doublespeak is - "Words used to avoid harsh distasteful reality."
- Doublespeak by Prof Bill Lutz

Thank you for an effort to avoid Doublespeak. Unfortunately several instances of it remain. Doublespeak is misleading whether deliberate or accidental. President Bush received the 1990 Doublespeak award for proposing a 1991 budget containing "no new taxes", even though it did

contain \$21.7 billion in "receipts proposals".

* Please remove all Doublespeak.

1) While there is a section called "Summary" there is NO legally adequate Summary.

16

2) There is no genuine No-Project alternative.

17

* I insist you prepare an honest No-Project alternative. No-Project means no building, no use of existing buildings, no conveyance to parks - no nothing after the base is cleaned up.

3) A reasonable range of alternatives is NOT examined.

18

Please quantify and compare the relative impacts with former military population and proposed civilian replacement population for -

Water Quantity Use,
Off base Traffic Congestion,
Sewerage,
Solid waste,
Fire,
Police and
Schools.

Then prepare an alternative that makes no additional demands on existing infrastructure and services including:

traffic
water quantity
sewerage
solid waste
fire
police
schools

And which makes no additional impacts on existing levels of:

air pollution
endangered species loss
noise
visual aesthetics

4) FORA was created to minimize economic "distress" to the communities of Seaside and Marina. No alternative which meets the "minimize economic distress" concept for which the plan was created.

19

* I insist you prepare an alternative that -
a) allows no more development than that needed to minimize economic "distress" to the communities of Seaside and Marina and
b) has no more traffic impacts than were experienced when Ft. Ord was operating in the 1980's.

To do so you will need to, and I insist you do, publish the necessary economic data for the cities of Seaside and Marina for the last ten years and graph it. This is to provide baseline and current economic data to establish how big a project should be sized to fit the above listed criteria. Include Taxable receipts.

5) No costs of cleanup of former Army base AFTER the Army leaves is discussed.

20

There are serious concerns about the lack of responsible cleanup ongoing and planned at the base.

- a) There has never been a basewide (sitewide) analysis for the Superfund problem - only a Hazard ranking to establish it as a Superfund site.
- b) There has never been a basewide Cleanup Plan for the Superfund problem. Each section is being done piece by piece.
- c) The level of cleanup the Army intend to do will not be as clean as County and City (Seaside & Marina) law allows for safe residential life.
 1. Only MOST, NOT ALL the unexploded ammunition will be removed.
 2. The ENTIRE Toxic plume from the Landfill is cleaned up. This is scheduled to take 30 years.
 3. The Property is scheduled to be released from ARMY responsibility in 1997.

Prepare and evaluate an alternative which

- a) has a basewide (sitewide) analysis of the Superfund problem,
- b) has a basewide (sitewide) Cleanup Plan of the Superfund problem,
- c) shall quantify and compare level of cleanup to acceptable living conditions to local law and background levels of risk.
- d) The Cleanup Plan shall require an EIR/EIS.

The Cleanup Plan shall require that -

1. ALL unexploded ammunition (ordnance) is removed.
2. The ENTIRE Toxic plume from the Landfill & Airfield is cleaned up. This is scheduled to take 30 years.
3. The lead ground contamination is removed to background levels - for the entire base.
4. Does not allow the Property to be released from ARMY responsibility until all the above are completed to the satisfaction of the Greater Monterey Peninsula public.

6) There is no alternative smaller than the proposed project - the preferred alternative. Almost all public comment received orally and written so far complains the project is too big. Both Supervisorial candidates for the 5th District complain the proposed project is too big. The cities of Carmel, Pacific Grove and Monterey and the County of Monterey complain the proposed project is too big and will have too many impacts and will be impossible to fund. There is no alternative that limits itself to the resources available - traffic capacity, water quality and water quantity.

Prepare several smaller, separate alternatives which -

- 1) Allow no more than replacement population
 - 2) Allow no more population than can use available water.
 - 3) Allow no more population than can use available non-health threatening drinking water.
 - 4) Allow no more population than can cause the same level of traffic impacts to the Monterey Peninsula and Salinas areas.
 - 5) That allow no more population than the 2 cities of Seaside and Marina have as of Oct 1996.
 - 6) Permit no more than 10,000 people over October 1996 population.
- 7) Population figures could vary by enormous amounts - by 50% or more, yet the EIR insists that a specific population will exist.
- Not one person more, not one person less.

The Population projections from AMBAG are wild guesses. You seriously undermine your credibility by citing AMBAG population projections as numbers of solid fact.

The AMBAG methodology for the population forecast has a terrible

track record. In 1987 their methodology told us the City of Marina's population would be 30% higher three years later, than it turned out to be in reality. It also forecasts Carmel's population to rise when Carmel's population has been steadily falling since 1980.

23

It is so bad AMBAG directors voted to insist any agency using AMBAG's population figures publish a disclaimer alongside the reference to the numbers reading so:

"Please note: This uses AMBAG population forecasts. These forecasts, based on general plans, are prepared as planning tools and are not an exact prediction of the course of future events. Past experience shows that these forecasts are most reliable at the county level and less so for smaller areas like cities and census tracts. Caution should be exercised in relying on these forecasts for small areas."

I insist you publish this warning alongside each mention of AMBAG's population forecasts. Particularly pages 1-2; 5-3 and in the Summary. That is if you decide to write a real, non-technical, informative summary.

8) Golf course construction

24

*Please state in the Summary that toxic chemicals are to be used on the proposed Golf Course on lands upstream from the Monterey Peninsula drinking water supply.

By my count there are 17 golf courses already on the Peninsula.

*Please describe the number, acreage and maximum water use of Golf Courses already on the peninsula to establish expected water usage.

I understand several new Golf Courses are proposed for the peninsula - in Pebble Beach, Here RSC, Bishop Ranch, Tarpey Flats, even Monterey County.

*Please list and describe all recent and proposed golf courses for the peninsula.

25

Golf Course Water vs Rationing for Homes
According to the MP Water Management Board 10% of Peninsula's water is used by Golf Courses.

*Please describe the percentage and total amount of water in acre feet which existing Monterey Peninsula golf courses use related to the CalAm service area and how much additional water demand the proposed courses would use.

26

*Please describe the percentage and total amount of water in acre feet which existing Monterey Peninsula golf courses use related to the Monterey Peninsula Water District service area.

27

Golf Courses are "Green Graveyards": They support no other kind of life - no trees, no birds, no insects - only turfgrass.

*Please list and describe the species (plant, animal, insects) typically found on Ft. Ord Golf Courses.

28

*Please list and describe the species (plant, animal, insects) expected to be found on the proposed Golf Courses.

29

Pages 4-62 & 4-63 leave Toxic Runoff from golf courses and home landscaping (Pesticides and fertilizers) undescribed.

30

351-7

*Please state in the Summary how the drinking water supply is "downstream" from the proposed Golf Courses.

31

According to the Wall Street Journal (May 2 1994) about 18 pounds of pesticides are applied per acre of Golf Courses.

Please note a 1991 study of 87 golf courses by the Attorney General of New York State "Toxic Fairways" described 6 of the most common pesticides "are known to be capable of contaminating groundwater after normal applications following label directions." (emphasis added)

*Please list, describe all chemicals (chemical name and Brand name) and the yearly amounts (in pounds) to be applied as to the proposed Golf Courses.

32

*Please describe the toxicity limits to humans for each chemical described above in terms of Carcinogenic, hazardous, poisonous, and lethal doses.

*If there are no studies of toxicity for a specific chemical - please explicitly note that.

*Please include an Material Data Safety Sheet (MSDS) for each chemical to be applied to the Golf Course, just as required for every chemical used in a school laboratory.

Typical Poisons used in Gcs are Phosphorus, Mercury, Arsenic, Diazanone insecticide, NemaCur (phenamiphos), ethylene dibromide and Chloroethanlonil.

*Please describe whether Hydrogen Peroxide will be used to prepare the ground.

*Please describe how this is a membership only Golf Course - The kind the State Commission rejected in PB recently.

Golf Tournaments are a huge traffic and parking problem in Pebble Beach. Are tournaments planned or prohibited on the proposed golf courses?

Water:

*Please prepare an Alternative which would reduce the size of Project so Water impacts are less than Significant.

33

*Please prepare Mitigation measures which would reduce the size of Project so Water impacts are less than Significant.

Edge Effect:

*Please prepare a map that shows the entire footprint of edge effects.

34

* Please study and detail how the health of each undeveloped area in the proposal area, and the health of each animal species residing within, degrades as it lives closer to each of the following man-made items:

35

1. Dirt path
2. Dirt roadway
3. Asphalt roadway
4. Home subdivision
5. Power lines
6. Septic system
7. Underground water system
8. Underground sewer system

351-5



* Please provide complete documentation to determine the minimum distance from any man-made item, including roads and any infrastructure, like underground water, sewerage, and power lines, needed to insure an area of un-impacted wildland and its wildlife habitat is self sustaining.

* Please examine and describe how far from each of the above man-made items that each species of native wildlife (from a real wildlife inventory) ceases to inhabit.

We need to know how far from human habitation wildlife are able and willing to live, in order to protect sufficient habitat for them to remain as healthy residents of our area. After all, they were here first.

If a minimum distance is not agreed upon, please use 300' as the minimum needed to insure any un-impacted forest.

* Please cite and describe studies that describe the how edge effect changes over years. (Whether damage to environment grows in area.)

* Please describe the three types of edges in edge effect where urban impact is the greatest impact.

* Please include color coded maps to show the habitat of each wildlife species.

* Please identify and map potential habitat for all special status animal species.

Edge Effects & Weather

"Edge effect" describes how trees at a new edge of a forest, where trees have been cut for timber or roads or subdivisions, are exposed to much higher wind gusts - which knocks them over prematurely, and erosion which exposes roots, and loss of wildlife and biodiversity necessary to sustain a healthy forest.

Forests near induced edges, for example, may have a higher density but lower diversity of birds than the interior forest. A number of studies have shown increased predation of songbird and quail eggs near forest edges. The predation is worst near developed areas (which might have unnaturally high populations of cats, raccoons, skunks, jays and crows)." - Mitch Lansky
"Beyond the Beauty Strip"

* Please describe the "Edge effects" of rain and heightened erosion on the remaining trees after the forest is cut down.

Please describe the "Edge effects" of wind on the remaining trees after the proposed forest cutting is finished.

* Please identify the length of each edge of forest and the amount of forest affected by different impacts such as barking dogs, dogs running loose, lights from homes, noise from roads.

* Please identify the length of the new edge for each subdivision after the proposed development and map and detail the number of acres that have been lost that were previously unaffected by edge.

* Please detail any proposed mitigation of micro-climate (tiny and very local weather) changes near roads and homes.

* Please describe the health of wildlands when they are reduced to "Islands"

There are three kinds of edge effect simply described: 1) trees cut in a forest, 2) roads cut in a forest, 3) Urban development next to a forest.

36

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351-9

28

Please identify by mapping which of each of these effect exist now and how they will change if the project is approved.

Please include the "Three tree height rule for wind penetration".

29

Sound:
Please use Map and detail the sound levels at most distant existing locations where the noise of construction could be heard.

Please explain the quantity and rate of tree removal.
Include expected start date related to final project approval.

30

The DEIR preparers should be aware that several recent studies conclude Central California has experienced at least two one-hundred year droughts in the past 1000 years. Meaning that 100 year droughts are common.

Please take the 100 year droughts that could recur in the project area, into account for all water use calculations. And explain how and where you have taken them into account.

Please prepare an Alternative that would not exceed the Reliable, Sustainable Water Available in worst case drought years (at the end of summer at the end of the last year of a 100 year drought).

Please include IN THE SUMMARY the QUANTITY of water (in acre feet) which would be required by each alternative proposed.

Please include IN THE SUMMARY the amount of guaranteed, SUSTAINABLE water the project has available for its own use.

Please include IN THE EXECUTIVE SUMMARY the amount of 100% guaranteed, 100% SUSTAINABLE water the project has available for its own use.

Please establish the maximum and minimum amounts of reliable sustainable water which is available for the project from its own resources and put it in Summary.

31

Please prepare mitigation that prohibits the use of all chemicals on the Golf Course and independently monitors for all toxics and chemicals that could be used.

32

Please prepare Alternatives an mitigation that will prohibit all further development when any toxics are found in the water leading to our Peninsula drinking water supply.

Fisheries:
"Acute and Chronic Toxicity to Fisheries"

Please prepare alternatives that prohibit the use of toxics and chemicals upstream from any water course that flows into drinking water supplies or fish habitat or the National Marine Sanctuary.

33

Air Quality:

Considering a 1990 EPA report by Tom Addison which states: "Despite the toughest air pollution regulations in the U.S., most Californians are still forced to breathe unhealthy air. Countless studies have documented that this sorry state of affairs is largely a result of motor vehicle use."

Please provide a table and include baseline numbers, and total numbers for the following air pollutants in the project area.

Please include studies for the following pollutants, all of which are known to harm health:

- CO Carbon Monoxide
- Nox Nitrogen Oxides
- HC Hydrocarbons
- ROG Reactive Organic Gases
- PM10 Particulates (i.e. from woodstoves)
- Pb Lead
- SO2 Sulfur Dioxide
- O3 Ozone & SMOG from cars
- Radioactive Matter (i.e. from woodstoves)
- Poisons & Pesticides
- CO2 Carbon Dioxide
- Methyl Bromide (used in fumigating homes)

Although particulates from woodsmoke are identified as a respiratory risk, its extreme health hazard, other than a cancer risk, in the role of lung diseases is not discussed.

- * Please include a reference to the article which states "60,000 U.S. residents per year die from breathing particulates at or below legally allowed levels" - written by Joel Schwartz EPA
- * Please discuss the cancer risk from particulates.
- * Please recommend as mitigation measures that wood stoves be prohibited, including certified wood stoves.
- * Please identify complete Federal & State Air Quality standards. Methyl Bromide (used in home fumigation) was not included.

Because families living near the proposal need to know the risks to their children's health is much higher than air quality standards suggest. The American Lung Association would be happy to help furnish such information.

- * Please request comments from either the local or National American Lung Association.
- ** It is important for the public to understand how the health of senior citizens, children, babies and sensitive people are harmed more by air pollution than the general public.
- * Please describe how Federal and State Air quality standards are health risk guidelines for healthy male adults - not for less robust humans such as the elderly or asthmatic children.
- * Please explain that the amount of air pollution allowed by Federal and State Air quality standards is enough to cause serious respiratory problems in senior citizens, children, babies and sensitive people.
- * Please clearly explain the detrimental health effects of the project on children and babies with lung problems because of the air toxins. Especially downwind of the asphalt plant.
- * Please explain how this area already exceeds federal and state levels for Safe air. Please describe how this proposal will make the air quality here worse (not better) - even more of a health hazard.
- * Please include full page color photographic examples to illustrate existing air quality problem. Because far more people understand a photo than an explanation and most people are not familiar with our air quality problem here. The Ozone violations of Carmel Valley or smog over the City of Monterey would be good examples.

* Please identify the quantities and persistence of all air pollutants to be generated by the proposed project. If the decision makers do and the public does not have a complete inventory of pollutants and know how long

33

they remain hazardous, they can not make intelligent decisions.

* Please identify the human health risks related to the toxicity and cumulative effects of all air pollutants to be generated by the proposed project. If the public does not understand the long and short term health risks of the various pollutants, they can not make intelligent decisions.

According to a report done in 1990 for the EPA by Tom Addison: "Analyzing the effects of only one pollutant often was justified by the inaccurate conclusion that CO serves as an 'indication of the full range of pollutants'. The effects of a project on the full range of air pollutants, however, can NOT be estimated by CO emissions. In general, increasing the average travel speed on a freeway from a congested, stop-and-go condition to a steady flow decreases the emissions of both CO and total HC (hydrocarbons), but INCREASES the emissions of NO (oxides of nitrogen). Furthermore, the impacts of CO are localized, but the formation of ozone from HC and NO affects the larger air basin".

* Please describe the worst case possibility of the synergetic (combined) effects of the air pollutants from the project.

* Please describe worst case human health hazards from the air pollution generated by the project. Not just ambient air, but breathing level air by a sensitive person walking in the vicinity of the proposed project.

* Please discuss the health impacts of increased air pollution on the Vegetation including Monterey Pine Forest and all the wildlife life within.

* Please specifically describe the effects of the increased air pollution on BABY wildlife - like birds, squirrels and deer.

* Please chart the cancer and poison risks from each air pollutant and their expected volume. Use Sax's Manual "Dangerous Properties of Chemicals.

* Please include a copy of a Material Data Safety Sheet (MSDS) for each of the air pollutants identified on pages 14-3.

Your page numbers do not match your table of contents i.e. Climate and air quality.

34

*Fix this so it is correct and matches.

Cumulative Health Risk Standard

35

*Please include the human life risk assessment in number of additional risk of human death from the impacts per 1 million people;

*Please explain how the pollution quantity from construction vehicles is calculated?

Visual & Aesthetic

36

Please describe how many buildings would be taller than existing structures and could be seen from the Monterey Peninsula or from Highway 1.

Glare from light at night can be an enormous nuisance. For example: The Spanish Bay parking lot lights up the entire Asilomar Beach, and glares all night long, along the entire western seafront of Pacific Grove. The glare shines in the windows of homes and cars. It shines in the eyes of pedestrians. The glare can be seen distinctly for 20 miles out to sea. The glare can be seen distinctly from the air, flying over Santa Cruz, Carmel Valley and Big Sur.

36

* Please detail the visual pollution from light sources at night and its impact on neighbors and wildlife.

* Please detail the visual impacts of the proposal from the air - from aircraft - for both day and night. Please provide aerial color photographs of the project now; and depict how it would change with the proposal.

High Pay vs Low Pay Jobs:

37

* Please identify and describe the number of permanent positions that the project will generate that would pay a high enough salary to allow the employee to qualify for a loan to buy a family house on the Monterey Peninsula.

* Please identify and describe the number of permanent positions that the project will generate that would pay a high enough salary to allow the employee to buy one of the "inclusionary housing units" that are a part of this plan.

* Please identify the amount of income necessary to qualify for a loan of \$265,900 - the median home value in the project area, which is used to determine the amount of "inclusionary housing".

Unexploded Ordnance (Ammunition)

38

The map on page 4.6-4 does NOT MATCH the ATSDR unexploded ordnance map or the UXO & Toxics EA/IS FT ORD Infrastructure Improvement Program Map on page 44.

Your EIR map shows fewer areas where unexploded ammunition could exist. *Exchange your map for the more complete maps identified above.

I have read documents which describe 100 pound sacks of TNT being found in huge quantities. Other reports describe chemical weapons.

There is not enough information in the DEIR on the type of ordnance that could be left including chemical weapons and TNT. Give us more information on that.

There is not enough information in the DEIR on the risk from the ordnance that could be left including chemical weapons and TNT. Give us more information on that.

Tell us what the largest unexploded bomb found so far is. Describe the damage it can do to humans.

Re-evaluate the impacts of the unexploded ordnance.

Quantify the risk of people being harmed by the unexploded ordnance after the Army has finished UXO cleanup.

Compare that risk to a similarly non-urban area where there is no known unexploded ordnance.

There is no heavy metal data or maps. Complete a study of heavy metals and how they could affect human health of future residents and visitors.

To conclude this UXO risk is "less than significant" is recklessly irresponsible.

39

This UXO risk is significant and unavoidable unless a 100% cleanup is performed.

Prepare an Alternative that does a 100% cleanup of the UXO.

prepare mitigation that mandates a 100% cleanup of the UXO.

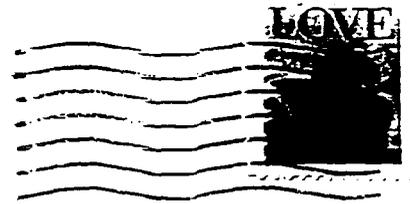
39

Include a map of the existing and proposed drinking water wells and overlay a map of the existing and expected toxic plume in the groundwater drifting away from the landfill. You can contact David Eisen of the Army Corps of Engineers for a map of the plume.

40

Signed,
David Dilworth, 408-624-6500

Ray Golden
P.O. Box 59
Carmel, CA 93921-0059



FORT ORD REUSE AUTHORITY
100 12th St BLDG 2880
MARINA CA 93933

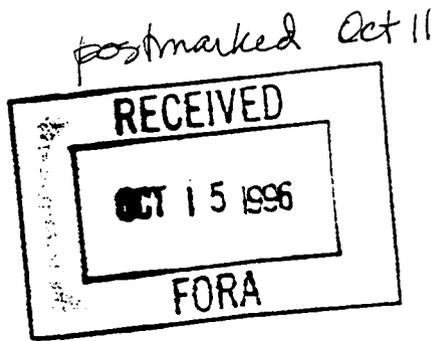
RECEIVED
MEMORANDUM

DATE: 10-7-96
RE: ENVIRONMENTAL IMPACT REPORT
TO: FORT ORD REUSE AUTHORITY
100 12th St BLDG 2880
MARINA CA 93933

I am concerned about any new demands on our already overdrawn water supplies and adding to the congestion on our roads. I would like you to prepare a new draft environmental impact report that analyzes all direct and cumulative impacts of this additional growth, especially where the new water is to come from or cut back your reuse plan.

SIGNED: Alice Golden
Alice Ray Golden
P.O. Box 59
Carmel, CA 93921-0059

TOPS FORM 4150 PLEASE REPLY NO REPLY NEEDED



October 11, 1996

Attn: All FORA Board Members
100 12th Street Bldg. 2880
Marina, CA 93933

Dear FORA,

I presented a 1991 U.S. Army Corp of Engineers Report FINAL SITE INVESTIGATION and an E.P.A. (1996 and 1991) report on Monday, October 7, 1996 regarding the Fort Ord army base.

I realize the urge to move ahead, but there is a serious water problem that needs to be addressed and it needs to be done immediately. In the first report; page 1-13 (last paragraph) states only 27 groundwater samples were obtained. This is only 27 total for a 46 square mile site (not enough); page 1-14 (last paragraph) states that before samples were tested, they were pre-filtered through a disposable 0.45 micron filter. Most of the heavy metals were caught in this filter. Page 1-5 (second paragraph) states boring only went down between 20 and 45 feet. This is not deep enough. In the very end of this report there are water chemistry analysis that report heavy metals (page 20). Please notice nickle. In ten samples it exceeds between 150% to 300% the maximum allowable limit which is 100%. This is after it was pre-filtered!! Nickle is a serious carcinogen and causes everything from fatigue to death, I am attaching E.P.A. and ATSDR information on this. Nickle also originates from stainless steel, cast iron, batteries, pesticides, electroplating, and many other items that are found in military landfills.

In questioning the Army and USEPA, I have been told they are gone now and not to worry about them. Well, where did they go? Charcoal filtering, which is the system being used for cleanup does not remove them.

The 1991 August 1996 E.P.A. reports states the metals are still there under THREATS and CONTAMINATES and that they have been found in Fort Ord AND Monterey County wells. Recently, the Army and USEPA have told me they are now calling them "background metals". "Background" is supposed to mean "naturally occurring". There is good reason and facts to suspect this toxic metal has been making its way into our water supply from the base. You folks need to do something about this or our wonderful peninsula will someday be a deserted hazardous waste site.

Christine Bettencourt
Seaside, CA
(408)899-4479

P.S. A forensic scientist from the Citizens Clearing House for Hazardous Waste has been assisting me on researching this issue. There is more information regarding this problem. Please feel free to contact me.

353-1

Nickel

Abdominal cramps
Bilirubin, increase in serum
Birth weight, suspected of causing low
Blood, increase in reticulocytes and leukocytes in the
Body temperature, cool
Breathing, irregular
Bronchitis
Cancer
Cardiac arrest
Chromosomal aberrations

Convulsions
Coronary constriction, suspected of causing
Cough
Cyanosis
Death
Delirium
Dermatitis; allergic, contact
Diarrhea
DNA, interacts with
Emphysema
Epigastric pain
Fatigue

Giddiness
Headaches
Hypoglycemia, suspected of causing
Incoordination
Kidney damage, suspected of causing
Lethargy
Liver atrophy, suspected of causing
Metal fume fever
Muscle pain
Myocardial depression, suspected of causing

Nausea
Pneumonia
Respiration, increased rate or depth of
Salivation, excessive
Sperm abnormalities, suspected of causing
Substernal pain
Testicular degeneration, suspected of causing
Vertigo
Vision loss
Vomiting
Weakness

2-553-2

*This is a partial attachment,
which was submitted earlier
SU # 278*

FORT ORD

CALIFORNIA

EPA ID= CA7210020676

EPA REGION 9

Monterey County

2 miles north of Monterey

Site Description

The 29,440-acre Fort Ord site was established in 1917 by the U.S. Army as a maneuver area and field artillery target range. Prior to closing in September 1994, the base's primary mission was training infantry military personnel. Several areas of contamination exist on-site. The facility contained leaking waste tanks, containers of waste oil and various automotive chemicals, chemical storage areas, oil-waste separators, target ranges, and landfills. One on-site area is a 150-acre landfill that was primarily used to dispose of residential waste, as well as small amounts of commercial waste. Other areas include a former fire drill pit, motor pool maintenance areas, small dump sites, and small arms target ranges. An 8,000-acre firing range, and other limited areas on-site, pose threats from unexploded ordnance. Approximately 40,000 people obtain drinking water from wells located within 3 miles of the site. The Salinas River alluvial basin, El Toro Creek, and Monterey Bay border the site.

Site Responsibility:

This site is being addressed through Federal actions.

NPL LISTING HISTORY

Proposed Date: 07 14 89

Final Date: 02 21 90

Threats and Contaminants

On-site groundwater and soil are contaminated with heavy metals, fuel hydrocarbons, and volatile organic compounds (VOCs). Contaminants have been detected in groundwater samples collected from Fort Ord and Monterey County Water District water supply wells. On-site soils in several vehicle maintenance and motor pool areas, and minor dump sites, have been contaminated with chemicals that spilled onto the ground. In addition, soils at the beach target ranges are contaminated with lead. Coming into direct contact with

contaminated soils may pose a potential health threat to on-site workers, as well as employees of the Fort Ord Army base. Unexploded ordnances on an 8,000-acre firing range and limited on-site areas also pose health threats. Should site-related contaminants migrate off site through the soils or groundwater, the Salinas River, El Toro Creek, and Monterey Bay could be affected.

Cleanup Approach

This site is being addressed in four stages: interim actions and three long-term remedial phases focusing on cleanup of the entire site, the Fritzsche Army Airfield practice fire pit, and the Fort Ord Landfill.

Response Action Status

Interim Actions: The Army initiated an investigation into the nature and extent of groundwater contamination. Preliminary findings showed an area of contamination known as the Fritzsche Army Airfield practice fire pit. As an interim action, the Army installed a groundwater and soil treatment system that has been operational since 1988. The contaminated groundwater is treated through carbon adsorption. A mixture of treated groundwater and necessary nutrients was sprayed on the contaminated soil adjacent to the groundwater treatment plant to facilitate the treatment of the soil. Soil treatment is nearing completion. The interim actions are focused on addressing primarily surface soils contaminated with fuels and waste oils from motor pools. Soils will be excavated and then treated at a treatment area using bioremediation or soil vapor extraction. In addition, in 1994, contaminated soil and debris, buried drums, and buried unexploded ordnance were removed.

Entire Site: In 1990, the Army began further investigations into the nature and extent of on- and off-site soil and groundwater contamination, as well as any ecological or health threats that may be present. The investigation has identified two dump sites, firing ranges, and a vehicle maintenance area that require cleanup actions. The Army expects to complete the investigation and make final cleanup decisions in the fall of 1997.

Fritzsche Army Airfield Practice Fire Pit: An investigation into the nature and extent of contamination in the Fritzsche Army Airfield practice fire pit began in 1990. A remedy is expected to be completed in mid-1995 that will establish groundwater cleanup standards for the area which must be met through the existing pump and treatment system.

Fort Ord Landfill: In 1994, the Army completed an investigation focusing on groundwater and soil contamination originating from the landfill. Monitoring wells were installed, surface soil samples collected, and soil gas samples taken. The EPA selected a remedy in the fall of 1994 that includes capping the landfill and installing a groundwater pump and treatment system. Design of the remedy is underway and expected to be completed in 1997.

Site Facts: Fort Ord is participating in the Installation Restoration Program, a specially funded program established by the Department of Defense (DOD) in 1978 to identify, investigate, and control the migration of hazardous contaminants at military and other DOD

treatment system. Design of the remedy is underway and expected to be completed in 1997.

Site Facts: Fort Ord is participating in the Installation Restoration Program, a specially funded program established by the Department of Defense (DOD) in 1978 to identify, investigate, and control the migration of hazardous contaminants at military and other DOD facilities. In 1990, Fort Ord signed an Interagency Agreement with the EPA and the State of California to address on- and off-site contamination. Fort Ord was officially closed in 1994. The Army is considering proposals for re-use of the land, but intends to retain a portion of the base for a reserve enclave. Several parcels have already been transferred to the State University system. Cleanup activities are not affected by base closure activities, except to the extent that they are being accelerated to facilitate more rapid land transfers.

Environmental Progress

The groundwater treatment system at the former fire pit and the removal of soil and debris have reduced the potential of exposure to contaminants while studies leading to the selection of final cleanup remedies are taking place at the Fort Ord site.

Site Repository

Monterey County Free Libraries, Seaside Branch, 550 Harcourt Avenue, Seaside, CA
93955

This page is maintained by the U.S. Environmental Protection Agency, Office of Emergency and Remedial Response. Web Page Revised on Aug 7, 1996

Content Comments: gartner.lois@epamail.epa.gov

Design Comments: ellis.julania@epamail.epa.gov

Oct 11

Briefly, here are just a few of the inadequacies of the draft EIR:

1. The creation of a Corrective Action Management Unit (CAMU) as a hazardous waste landfill. It's environmental effects are not adequately described.
2. Chemical Agent Identification Sets (CAIS). The environmental effects of this are not adequately addressed.
3. Draft EIR figure 4.6-4 does not accurately portray known and suspected unexploded ordnance areas. That map does not match the unexploded ordnance map of Fort Ord, Infrastructure and Improvements, April 1996, page 44, and figure 9 on page 45.

1
2
3

Sincerely,

Linda M. Neumann
444 Combs Court
Marina, CA 93933

Dear. wife

7303 Glen Haven Road
Laguna CA 92653
Sept. 29, 1996

OCT 1 1996

Hon. Sam Farr
214 Longworth Bldg.
Washington, DC 20515

(5) MG
10-18
DIT

Dear Representative Farr,

I am very concerned about the Food and Resource Authority's
EIR which is currently undergoing public review.
I believe the development project being proposed is
in larger than is desirable or sustainable. The
data in the DEIR is a best meager. Many
concerns are not adequately addressed. One
example: Where will the water come from to
supply a population of 72,000? The Monterey
Peninsula is already short of water! I believe
the DEIR is fatally flawed and must be
completely revised. Please help.

Sincerely,

Lin Wyant
(MR. LIN WYANT)

Assemblyman Bruce McPherson

(S) 10-18
014

OCT 01 1996

RT. 1, BOX 93
CARMEL, CA 93923
SEPT. 28, 1996

HONORABLE SAM FARR
1216 LONGWORTH BLDG.
WASHINGTON, D.C. 20515

RE: THE DRAFT EIR FOR THE FORMER FT. ORD.

DEAR REPRESENTATIVE FARR,
I CANNOT IMAGINE A MORE SEVERE
IMPACT ON THE MONTEREY PENINSULA THAN
THE ~~THE~~ PROPOSED 72,000 PERSON CITY AT
THE FORMER FORT ORD.

WATER IS MY MAIN CONCERN; BUT
AIR, TRAFFIC, AND LIFE STYLE ARE CONCERNS
THAT FOLLOW CLOSE BEHIND.

A PROPER EIR WITH FULL DISCLOSURES
AND PUBLIC AWARENESS IS IMPERATIVE.

A DEVELOPMENT MORE CONSISTENT WITH
THE PENINSULA'S CONSTRAINTS AND RESOURCES
SHOULD BE CONSIDERED.

SINCERELY,
Lana Price
LANA PRICE

Hon. Sam Farr
1216 Longworth Bldg.
Washington, DC 20515

CC-0-995 (5) MG 10-18 DH
Jim. Upton

Dear Sam:

I'm writing you today regarding my concern with the EIR for Fort Ord reuse, which I believe is deficient in several important ways.

First, it is inadequate in its expression of purpose and goals. The purpose of the projects involved is for reuse of the land and facilities, not for growth. I believe that the majority of the population of the Monterey Peninsula looks forward to maintaining and improving quality of life, not to increasing population growth.

The EIR is based on a projected growth of 34,000. Who wants to see this happen? Developers, big chain merchandisers? Economic growth does not automatically mean improvement of the quality of life, especially if it brings in tens of thousands of people, with the resulting increase in pressure on traffic, housing, schools, infrastructure, and so on.

Where is the necessary information presented regarding present housing, unemployment, and labor skills available? What types of jobs would be involved in the extensive development envisioned? Would they help our present pool of unemployed or underemployed?

Why is this an "all or nothing" plan? A fully conceptualized EIR would list alternatives, ranging from no development to a reuse plan consistent with environmental protection.

In a project as huge as this, it would seem wise to first develop base-line data. then project a tiered series of reuse plans, with each tier dependent prior results.

Consider just a few of the possible side-effects of such a mass development as now envisioned in the plan: air pollution due to the huge increase in vehicles on our roads, noise pollution in residential areas near those roads and highways, impact on our public beaches and parks, and so on.

And finally and reiteratively, where do we get the water?

Please consider these comments. I appreciate your hard work and will be eager to hear your opinions on these matters.

Sincerely,

Nada Kovalik

Nada Kovalik

1342 Jewell, Pacific Grove, CA 93950

November 8, 1996

Verbal Presentation
Regular FORA Mtg. - 4 pm

To: The FORA Board

deircom3

Fr: Fort Ord Study Group

Presented by: Karen Morgan & Lawrence Dickey

Re: 5/31/96 FORA Reuse Plan DEIR Comments

GENERAL COMMENTS

Members of the public have expressed their concerns about the adequacy of the DEIR and have repeatedly asked for a revised DEIR that would meet the mandates of CEQA. We are not alone in our concerns. The following are brief excerpts from some agencies that responded to the May 1996 Draft Environmental Impact Report:

Local Agency Formation Commission [10/11/96 James Colangelo, Executive Officer]

"It was [LAFCO's] hope that this document would adequately analyze the environmental issues associated with [sphere of influence amendments]. Unfortunately, as stated on page 3-11, this document does not focus on the potential impacts of the proposed boundary changes."

"...this fact will cause the affected jurisdictions to complete additional environmental analysis before filing with LAFCO..."

Monterey County Director of Planning [10/11/96 Bob Slimmon]

"The FORA reuse planning process was originally expected to result in a plan with parts which could be simply adopted by local governments. Instead, the FORA plan the environmental documentation has become increasingly general."

California State University Monterey Bay [10/11/96 David Salazar]

"In general, the Reuse Plan does not consider the sovereign redevelopment authority that was established by the Ft. Ord Reuse Authority Act...for the California State University, the governing body and owner of the CSUMB campus. As such, the baseline land use and financial planning assumptions of the Reuse Plan are inaccurate."

CSUMB also states that the EIR "relies on preparation of future design guidelines;..the Reuse Plan [design objectives] are too broad and general;..areas of 'regional importance' are not defined...and should include more visually significant areas than just the Hwy 1 corridor."

Monterey Bay National Marine Sanctuary [10/1/96 Terry Jackson]

"The Sanctuary finds that the DEIR has not responded adequately to our concerns expressed in comments on the Notice of Preparation, nor has the DEIR adequately characterized potential impacts and development alternatives to protect sanctuary resources and qualities."

Monterey County Water Resources Agency [9/20/96 Matt Zidar]

MCWRA asks "which specific areas of the Reuse Plan would be serviced by the initial 6,600 acre feet" of water.

Monterey Peninsula Water Management District [10/11/96 Darby Fuerst, General Manager]
MPWMD comments "...it's not clear if a... 'water supply assessment' document is required to be prepared for the Fort Ord Reuse Plan, to be in compliance with CEQA... To explain, [if a] "...project... would result in a net increase in water demand equivalent to water required for 500 dwelling units... the city or county is then required to include the 'water supply assessment' as part of the EIR (as per Water Code Section 10910 (d))"

Dept. of Army/Office of Garrison Commander [9/4/96 Col. Ila Metee-McCutcheon]
[The EIR] "needs to address the incompatibility of the golf course, equestrian center and public amphitheater proposals for the OU2 landfill site."

Regarding the issue of moving a portion of the Presidio of Monterey Annex (POM), Army notes that the "area shown for new military housing has up to 35% slope and much of the area is not suitable for housing construction."

"The Reuse Plan and proposed project in the EIR should be modified to be based on the present boundaries of the POM annex and be compatible with lands that have been screened for transfer."

Monterey County Environmental Health Dept. [8/26/96 Walter Wong, Director]

"There needs to be a discussion regarding the Army's long term responsibility for clean up if additional contamination is discovered, that is related to the Army's activity, after the transfer of the property."

UCSC [10/11/96 Graham Bice, Director of Physical & Environmental Planning]

UCSC states it will be "helpful if the EIR provided some evidence to demonstrate that Army will be able to provide adequate clean up to permit the proposed land uses."

UCSC also comments, the "policies and programs almost always fail to provide performance standards... the DEIR relies heavily on the future drafts of mitigation programs by local jurisdictions... [and, as an example] the Visual Resources policies and programs don't provide adequate mitigation under CEQA..."

Monterey Peninsula Regional Park District [10/11/96 Gary Tate, District Manager]

"The cumulative impact of increasing the former population of Ft. Ord by 250% without assessing the impact this may have on the public trust values of existing open spaces (not to mention other community issues such as traffic) is incomprehensible.

"The build-out scenario is excessive and should be scaled back."

Monterey County Housing Authority [10/11/96 James Nakashima, Exec. Director]

Housing Authority notes that the "vacancy rates used in the EIR have changed substantially...[that the] rental prices...are inaccurate...and that the jobs/housing ratio [is now] 1.36...[and that the document recommends that] no rental housing [is to be] developed for the first ten years..."

"In order to mitigate a possible imbalance in the jobs/housing balance and comply with State Housing Element Law, it's requested that the EIR incorporate a mitigation measure which would require 20% of housing developed at Fort Ord to be designated as Inclusionary Housing and deed restrictions for permanently affordable housing, to median and low income households..."

Bureau of Land Management [10/9/96 Robert Beehler]

BLM expresses its "concerns about continued efforts to expand development proposals to encompass lands that have been designated for habitat protection...[this] includes proposed highway corridors, water storage reservoirs, cemeteries, expansion of the...law enforcement training compound and construction of a law enforcement driving training course.

"The proliferation of proposed development activities within habitat reserves, serves to erode public and agency confidence in FORA's commitment to both the Habitat Management Plan and the Draft FORA Reuse Plan."

CSUMB/The Watershed Institute [10/11/96 Anna Weinstein, Policy Analyst]

"...found the DEIR to be unacceptably flawed relevant to proposed water requirements, scope of build out, and loss and degradation of unique habitats. On nearly every front, it fails to fulfil the requirements of CEQA that an EIR be 'a good faith effort at full disclosure of the impacts of a stable, finite, project description.'"

CSUMB/Watershed Institute notes that "Removal of 63% of coastal sage scrub habitat...is a significant impact.

"A 36% reduction of annual grassland...is a substantial reduction and should be deemed a significant impact.

"It is preposterous to conclude that the impact on coast live oak woodlands...would be 'less than significant.' The project proposes to demolish 34% of the total acreage at the former Fort Ord, which harbors the most significant stand of this [coast live oak] habitat in the State...the extent of the loss is unacceptable."

CSUMB/Watershed Institute concludes "Particularly disturbing is the [EIR's] consistent lack of specifics in project descriptions, potential impacts, and requirements with which to hold project operations accountable.

"We therefore recommend a substantial revision of the DEIR, with development scaled far back to better accommodate the real needs and limitations of surrounding cities and the Monterey Peninsula, and the extraordinary environmental legacy of former Ft. Ord."

November 8, 1996

Verbal Presentation
Regular FORA Mtg. - 4 pm
deircom

To: The FORA Board

Fr: Fort Ord Study Group
Presented by: Debra Mickelson

Re: 5/31/96 FORA Reuse Plan DEIR Comments
WATER

Members of the public have expressed their concerns about the adequacy of the DEIR and have repeatedly asked for a revised DEIR that would meet the mandates of CEQA. We are not alone in our concerns. The following are brief excerpts from some agencies that responded to the May 1996 Draft Environmental Impact Report:

Monterey Peninsula Water Management District [10/11/96 Darby Fuerst, General Manager]

"...the District is concerned that specific plans for allocation of the allocation of the 6,600 AFY supply, and development of the anticipated additional supplies, are not clearly identified and described in the draft EIR. At minimum, additional discussion should be included...that more specifically details the proposed water supply sources...

"The District disagrees with [the EIR pg 4-43] assertion 'that because of a number of reasonable, new water supply sources...the increased demand for water should be considered a less than significant impact at the project level.' ...the initial evaluation of water supply alternatives does not contain enough detail to adequately demonstrate that the lack of local water supplies can be adequately mitigated.

"An important general issue not addressed in the DEIR is the potential effect of approval of many new lots of record within the MPWMD boundary...the District is concerned that there may be an expectation of immediate water service...Such an expectation is unrealistic..."

Monterey County Water Resources Agency [9/20/96 Matt Zidar]

"The DEIR does not adequately address the significant impacts and cumulative effects to the water supply of the Salinas Valley...The policies and mitigation monitoring plan don't reduce the water supply significant impacts to levels of less than significant....The increased demand for water at the proposed project build-out will be a significant impact no matter what new source of water is found."

Dept. of Army/Office of Garrison Commander [9/4/96 Col. Ila Metee-McCutcheon]

"...the 6,600 acre feet of [Fort Ord] groundwater may not be used after completion of the Monterey County Water Resource Agency project. The Reuse Plan does not adequately address the need to participate in the development and replacement of the 6,600 AF of water allowed as an interim supply for the Army and for reuse or how this would be financed.

Dept of Army continued:

"...The long term supply also appears to incorrectly include continued use of the 6,600 acre feet of water from the Salinas Basin wells after the scheduled 1999 completion of the MCWRA project...

Army goes on to say, "The Reuse Plan and EIR state that cumulative demands for public services are not significant. The Army contends that the cumulative affects on the existing and proposed resources are significant and cannot be ignored..."

Monterey County Environmental Health Dept. [8/26/96 Walter Wong, Director]

"...The EIR and the Proposed Plan need to clarify the manner in which water will be made available to the areas planned for development...Sources of water supply and delivery should be identified and provision of such should be guaranteed prior to approval of development. Potential alternate supplies should be described and prioritized in some rational and explained manner. EIR should identify environmental issues and potential constraints...relating to the delivery of water...[and should] define 'critically deficient areas,' and 'assured long term water supply.'"

California Coastal Commission [10/10/96 Mark Delaplain, Federal Consistency Supervisor]

"We do not understand why a desal plant is being proposed west of Hwy 1, when it is equally feasible to site one east of Hwy 1...if desalination is to be pursued or supported by FORA, the EIR should evaluate the impacts associated with this planning decision, including growth inducement, public access and recreation opportunities, coastal views, and marine habitat issues."

UCSC [10/11/96 Graham Bice, Director of Physical & Environmental Planning]

"...the effects of the desalination plant as part of the project should be analyzed."

"The issue of groundwater depletion is ignored by the EIR. Moreover, the impact of seawater intrusion on water quality is dismissed...The EIR's confused analysis of groundwater recharge quality does not fully support the conclusion that the 'overall impact to groundwater recharge is considered less that significant.'

"...given the existing condition of the groundwater aquifer, there is a public concern over the ability of the water wells to assure even the 6,600 acre feet. Even if a user could theoretically squeeze 6,600 AF out of the groundwater basin, this does not mean that the impact is insignificant during Phase I. There could (and probably would) be adverse physical effects from continuing to drain an already overdrafted aquifer.

"...[a project] alternative should have been chosen which scales the amount of development to water availability."

Monterey Bay National Marine Sanctuary [10/1/96 Terry Jackson]

"We are concerned that the DEIR does not present an adequate evaluation of...environmental impacts for...the water supply and the potential development of a desalination plant...Sanctuary regulations prohibit discharges [to Monterey Bay] [and] the DEIR should not be considered adequate for the assessment, planning and development of the desal plant mentioned briefly in a few sections of the document...

"...A complete analysis of the need for such a facility, compared to other reasonable options and a cumulative impact analysis on impacts to the Monterey Bay National Marine Sanctuary, should be prepared...

[The Sanctuary] "...requests that FORA consider a project alternative that does not have such a large water supply budget, thus, precluding the need for construction of a desal plant with discharges to Monterey Bay."

To: The FORA Board

Fr: Fort Ord Study Group
Presented by: Ed Botsford

Re: 5/31/96 FORA Reuse Plan DEIR Comments
TRAFFIC

Members of the public have expressed their concerns about the adequacy of the DEIR and have repeatedly asked for a revised DEIR that would meet the mandates of CEQA. We are not alone in our concerns. The following are brief excerpts from some agencies that responded to the May 1996 Draft Environmental Impact Report:

Dept. of Army/Hdqtrs US Army Training & Doctrine Command

Construction Engineering Research Laboratories (CERL)

[8/27/96 Timothy J. Baker, Lt. Col., Director, Operations Base Realignment and Closure Office]

"It is the finding of CERL that the elements contained in the FORIS report and Reuse Plan differ substantially in some cases, both in terms of location and type of [traffic] improvement. This holds true when the costs and elements of the Business Plan are compared to the FORIS report...CERL estimates that approximately \$25 million in transportation costs contained in the Business Plan...are unaccounted for in the Reuse Plan.

"...inconsistencies must be rectified prior to, or addressed contemporaneously with the EDC application."

"An illustrative example of inconsistencies between documents and difficult to interpret elements within each [document] is...The Reuse Plan articulates a strategy to 'reduce demand' along 12th Street/Imjin and 'de-emphasize' Intergarrison Road/8th Street as a 'major vehicular route (pg 3-48, Vol 1). According to this Reuse Plan strategy, the campus and major development parcels would, in effect, be restricted from efficient access...Moreover, this strategy appears to contradict that of the Business Plan which programs upgrades to 4 and 2-lane arterials respectively.

"Due to the observed inconsistencies between the Reuse Plan and Business Plan, and the presence of apparent overlapping and difficult to interpret elements within each individual document, CERL recommends that [FORA] advance a single 'preferred' transportation plan that is internally consistent and provides ample economic justification for proposed improvements. A single 'preferred' transportation plan will not only expedite the Army's evaluation of the Reuse Plan and forthcoming EDC application, but also mitigate misunderstandings and misguided expectations of FORA's members and the regional community as a whole."

Transportation Agency of Monterey County (TAMC) [9/4/96 Joe Lopez, Transp Plng Super]

"The EIR inaccurately states that TAMC has 'established acceptable service levels as Level of Service D or better.' The TAMC Regional Transportation Plan 'strives to attain and maintain LOS C for the roadway network.'

"The DEIR states (pg 4-83): 'The proposed project combined with regional growth would result in worsening of several currently deficient roadway segments, and the degradation of several additional roadways to deficient levels (LOS E or F).' The [EIR] does not clearly identify which roadway sections will be significantly impacted by the proposed project.

"The DEIR fails to address significant traffic impacts resulting from the base land use plan...The failure to mitigate significant impacts and the lack of firm multimodal alternatives, incentives, and operating funds are fatal flaws in the current EIR. It is inconsistent with the CMP, RTP and SRTP as well as being beyond the regions' ability to fund.

"CEQA requires that the proposed project's impacts be disclosed. Since no analysis is provided as to the impact of post-2015 growth and Ultimate Build-out, CEQA Sections 15124, 15125, and 15126 are not being adhered to and full disclosure of project impacts is not provided.

"Plan alternatives should...be analyzed including altering the land use plan content, extent, or form to reduce trips and mitigate the traffic LOS....FORA has the responsibility to develop and implement a funding program necessary for Fort Ord's share of impact on the regional transportation system or reduce its land use plan pursuant to Section 15091 and Govt Code Sec 65089.

"It is FORA's duty under Section 15021 to minimize traffic impacts and environmental damage and balance competing public objectives. Since the fiscal impacts of base closure and post-closure status of public revenues is not quantified, it is unclear how FORA will balance the competing objectives of traffic congestion management, and economic recovery...

"Major revisions to the FORA plan and DEIR are needed to address TAMC's concerns...the issue of down scaling or rearranging ~~the~~ land use plan along the transit corridor is not presented as an alternative in either the FORA plan or EIR.

"...We recommend that a revised plan and DEIR be prepared and recirculated for public review."

Santa Cruz County Regional Transportation Commission [10/1/96 Linda Wilshusen, Exec. Dir.]

"We have expressed our concerns that the [regional traffic impacts of the proposed project] are not adequately discussed in the DEIR, and now it appears that this issue has been omitted from the Transportation Study."

Dept. of Transportation [10/11/96 Sarah Chesebro, Chief of Systems Planning & Programming]
DOT states "The traffic impacts to State Highway facilities are inaccurate or understated. The analysis of Level of Service is inconsistent with both Caltrans and TAMC's own analysis [referring to Table 4.7-3, pg 4-79].

"Much of the mitigation language uses vague phraseology such as, 'shall coordinate with,' and assist, support and participate in.

"District staff believes that the discussion of traffic mitigation measures are not consistent with CEQA Guidelines 15370.

"District staff believes that the final version of this document should contain a more direct and substantive commitment to funding mechanisms and mitigation measures.

MEMO
Monterey
September 10, 1996

lc

RE: Mr. Kris Lindstrom
P.O. Box 51008
Pacific Grove, CA 93950

DC
5 R D
10-2
D H

FORA PLAN

Mr. Lindstrom is concerned about the Fort Ord Reuse Plan. He thinks that it is "overly ambitious". Specifically, he believes that the Environmental Impact Report should be revised. He would like to know the Congressman's position on the plan.

Additionally, he would like to know if there are any other federal incentives to financially help the cities of Marina and Seaside. He thinks that the scale of development can be reduced at Fort Ord if other economic incentives are available.

361-1

Woodward Marine

P.O. Box 50, Moss Landing, CA 95039

Telephone (408) 633-2620

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mg
11-5
OH



NOV 01 1996

10-26-96

Hon Tom Farn
1216 Longworth Bldg.
Washington DC 20575

Please let the FORA Board know
that the FORA DEIR is wrong.

that a revised DEIR must be done

that the water that is now there
naturally must be the only water
planned for.

Thanks for your
continued good work!

Richard Woodward

cc Hon Bruce McPherson

362-1

Appendix A

List of Commenters in
Numerical Order

REUSE PLAN/EIR STATEMENTS: CHRONOLOGICAL ORDER		
STATEMENT NUMBER	NAME	DATE
1	Mancini, Tom	4-Apr
2	Monterey-Salinas Transit	24-May
3	Longley, John	30-May
4	Mancini, Tom	6-Jun
5	Sierra Club, Ventana Chapter	6-Jun
6	California State Department of Parks and Recreation	14-Jun
7	Del Rey Oaks, City of	20-Jun
8	Dickey, Laurence	20-Jun
9	Mancini, Tom	23-Jun
10	Beck, Gudrun	25-Jun
11	Rogers, Warren	25-Jun
12	Carmel-by-the-Sea, City of	27-Jun
13	Northern Salinas Valley Mosquito Abatement District	28-Jun
14	Nunn, Bud	1-Jul
15	Lindstrom, Kris	1-Jul
16	Tyksinski, Becky	1-Jul
17	Brooks, Barbara	1-Jul
18	Flavin, Sean	1-Jul
19	Dilworth, David	1-Jul
20	Ciesla, Ted	1-Jul
21	Fischer, John	1-Jul
22	Stark, Ed	1-Jul
23	Weaver, Mike/Highway 68 Coalition	1-Jul
24	McCloud, Sue	1-Jul
25	Crayne, Leslie	1-Jul
26	Elstob, Winston	1-Jul
27	Mickelson, Debra	1-Jul
28	Hawkins, Larry	1-Jul
29	Fenton, Larry	1-Jul
30	Save Our Waterfront Committee	1-Jul
31	Dickey, Laurence	1-Jul
32	Horquita, Sal	1-Jul
33	Fort Ord Toxics Project	1-Jul
34	University of California, Santa Cruz	1-Jul
35	Beck, Clark	1-Jul
36	Whitaker, Yoko	1-Jul
37	Hughes, Jim	1-Jul
38	Olesen, Terry	1-Jul
39	Bailey, Richard	1-Jul
40	Hooper, Stephen	1-Jul
41	Karas, Judy	2-Jul
42	Bartsch, Dolores & Rodney	2-Jul
43	Nissen, Ross	3-Jul
44	Baltezar, Bill	3-Jul
45	Brown, John & Trixie	8-Jul
46	Mickelson, Debra	11-Jul

Sheet1

47	Kuffner, Harvey	11-Jul
48	McCloud, Sue	11-Jul
49	Anderson, Linda	11-Jul
50	Fisher, Janice	11-Jul
51	Shepner, Robert	12-Jul
52	Fischer, John	12-Jul
53	Mickelson, Debra	12-Jul
54	Gandy, Curt	12-Jul
55	Sierra Club, Ventana Chapter	14-Jul
56	Monterey Bay Unified Air Pollution Control District	15-Jul
57	Monterey, City of	17-Jul
58	Robinson, Richard	21-Jul
59	Fischer, John	26-Jul
60	Del Rey Oaks, City of	29-Jul
61	Council Member Yadon	31-Jul
62	Council Member Zito	31-Jul
63	Council Member Huitt	31-Jul
64	Mayor Pro Tem Davis	31-Jul
65	Rogge, Eleanor	31-Jul
66	Nunn, Bud	31-Jul
67	Dilworth, David	31-Jul
68	Mickelson, Debra	31-Jul
69	Morgan, Karen	31-Jul
70	Perry, Connie	31-Jul
71	Dilworth, David	31-Jul
72	Rawitzer, Janet	1-Aug
73	Mayfield, Gordon/Highway 68 Coalition	1-Aug
74	Moran, Melanie	1-Aug
75	Condry, Mary	1-Aug
76	Dickey, Laurence	1-Aug
77	Anderson, Linda	1-Aug
78	Anderson, Clayton	1-Aug
79	Jorgenson, Peggy	1-Aug
80	Humann, Shirley	1-Aug
81	Christensen, Mark	1-Aug
82	Mickelson, Debra	1-Aug
83	Carmel-by-the-Sea, City of	2-Aug
84	Ungaretti, Louis	5-Aug
85	Santa Cruz County Regional Transportation Commission	5-Aug
86	Avila, Eleanor	5-Aug
87	Anderson, Clayton	6-Aug
88	Kuffner, Harvey	7-Aug
89	Anderson, Linda	7-Aug
90	Carmel Residents Association	7-Aug
91	Cavanaugh, Joe	7-Aug
92	Dickey, Laurence	7-Aug
93	Taylor, Gillian	7-Aug
94	Cochran, Annette	7-Aug
95	Morgan, Karen	7-Aug
96	Finley, Bernard	7-Aug
97	Jorgensen, Peggy	7-Aug

Sheet1

98	Dilworth, David	7-Aug
99	Ungaretti, Louis	7-Aug
100	Flavin, Sean	7-Aug
101	Nunn, Bud	7-Aug
102	Humann, Shirley	7-Aug
103	Mickelson, Debra	7-Aug
104	Ramos, Eric	7-Aug
105	Whitfield, Elliott	7-Aug
106	Anderson, Linda	7-Aug
107	Silva-Santella, Grace	7-Aug
108	Ramos, Eric	7-Aug
109	Bradshaw, Patty	7-Aug
110	Groves, George	7-Aug
111	Clayman, Adam	7-Aug
112	Davies, Marilyn	7-Aug
113	Robertson, Graeme	7-Aug
114	Haines, Jane	7-Aug
115	Botsford, Edward	7-Aug
116	Beck, Clark	7-Aug
117	Mathews, Mary Ann	7-Aug
118	Anderson, Clayton	7-Aug
119	Leonardich, Pete	7-Aug
120	Kuffner, Harvey	7-Aug
121	Wright, Constance	7-Aug
122	Laney, Frankie	7-Aug
123	Whitaker, Yoko	7-Aug
124	Mitteldorf, Arthur	7-Aug
125	McGlochlin, Dolores	8-Aug
126	Pacific Grove, City of	8-Aug
127	Smith, Sandra	8-Aug
128	Monterey Peninsula Chamber of Commerce	9-Aug
129	Bourne, Anne	9-Aug
130	Arnold, Jack	9-Aug
131	Meyer, L Bruce	9-Aug
132	Spehn, Mel	9-Aug
133	Anderson, Linda	9-Aug
134	Dickey, Laurence	9-Aug
135	Kuffner, Harvey	9-Aug
136	Christensen, Mark	9-Aug
137	Hawthorne, Sue	9-Aug
138	Humann, Shirley	9-Aug
139	Mickelson, Debra	9-Aug
140	unnamed	9-Aug
141	Mitchell, William & Jean	10-Aug
142	Billig, Melanie	12-Aug
143	Sweeney, Donald	12-Aug
144	Rosenoff, Wayne	12-Aug
145	Read, Missy	12-Aug
146	Larson, Evelyn	12-Aug
147	Wright, Nancy	12-Aug
148	Rider, Alyce	12-Aug

Sheet1

149	Nash, Phil	12-Aug
150	Bradshaw, Patty	12-Aug
151	Moore, Tom/Marina Coast Water District	12-Aug
152	Greenwood, Robert	13-Aug
153	Elms, Joan	13-Aug
154	Monterey-Salinas Transit	13-Aug
155	League of Women Voters of the Monterey Peninsula	14-Aug
156	Peccianti, Diane	14-Aug
157	Getchell, Robert	14-Aug
158	Baclagh, Theresa	15-Aug
159	Beck, Clark	15-Aug
160	Casty, Alan	16-Aug
161	Frasier, Ruth & Vince	20-Aug
162	Sand City, City of	20-Aug
163	Beck, Clark	20-Aug
164	Beck, Gudrun	20-Aug
165	Lindstrom, Kris	20-Aug
166	Serttunc, Jennifer	21-Aug
167	AMBAG	22-Aug
168	AMBAG	22-Aug
169	May, Tom	22-Aug
170	Flavin, Sean	22-Aug
171	Wright, Constance	22-Aug
172	Hawkins, Larry	22-Aug
173	Mathews, Mary Ann	22-Aug
174	Tyksinski, Becky	22-Aug
175	Leonardich, Pete	22-Aug
176	Mickelson, Debra	22-Aug
177	Cheshire, Ron	22-Aug
178	Humann, Shirley	22-Aug
179	Holmes, Maya	22-Aug
180	Morgan, Karen	22-Aug
181	Tyksinski, Paul	22-Aug
182	Fenton, Larry	22-Aug
183	Cochran, Annette	22-Aug
184	Eubanks, Frank	22-Aug
185	Bettencourt, Christine	22-Aug
186	Christensen, Mark	22-Aug
187	Lively, Ira	22-Aug
188	Nunn, Bud	22-Aug
189	Hale, Louise	22-Aug
190	Beck, Clark	22-Aug
191	Silva-Santella, Grace	22-Aug
192	McCloud, Sue	22-Aug
193	Radakovich, Miles	22-Aug
194	Briscoe, Mary	22-Aug
195	Dlouhy, Carolyn	22-Aug
196	Wilson, Thelma & Wally	22-Aug
197	University of California, Santa Cruz	23-Aug
198	Salinas, City of	23-Aug
199	Nissen, Ross	26-Aug

Sheet1

200	Monterey, City of	26-Aug
201	Tanous, Leo	26-Aug
202	Leonardich, Pete	27-Aug
203	Seaside, City of	27-Aug
204	Marina, City of	27-Aug
205	Eubanks, Frank	28-Aug
206	California State Lands Commission	3-Sep
207	US Army, TRADOC & CERL	3-Sep
208	Botsford, Edward	3-Sep
209	Kovalik, Nada	5-Sep
210	Transportation Agency for Monterey County (TAMC)	6-Sep
211	Coalition of Homeless Service Providers	6-Sep
212	Davis, John	7-Sep
213	US Army, DLIFLC & POM	12-Sep
214	May, Tom	13-Sep
215	Coalition of Homeless Service Providers (Jackson)	13-Sep
216	Gandy, Curt	13-Sep
217	Lindstrom, Kris	13-Sep
218	Dickey, Laurence	13-Sep
219	Leonardich, Pete	13-Sep
220	Mickelson, Debra & Anderson, Linda	13-Sep
221	Coalition of Homeless Service Providers (Reeder)	13-Sep
222	Foster, Duane	17-Sep
223	Monterey County Farm Bureau	20-Sep
224	Dansky, Dave	28-Sep
225	Fox, Frances	28-Sep
226	Woodsworth, William	30-Sep
227	Bailey, Michael & Debora	30-Sep
228	Price, Lana	30-Sep
229	O'Brien, Meighan	30-Sep
230	Harris, Tamara	1-Oct
231	Pacific Grove, City of	1-Oct
232	O'Brien, Meighan	1-Oct
233	Smith, Sandra & Stan	1-Oct
234	Nesbitt, Priscilla	2-Oct
235	Greenwood, Robert	2-Oct
236	Jones, unknown first name	2-Oct
237	Pinkerton, Laura	2-Oct
238	Ross, Mary	2-Oct
239	Trist, Beulah	2-Oct
240	Smith, Sandra & Stan	3-Oct
241	Baldock, Barbara	3-Oct
242	Carmel-by-the-Sea, City of	3-Oct
243	Jacobs, Zane	3-Oct
244	Ayres, Jeanette	3-Oct
245	Hill, Ted	3-Oct
246	Rolander, Lori	3-Oct
247	Cartier, Christina	4-Oct
248	Monterey Bay National Marine Sanctuary	4-Oct
249	Marina, City of	4-Oct
250	Hoivik, Lisa	4-Oct

251	Ayres, Jeanette	4-Oct
252	Ramscott, Sydney	4-Oct
253	Williams, Peggy	5-Oct
254	Worth, Darby	7-Oct
255	Gaytan, Charlyne	7-Oct
256	Smith, Bret	7-Oct
257	Austin, Diana Joy	7-Oct
258	Keeler, Robin	7-Oct
259	Grossman, Arlen	7-Oct
260	Children's Services International	7-Oct
261	Pinkerton, Laura	7-Oct
262	Warder, Ian	7-Oct
263	Crawford, Malcolm	7-Oct
264	McClintock, Nancy	7-Oct
265	Stone, LaVonne	7-Oct
266	Caling, Bruce	7-Oct
267	Morgan, Karen	7-Oct
268	Kuffner, Harvey	7-Oct
269	Gandy, Curt	7-Oct
270	Kuffner, Kay	7-Oct
271	Evan, Mark	7-Oct
272	Mitteldorf, Arthur	7-Oct
273	Sevier, David	7-Oct
274	Beck, Clark	7-Oct
275	Lewis, Robert	7-Oct
276	Fischer, John	7-Oct
277	Gaytan, Charlyne	7-Oct
278	Bettencourt, Christine	7-Oct
279	Bailey, Richard	7-Oct
280	Parks, Ray	7-Oct
281	Botsford, Edward	7-Oct
282	Humann, Shirley	7-Oct
283	Tyksinski, Paul	7-Oct
284	Anderson, Clayton	7-Oct
285	Dickey, Laurence	7-Oct
286	Skidmore, Howard	7-Oct
287	Niendenberg, Warren	7-Oct
288	Nunn, Bud	7-Oct
289	Olesen, Terry	7-Oct
290	Worth, Darby	7-Oct
291	Carr, Don	7-Oct
292	Jorgensen, Peggy	7-Oct
293	Anderson, Linda	7-Oct
294	Meuser, Michael	7-Oct
295	Mickelson, Debra	7-Oct
296	Keene, Chris	7-Oct
297	Silva-Santella, Grace	7-Oct
298	California Native Plant Society	7-Oct
299	Davi, Jeff	7-Oct
300	Woodworth, William	7-Oct
301	unnamed	7-Oct

302	unnamed	7-Oct
303	Beck, Marilyn	8-Oct
304	Cowan, Judy	8-Oct
305	Fort Ord Study Group	8-Oct
306	Bureau of Land Management	9-Oct
307	Pacific Grove Residents Association	9-Oct
308	Harms, Bobbie	9-Oct
309	unknown last name, Penelope	9-Oct
310	Cowan, Bruce	9-Oct
311	Neidenberg, Warren	9-Oct
312	Osborne, Joy	9-Oct
313	Stevens, Joyce	9-Oct
314	Durein, John & Nancy	9-Oct
315	Winton, Bob & Joan	9-Oct
316	Williams, Peggy	9-Oct
317	Lebowitz, Susan	9-Oct
318	Marina, City of	10-Oct
319	Goodman, Eva	10-Oct
320	Marina Coast Water District	10-Oct
321	Hale, Robert	10-Oct
322	Hentges, Joan	10-Oct
323	Warder, Ian	10-Oct
324	Lebowitz, Susan	10-Oct
325	Mid-Peninsula Housing Coalition	11-Oct
326	Santiago, Gilbert	11-Oct
327	Carmel-by-the-Sea, City of	11-Oct
328	Watershed Institute, CSUMB	11-Oct
329	California State University Monterey Bay	11-Oct
330	LAFCO	11-Oct
331	Monterey County	11-Oct
332	Pacific Grove, City of	11-Oct
333	University of California, Santa Cruz	11-Oct
334	Housing Authority of the County of Monterey	11-Oct
335	Sierra Club, Ventana Chapter	11-Oct
336	California Coastal Commission	11-Oct
337	Mickelson, Debra	11-Oct
338	Hampson, Larry	11-Oct
339	Monterey Peninsula Chamber of Commerce	11-Oct
340	Monterey Peninsula Water Management District	11-Oct
341	Monterey Peninsula Regional Park District	11-Oct
342	California State Department of Transportation	11-Oct
343	Creative Problem Solving Institute	11-Oct
344	Olesen, Terry	11-Oct
345	Burych, Donna	11-Oct
346	Elm, Patricia	11-Oct
347	Scrimshaw, George & Helen	11-Oct
348	Fort Ord Toxics Project	11-Oct
349	Weaver, Mike/Highway 68 Coalition	11-Oct
350	Fry, Virginia	11-Oct
351	Dilworth, David	11-Oct
352	Golden, Alice	11-Oct

353	Bettencourt, Christine	11-Oct	
354	Neumann, Linda	11-Oct	
355	Wyant, Lin	illegible date	
356	Price, Lana	illegible date	
357	Kovalik, Nada	illegible date	
358	Morgan, Karen & Dickey, Laurence	8-Nov	
359	Mickelson, Debra	8-Nov	
360	Botsford, Edward	8-Nov	

Late Comments

361	Lindstrom, Kris	9-Dec	
362	Woodward, Richard	9-Dec	

Appendix B

List of Commenters in
Alphabetical Order

REUSE PLAN/EIR STATEMENTS: ALPHABETICAL ORDER			
NAME	DATE	STATEMENT	NUMBER
AMBAG	22-Aug		167
AMBAG	22-Aug		168
Anderson, Clayton	1-Aug		78
Anderson, Clayton	6-Aug		87
Anderson, Clayton	7-Aug		118
Anderson, Clayton	7-Oct		284
Anderson, Linda	11-Jul		49
Anderson, Linda	1-Aug		77
Anderson, Linda	7-Aug		89
Anderson, Linda	7-Aug		106
Anderson, Linda	9-Aug		133
Anderson, Linda	7-Oct		293
Arnold, Jack	9-Aug		130
Austin, Diana Joy	7-Oct		257
Avila, Eleanor	5-Aug		86
Ayres, Jeanette	3-Oct		244
Ayres, Jeanette	4-Oct		251
Baclagh, Theresa	15-Aug		158
Bailey, Michael & Debora	30-Sep		227
Bailey, Richard	1-Jul		39
Bailey, Richard	7-Oct		279
Baldock, Barbara	3-Oct		241
Baltezar, Bill	3-Jul		44
Bartsch, Dolores & Rodney	2-Jul		42
Beck, Clark	1-Jul		35
Beck, Clark	7-Aug		116
Beck, Clark	15-Aug		159
Beck, Clark	20-Aug		163
Beck, Clark	22-Aug		190
Beck, Clark	7-Oct		274
Beck, Gudrun	25-Jun		10
Beck, Gudrun	20-Aug		164
Beck, Marilyn	8-Oct		303
Bettencourt, Christine	22-Aug		185
Bettencourt, Christine	7-Oct		278
Bettencourt, Christine	11-Oct		353
Billig, Melanie	12-Aug		142
Botsford, Edward	7-Aug		115
Botsford, Edward	3-Sep		208
Botsford, Edward	7-Oct		281
Botsford, Edward	8-Nov		360
Bourne, Anne	9-Aug		129
Bradshaw, Patty	7-Aug		109
Bradshaw, Patty	12-Aug		150
Briscoe, Mary	22-Aug		194
Brooks, Barbara	1-Jul		17

Brown, John & Trixie	8-Jul	45
Bureau of Land Management	9-Oct	306
Burych, Donna	11-Oct	345
California Coastal Commission	11-Oct	336
California Native Plant Society	7-Oct	298
California State Department of Parks and Recreation	14-Jun	6
California State Department of Transportation	11-Oct	342
California State Lands Commission	3-Sep	206
California State University Monterey Bay	11-Oct	329
Caling, Bruce	7-Oct	266
Carmel Residents Association	7-Aug	90
Carmel-by-the-Sea, City of	27-Jun	12
Carmel-by-the-Sea, City of	2-Aug	83
Carmel-by-the-Sea, City of	3-Oct	242
Carmel-by-the-Sea, City of	11-Oct	327
Carr, Don	7-Oct	291
Cartier, Christina	4-Oct	247
Casty, Alan	16-Aug	160
Cavanaugh, Joe	7-Aug	91
Cheshire, Ron	22-Aug	177
Children's Services International	7-Oct	260
Christensen, Mark	1-Aug	81
Christensen, Mark	9-Aug	136
Christensen, Mark	22-Aug	186
Ciesla, Ted	1-Jul	20
Clayman, Adam	7-Aug	111
Coalition of Homeless Service Providers	6-Sep	211
Coalition of Homeless Service Providers (Jackson)	13-Sep	215
Coalition of Homeless Service Providers (Reeder)	13-Sep	221
Cochran, Annette	7-Aug	94
Cochran, Annette	22-Aug	183
Condry, Mary	1-Aug	75
Council Member Huitt	31-Jul	63
Council Member Yadon	31-Jul	61
Council Member Zito	31-Jul	62
Cowan, Bruce	9-Oct	310
Cowan, Judy	8-Oct	304
Crawford, Malcolm	7-Oct	263
Crayne, Leslie	1-Jul	25
Creative Problem Solving Institute	11-Oct	343
Dansky, Dave	28-Sep	224
Davi, Jeff	7-Oct	299
Davies, Marilyn	7-Aug	112
Davis, John	7-Sep	212
Del Rey Oaks, City of	20-Jun	7
Del Rey Oaks, City of	29-Jul	60
Dickey, Laurence	20-Jun	8
Dickey, Laurence	1-Jul	31
Dickey, Laurence	1-Aug	76
Dickey, Laurence	7-Aug	92
Dickey, Laurence	9-Aug	134

Dickey, Laurence	13-Sep	218
Dickey, Laurence	7-Oct	285
Dilworth, David	1-Jul	19
Dilworth, David	31-Jul	67
Dilworth, David	31-Jul	71
Dilworth, David	7-Aug	98
Dilworth, David	11-Oct	351
Dlouhy, Carolyn	22-Aug	195
Durein, John & Nancy	9-Oct	314
Elm, Patricia	11-Oct	346
Elms, Joan	13-Aug	153
Eistob, Winston	1-Jul	26
Eubanks, Frank	22-Aug	184
Eubanks, Frank	28-Aug	205
Evan, Mark	7-Oct	271
Fenton, Larry	1-Jul	29
Fenton, Larry	22-Aug	182
Finley, Bernard	7-Aug	96
Fischer, John	1-Jul	21
Fischer, John	12-Jul	52
Fischer, John	26-Jul	59
Fischer, John	7-Oct	276
Fisher, Janice	11-Jul	50
Flavin, Sean	1-Jul	18
Flavin, Sean	7-Aug	100
Flavin, Sean	22-Aug	170
Fort Ord Study Group	8-Oct	305
Fort Ord Toxics Project	1-Jul	33
Fort Ord Toxics Project	11-Oct	348
Foster, Duane	17-Sep	222
Fox, Frances	28-Sep	225
Frasier, Ruth & Vince	20-Aug	161
Fry, Virginia	11-Oct	350
Gandy, Curt	12-Jul	54
Gandy, Curt	13-Sep	216
Gandy, Curt	7-Oct	269
Gaytan, Charlyne	7-Oct	255
Gaytan, Charlyne	7-Oct	277
Getchell, Robert	14-Aug	157
Golden, Alice	11-Oct	352
Goodman, Eva	10-Oct	319
Greenwood, Robert	13-Aug	152
Greenwood, Robert	2-Oct	235
Grossman, Arlen	7-Oct	259
Groves, George	7-Aug	110
Haines, Jane	7-Aug	114
Hale, Louise	22-Aug	189
Hale, Robert	10-Oct	321
Hampson, Larry	11-Oct	338
Harms, Bobbie	9-Oct	308
Harris, Tamara	1-Oct	230

Hawkins, Larry	1-Jul	28
Hawkins, Larry	22-Aug	172
Hawthorne, Sue	9-Aug	137
Hentges, Joan	10-Oct	322
Hill, Ted	3-Oct	245
Hoivik, Lisa	4-Oct	250
Holmes, Maya	22-Aug	179
Hooper, Stephen	1-Jul	40
Horquita, Sai	1-Jul	32
Housing Authority of the County of Monterey	11-Oct	334
Hughes, Jim	1-Jul	37
Humann, Shirley	1-Aug	80
Humann, Shirley	7-Aug	102
Humann, Shirley	9-Aug	138
Humann, Shirley	22-Aug	178
Humann, Shirley	7-Oct	282
Jacobs, Zane	3-Oct	243
Jones, unknown first name	2-Oct	236
Jorgensen, Peggy	7-Aug	97
Jorgensen, Peggy	7-Oct	292
Jorgenson, Peggy	1-Aug	79
Karas, Judy	2-Jul	41
Keeler, Robin	7-Oct	258
Keene, Chris	7-Oct	296
Kovalik, Nada	5-Sep	209
Kovalik, Nada	illegible date	357
Kuffner, Harvey	11-Jul	47
Kuffner, Harvey	7-Aug	88
Kuffner, Harvey	7-Aug	120
Kuffner, Harvey	9-Aug	135
Kuffner, Harvey	7-Oct	268
Kuffner, Kay	7-Oct	270
LAFCO	11-Oct	330
Laney, Frankie	7-Aug	122
Larson, Evelyn	12-Aug	146
League of Women Voters of the Monterey Peninsula	14-Aug	155
Lebowitz, Susan	9-Oct	317
Lebowitz, Susan	10-Oct	324
Leonardich, Pete	7-Aug	119
Leonardich, Pete	22-Aug	175
Leonardich, Pete	27-Aug	202
Leonardich, Pete	13-Sep	219
Lewis, Robert	7-Oct	275
Lindstrom, Kris	1-Jul	15
Lindstrom, Kris	20-Aug	165
Lindstrom, Kris	13-Sep	217
Lively, Ira	22-Aug	187
Longley, John	30-May	3
Mancini, Tom	4-Apr	1
Mancini, Tom	6-Jun	4
Mancini, Tom	23-Jun	9

Marina Coast Water District	10-Oct	320
Marina, City of	27-Aug	204
Marina, City of	4-Oct	249
Marina, City of	10-Oct	318
Mathews, Mary Ann	7-Aug	117
Mathews, Mary Ann	22-Aug	173
May, Tom	22-Aug	169
May, Tom	13-Sep	214
Mayfield, Gordon/Highway 68 Coalition	1-Aug	73
Mayor Pro Tem Davis	31-Jul	64
McClintock, Nancy	7-Oct	264
McCloud, Sue	1-Jul	24
McCloud, Sue	11-Jul	48
McCloud, Sue	22-Aug	192
McGlochlin, Dolores	8-Aug	125
Meuser, Michael	7-Oct	294
Meyer, L Bruce	9-Aug	131
Mickelson, Debra	1-Jul	27
Mickelson, Debra	11-Jul	46
Mickelson, Debra	12-Jul	53
Mickelson, Debra	31-Jul	68
Mickelson, Debra	1-Aug	82
Mickelson, Debra	7-Aug	103
Mickelson, Debra	9-Aug	139
Mickelson, Debra	22-Aug	176
Mickelson, Debra	7-Oct	295
Mickelson, Debra	11-Oct	337
Mickelson, Debra	8-Nov	359
Mickelson, Debra & Anderson, Linda	13-Sep	220
Mid-Peninsula Housing Coalition	11-Oct	325
Mitchell, William & Jean	10-Aug	141
Mitteldorf, Arthur	7-Aug	124
Mitteldorf, Arthur	7-Oct	272
Monterey Bay National Marine Sanctuary	4-Oct	248
Monterey Bay Unified Air Pollution Control District	15-Jul	56
Monterey County	11-Oct	331
Monterey County Farm Bureau	20-Sep	223
Monterey Peninsula Chamber of Commerce	9-Aug	128
Monterey Peninsula Chamber of Commerce	11-Oct	339
Monterey Peninsula Regional Park District	11-Oct	341
Monterey Peninsula Water Management District	11-Oct	340
Monterey, City of	17-Jul	57
Monterey, City of	26-Aug	200
Monterey-Salinas Transit	24-May	2
Monterey-Salinas Transit	13-Aug	154
Moore, Tom/Marina Coast Water District	12-Aug	151
Moran, Melanie	1-Aug	74
Morgan, Karen	31-Jul	69
Morgan, Karen	7-Aug	95
Morgan, Karen	22-Aug	180
Morgan, Karen	7-Oct	267

Morgan, Karen & Dickey, Laurence	8-Nov	358
Nash, Phil	12-Aug	149
Neidenberg, Warren	9-Oct	311
Nesbitt, Priscilla	2-Oct	234
Neumann, Linda	11-Oct	354
Niedenberg, Warren	7-Oct	287
Nissen, Ross	3-Jul	43
Nissen, Ross	26-Aug	199
Northern Salinas Valley Mosquito Abatement District	28-Jun	13
Nunn, Bud	1-Jul	14
Nunn, Bud	31-Jul	66
Nunn, Bud	7-Aug	101
Nunn, Bud	22-Aug	188
Nunn, Bud	7-Oct	288
O'Brien, Meighan	30-Sep	229
O'Brien, Meighan	1-Oct	232
Olesen, Terry	1-Jul	38
Olesen, Terry	7-Oct	289
Olesen, Terry	11-Oct	344
Osborne, Joy	9-Oct	312
Pacific Grove Residents Association	9-Oct	307
Pacific Grove, City of	8-Aug	126
Pacific Grove, City of	1-Oct	231
Pacific Grove, City of	11-Oct	332
Parks, Ray	7-Oct	280
Peccianti, Diane	14-Aug	156
Perry, Connie	31-Jul	70
Pinkerton, Laura	2-Oct	237
Pinkerton, Laura	7-Oct	261
Price, Lana	30-Sep	228
Price, Lana	illegible date	356
Radakovich, Miles	22-Aug	193
Ramos, Eric	7-Aug	104
Ramos, Eric	7-Aug	108
Ramscott, Sydney	4-Oct	252
Rawitzer, Janet	1-Aug	72
Read, Missy	12-Aug	145
Rider, Alyce	12-Aug	148
Robertson, Graeme	7-Aug	113
Robinson, Richard	21-Jul	58
Rogers, Warren	25-Jun	11
Rogge, Eleanor	31-Jul	65
Rolander, Lori	3-Oct	246
Rosenoff, Wayne	12-Aug	144
Ross, Mary	2-Oct	238
Salinas, City of	23-Aug	198
Sand City, City of	20-Aug	162
Santa Cruz County Regional Transportation Commission	5-Aug	85
Santiago, Gilbert	11-Oct	326
Save Our Waterfront Committee	1-Jul	30
Scrimshaw, George & Helen	11-Oct	347

Seaside, City of	27-Aug	203
Serttunc, Jennifer	21-Aug	166
Sevier, David	7-Oct	273
Shepner, Robert	12-Jul	51
Sierra Club, Ventana Chapter	6-Jun	5
Sierra Club, Ventana Chapter	11-Oct	335
Sierra Club, Ventana Chapter	14-Jul	55
Silva-Santella, Grace	7-Aug	107
Silva-Santella, Grace	22-Aug	191
Silva-Santella, Grace	7-Oct	297
Skidmore, Howard	7-Oct	286
Smith, Bret	7-Oct	256
Smith, Sandra	8-Aug	127
Smith, Sandra & Stan	1-Oct	233
Smith, Sandra & Stan	3-Oct	240
Spehn, Mel	9-Aug	132
Stark, Ed	1-Jul	22
Stevens, Joyce	9-Oct	313
Stone, LaVonne	7-Oct	265
Sweeney, Donald	12-Aug	143
Tanous, Leo	26-Aug	201
Taylor, Gillian	7-Aug	93
Transportation Agency for Monterey County (TAMC)	6-Sep	210
Trist, Beulah	2-Oct	239
Tyksinski, Becky	1-Jul	16
Tyksinski, Becky	22-Aug	174
Tyksinski, Paul	22-Aug	181
Tyksinski, Paul	7-Oct	283
Ungaretti, Louis	5-Aug	84
Ungaretti, Louis	7-Aug	99
University of California, Santa Cruz	1-Jul	34
University of California, Santa Cruz	23-Aug	197
University of California, Santa Cruz	11-Oct	333
unknown last name, Penelope	9-Oct	309
unnamed	9-Aug	140
unnamed	7-Oct	301
unnamed	7-Oct	302
US Army, DLIFLC & POM	12-Sep	213
US Army, TRADOC & CERL	3-Sep	207
Warder, Ian	7-Oct	262
Warder, Ian	10-Oct	323
Watershed Institute, CSUMB	11-Oct	328
Weaver, Mike/Highway 68 Coalition	1-Jul	23
Weaver, Mike/Highway 68 Coalition	11-Oct	349
Whitaker, Yoko	1-Jul	36
Whitaker, Yoko	7-Aug	123
Whitfield, Elliott	7-Aug	105
Williams, Peggy	5-Oct	253
Williams, Peggy	9-Oct	316
Wilson, Thelma & Wally	22-Aug	196
Winton, Bob & Joan	9-Oct	315

	Woodsworth, William	30-Sep	226	
	Woodsworth, William	7-Oct	300	
	Worth, Darby	7-Oct	254	
	Wright, Constance	7-Oct	290	
	Wright, Constance	7-Oct	121	
	Wright, Nancy	12-Aug	147	
	Wyant, Lin	illegible date	355	

Late Comments

	Lindstrom, Kris	9-Dec	361	
	Woodward, Richard	9-Dec	362	