

TABLE 2 WRITTEN COMMENTS ON THE SCOPING REPORT RECEIVED THROUGH SEPTEMBER 4, 2012

Name	Date	BRP Reassessment Comments – Written Comments																		Project-Specific Comments				
		Scoping Report Document	Input Process	FORA Procedures	Economic/ Jobs	EcoTourism/ Recreation	Blight/Urban Footprint	Hazardous Materials	Housing	Transportation	Water	Trails/Access	Open Space	Habitat/ Wildlife	National Monument	Native Americans	CSUMB/ UC/MPC	Aesthetics	Other	Monterey Downs/ Horse Park	Veterans' Cemetery	Eastside Parkway	East Garrison	Other
Colleen Ingram	08/29/12			x																				
Karin Locke	08/29/12			x			x			x		x												
Susan Schiavonne	08/29/12			x					x			x	x				x			x				
Chuck Della Sala, Mayor, City of Monterey	08/30/12				x				x			x	x				x							
Doug Yount	08/30/12	x		x													x							
Eric Petersen, Pedali Alpini, Inc.	08/30/12		x	x	x	x	x		x	x	x	x	x	x			x			x	x	x	x	x
Ross Davidian	08/30/12				x			x	x	x	x										x			
William Collins, BRAC	08/30/12	x		x				x			x	x	x											
Lisa Brinton, City of Seaside	08/31/12	x		x	x		x		x		x						x		x	x				
Tom Moore, Sierra Club	08/31/12	x		x	x		x		x			x	x		x		x				x			
John Hutcherson	09/01/12						x						x											
Lawrence Dick	09/02/12	x						x				x	x											
Jane Haines	09/03/12	x	x	x																				
Mary Ann Matthews, CA Native Plant Society	09/03/12			x			x				x	x	x	x										
Pam Krone-Davis	09/03/12	x			x		x		x				x				x	x		x				
Pat McNeill	09/03/12			x	x		x		x				x	x							x			
Amy White, LandWatch	09/04/12	x		x					x		x		x										x	
B. Leone	09/04/12			x																	x			
Connie Quinlan	09/04/12	x					x		x	x											x		x	x

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Denyse Frischmuth, Communities for Sustainable Monterey County	09/04/12				x	x			x						x									
Douglas Yount, City of Marina	09/04/12	x																						
Eduardo Ochoa, CSUMB	09/04/12	x		x	x		x	x	x								x	x					x	x
Fred Meurer, City of Monterey	09/04/12	x								x									x					
Gail Morton, forU	09/04/12	x	x	x			x					x	x	x										
Greg Furey	09/04/12			x	x			x	x					x		x					x	x		x
Kay Cline, Sustainable Seaside	09/04/12				x	x	x		x		x	x	x	x	x		x							
LeVonne Stone, Fort Ord Environmental Justice Network	09/04/12		x		x			x	x											x				
Michael Stamp, attorney for Keep Fort Ord Wild	09/04/12	x	x	x	x	x		x	x	x	x	x		x	x					x			x	x
Mike Weaver, Highway 68 Coalition	09/04/12	x			x	x				x				x						x				x
Paula Koepsel	09/04/12	x			x				x					x							x			x
Suzanne Worcester	09/04/12	x	x	x	x	x	x		x	x	x	x		x		x				x	x			
Vicki Nakamura, MPC	09/04/12	x			x							x		x		x							x	x
Vicki Pearse	09/04/12			x	x	x			x	x	x				x									

Vickie Bermea

From: Colleen Ingram [colleen.ingram@gmail.com]
Sent: Wednesday, August 29, 2012 3:22 PM
To: Darren McBain
Subject: The Future of Fort Ord

To whom it May Concern:

Please know that the current state of FORA is not operating in the best interest of Fort Ord's preservation. We need to eliminate the conflict of interest that seems to be behind the decisions to develop this treasured land. I hope that you will be receptive to the suggestions made by Monterey county citizens tonight.

Thank You,
Colleen Ingram

Vickie Bermea

From: Karin Locke [wisteriagma@comcast.net]
Sent: Wednesday, August 29, 2012 2:44 PM
To: Darren McBain
Subject: Comments 8 29 2012 Public meeting

FORA Executive Houlemard must step down, Potter needs to step down and new leadership must finish the remaining six years of implementation. It is clear the ecology and environment is not the priority of the leadership, the leadership is the driver for senseless development and there is massive and ever growing distrust in the community.

Money and development are the primary focus. *The place of nature and open space is not honored here*, it is trampled on by clear cutting, secret deals and politics that run on greased wheels of money. In 20 to 25 years, if development continues here, this area will be rotten and in a quagmire. Many, many scientists have said that if we do not stop development, the path towards our species is one of destruction, think about your great grandchildren and the world they will live in. Monterey County does not have a climate plan, greenhouse gas will increase, and the ocean will be affected by the amount of desalination plants to fulfill the future water needs.

Sensitive development on lands already blighted is the only option, we have learned to live with the unacceptable, and it is time to stop this and change our course of action.

Karin Locke

878 Bayview Ave

Pacific Grove CA 93950

I came today because I have a very deep concern that this process has been conducted in reverse in regard to at least one area of planning..... according the FORA plan, the three E's are to be addressed in all planning....I was concerned about what was being done to accommodate wildlife movement when I first attended the reassessment meetings held in spring....I indicated this in my letter sent June 10.

After that rushed response I did more research. Looking at the Seaside project at Lightfighter Drive, I did not see any area that looked like a wildlife corridor, despite being told by the mayor there was one. I looked up the approved plan on the city website. Instead, the skimpy line of trees along Highway 1 have been relabeled the wildlife corridor (city of Seaside approved plan date August 2010). This is not a wildlife corridor, and represents a dangerous area for deer or other animals. The noise and reverberation of the traffic alone is a hazard. I walk in this area and see the tracks and that section used by deer now, would be completely destroyed and replaced with a large heat producing paved parking lot for a department store, with a thin line of little puff trees. There are also no obvious wildlife corridors on the southern side, though open areas in csu and others still exist. Also a linkage from Gen Jim Moore to Second street is planned to run right over the area where deer etc. now graze and move to and from the dunes area. I then looked up the FORA wildlife habitat plan only to see that it was "not ready for public release." This alarmed me even more.....how do you have a reuse plan review when you have not completed a crucial part of the plan to be reviewed, especially part of the plan that is key to meeting the environmental intent of the original plan....I looked at the maps and

even with whispering oaks, did not see clear wildlife corridors available that enable movement toward the bay...I contacted my supervisor and asked for clarification wherein there also was a negative in terms of concrete plans that involved corridors and movement.

On August 10, (the date of the board meeting) I read in the Herald that the reuse plan review must be done by Jan. 1.....a few weeks back there was a notice in the paper that the habitat plan was going to be released in 2012 but with no date and apparently at the last minute since it is now September.....this is blatantly backwards in terms of planning.....to release the habitat plan just before the deadline for reviewing the reuse plan, and at the point where all of the cities are rushing to get developers in before anyone blinks, puts the situation where no time for discussion exists in this regard.....I think it should be pointed out clearly and loudly that this is a backward process - that the imperative of the three E's has not been met in terms of the environment and that the entire plan NEEDS to be reviewed and all players need to come back to the table with wildlife conservation in mind and find ways to knit back together pieces you have chopped up so that deer and other creatures retain the ability to move through what is left of their range.....they need access to the shore, along the shore and back up on the OTHER SIDE – they do not read detour signs, understand freeways or know they have to turn around and return the same way.

The original For Ord Reuse Plan, on page 333, section 4.4 states, in regard to the Conservation Element of the Plan:

"The element, which is State mandated, requires that the natural resources within the boundaries of former Ft. Ord are supervised in perpetuity and that these resources are not diminished. The element's contents respond to California environmental laws, including the Clean Water Act and the Clean Air Act.

The conservation element overlaps provisions found in the land use, circulation, open space and safety elements. It differs, however, from other portions of the reuse plan in its almost exclusive orientation toward natural resources. In addition, this element recognizes that natural resources, more so than any other issues discussed in the plan, are not constrained by jurisdictional boundaries. Vehicles traveling within and outside the former Fort Ord will impact air quality both within and outside the areas. And animal species may move through the former Fort Ord on their way through the region unaware of borders drawn on maps.

I am alarmed when I see FORA maps of designated wildlife areas split in three with planned roads and a route 68 bypass that actually creates a wildlife island where certain death of the animals is assured. Snakes are especially disturbed by traffic vibration. No one is talking about it in the scoping report by your organization.

I am calling on the FOR A to back up and really do the three E's – include the environment as a full player – and have all be involved in reviewing their plans for land use in this ecosystem in the light of wildlife movement & preservation. The FOR A Board must correct errors made in initial planning that conflict with best practice. We need to plan for wildlife movement as much as our own movement.....we are creating development into a wildlife habitat and want to preserve it. We seem to have no compunction in making and using trails through that "habitat" and plans for recreational uses. Yet we don't provide for trails and access for the wildlife we say we

appreciate so they can traverse the areas we have taken away.... At least go back and rework the planning so as to cause the least harm. There are models that can be used; no one seems discussing this....University ecology staff and grad students could help—there is information on how to do this.

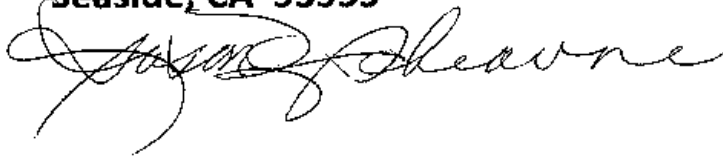
I cannot help but add a comment about the proposed Monterey Downs project – it is a breach of the intention of this plan and FOR A, the County and the City of Seaside are wrong to allow this grandiose development to defeat the purpose of the original intention of this plan, to destroy what was originally designated to be protected.

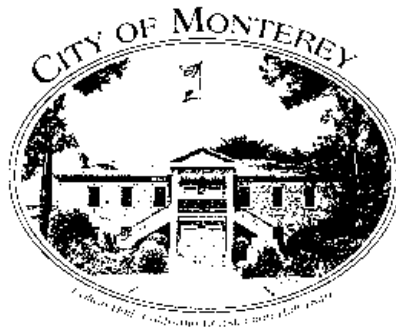
Thank you for listening,

Susan L Schiavone

1505 Ord Grove Ave.

Seaside, CA 93955

A handwritten signature in black ink, appearing to read "Susan L. Schiavone", written in a cursive style.



August 10, 2012

Mayor:
CHUCK DELLA SALA

Councilmembers:
LIBBY DOWNEY
JEFF HAFFERMAN
NANCY SELFRIDGE
FRANK SOLLECITO

City Manager:
FRED MEIGREB

Darren McBain, Project Manager
Fort Ord Reuse Authority
920 Second Avenue, Suite A
Marina, CA 93933

Via Fax: 831-883-3675

RE: Base Reuse Plan Reassessment

Dear Mr. McBain,

Thank you for the opportunity to provide early input in the reassessment process. The purpose of reassessing the Base Reuse Plan (BRP) is to determine whether redevelopment of the base to date is meeting the goals of the BRP, which are Economic Development, Education, and Environmental Protection. Since adoption of the BRP in 1997, entitlements have been issued for six major developments; the California State University campus has been developed, and 18,000 acres of land has been designated as permanent open space/habitat by the federal government. Therefore, the City believes that FORA and the member jurisdiction have made great progress towards the BRP goals. However, much more progress towards economic development is required with respect to replacing jobs lost through the base closure process. Progress also needs to be made to install essential infrastructure to ensure constructive reuse of the former Fort Ord.

With respect to the City of Monterey's property specifically, our staff is looking forward to working with FORA staff during the reassessment process to make minor adjustments to the Caltrans and Fort Ord Expressway rights-of-way to make them concurrent with parcel boundaries and consistent with proposed land uses.

We look forward to continuing our participation throughout the BRP reassessment process. If you have specific questions regarding our comments, please contact Elizabeth Caraker, Principal Planner at 646-1739.

Sincerely,

Chuck Della Sala
Mayor

S



FORT ORD REUSE AUTHORITY

920 2nd Avenue, Suite A, Marina, CA 93933
Phone: (831) 883-3672 – Fax: (831) 883-3675
Website: www.fora.org

FORT ORD REUSE PLAN REASSESSMENT COMMENT FORM SCOPING REPORT

FORA welcomes public input on the Scoping Report, as it relates to the 1997 Fort Ord Base Reuse Plan reassessment process. The 1997 Base Reuse Plan was created as a 40-60 year plan. The overall goal of the reassessment process is to explore whether objectives and policies in the Base Reuse Plan should be updated to better address current conditions and meet the community's future needs. A Reassessment Report will be prepared for this purpose. The Reassessment Report will include a range of options that the FORA Board of Directors may wish to consider for possible future action related to the Base Reuse Plan.

The Scoping Report includes a summary of information collected about the implementation of the Base Reuse Plan since it was approved 15 years ago. The Scoping Report also includes an analysis of current and future economic and market conditions and trends. The Scoping Report will be used as a basis for identifying possible options for consideration that may be included in the Reassessment Report for future consideration or action by the FORA Board.

Comments submitted by 5:00 PM on September 4, 2012, will be included in the Final Scoping Report scheduled for release on September 7, 2012. Comments received after this deadline will be accepted but will not be included in the Final Scoping Report document and may not be included in the Board packet for the FORA Board meeting on September 14, at which the Board will consider accepting the Scoping Report. Comments can also be presented on September 14 at the FORA Board meeting, but those comments will not be included in the Final Scoping Report document.

Commenter Name:

Doug Yount

Address (Optional):

City of Marina

Email (Optional):

FORA cannot directly respond to each and every comment that is submitted; however, all comments will be reviewed.

Comments can be submitted to FORA by email: plan@fora.org; FAX: 831-883-3675; or mail to: FORA, 920 2nd Avenue, Suite A, Marina CA 93933. For more information about FORA or the Base Reuse Plan, visit the FORA website at www.fora.org or contact Darren McBain at FORA, (831) 883-3672.

Space for written comments is provided on the reverse side.



SIERRA CLUB
FOUNDED 1892

Doug Young, City of Marina

PLEASE SUBMIT COMMENTS BY 5:00 PM SEPTEMBER 4, 2012

COMMENTS

o Please reference and review
the Visioning report for
the LICMBEST property that
was recently completed

o Please review + reference
the SRI report prepared
recently for the County of
Monterey Economic Development
Committee

If additional space is needed, please attach additional sheets.

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Si tiene preguntas o necesita informacion o traduccion en espanol, favor de llamar a Jonathan Garcia o Darren McBain al 831-883-3672.

PEDALI ALPINI INC.



Eric Petersen, president
P O Box 2416
Salinas CA 93902
June 11, 2012

Fort Ord Reuse Authority
920 Second Ave #A
Marina CA 93933

Dear FORA:

This letter is regarding Fort Ord Base Reuse Plan reassessment process, and is the input from Pedali Alpini, Inc. Pedali Alpini is one of the oldest and most successful bicycle clubs in the United States. We have an interest in maximizing the open space on the former Fort Ord, both for local recreation and for the economic benefits from such recreation and tourism.

We believe that the reassessment report completely misses what is really needed, which is the best way Fort Ord can be used in the future. We believe that the report is less a realistic assessment than a service to developers. Long term, the best way to use Fort Ord is to capitalize on the many positive factors of the area, then use the blighted areas to support and enhance the area. National monuments can be a boon to local economies, but must be protected as much as possible. This will require some changes in the local economy, as some people will need to learn new jobs.

Every remaining area of oak forest or meadow should be incorporated into the new Fort Ord National Monument. The Bureau of Land Management has demonstrated that they have the ability to manage the area very well, and as much land as possible should be transferred to their control.

The remaining blighted areas must be rehabilitated as quickly as possible. There is no excuse for the old barracks to still remain this long after the Army left. Getting rid of the old barracks must be a high priority.

We need to maximize the potential of the former Fort Ord. This will support a wide range of recreational activities, including cycling. It will also improve the economy of Monterey County, and provide constructive diversions for our young people. Crucial to this is that all proposals must receive extensive consideration, since a mistake can endanger or even destroy this area forever.

Most important must be the people of the Monterey County area, particularly those in the Salinas/Marina/Seaside communities. The profit of a few much not be considered to be more important than the general good.

It should be a simple process to achieve this vision. First and foremost, the size of the new Fort Ord National Monument must be as large as possible, not only including the current land controlled by the Bureau of Land Management, but also other adjacent land. There must be coordination between BLM and other entities in the area, including Monterey County Parks, California State Parks, California State University – Monterey Bay, and all the others. Particularly important would be with the National Park Service regarding Pinnacles National Monument and the DeAnza Trail.

Specific Suggestions

Pedali Alpini would like to make specific comments regarding the future of the FORA area:

1. The area devoted to the National Monument should be maximized and fully protected.
2. The proposed veterans' cemetery needs to have the highest priority, including full funding. The veterans' cemetery should be protected within the boundaries of the National Monument. Sites other than the currently-proposed site should be considered, such as East Garrison or off of Highway 68.
3. Projects such as massive horse racing facilities which could seriously impact the National Monument need to be prohibited. The Marina Equestrian Center should be brought into the process to provide input regarding a suitable equestrian facility.
4. Projects which expand and enhance the National Monument should be encouraged and supported. These would include the proposed Monterey Bay Youth Camp, which can be protected within the boundaries of the National Monument.
5. The only campground nearby is at Laguna Seca County Park, and it is not available all the time. The Bureau of Land Management should be encouraged to establish campgrounds suitable for the National Monument. These could be at areas on the periphery of the National Monument, such as off Hwy 68, at East Garrison, and Parker Flats. While campgrounds should be designed for all users, including RV campers and equestrians, the campgrounds should also be designed in a manner appropriate for a National Monument, such as the campground at East Pinnacles.
6. "Habitat preservation" should continue as BLM is doing it now, with attention given to sensitive areas and trails routed around, but also with the trail system enhanced for all users.

7. BLM should be encouraged to allow more public events similar to those which have existed in the area for years. Facilities should be developed for other smaller events such as large picnics, weddings, etc; those facilities should be located around the outside parts of the National Monument with the internal areas preserved to the greatest extent possible.
8. Appropriate transportation improvements need to be considered, especially public transportation to trailheads. Monterey-Salinas Transit needs to be brought in to the process. Subject to funding limitations, MST needs to provide access to the major trailheads and other important areas of the National Monument. (Perhaps Federal funding could be provided for this purpose).
9. More housing has already been approved than will be needed in Monterey County for decades, possibly for the rest of this century. In addition to the Fort Ord area, there is the Future Growth Area in Salinas, plus other developments in communities up the Salinas Valley. There needs to be a moratorium for any new housing projects in the Fort Ord area until there is a real need for the housing. Existing housing which can be rehabilitated should be the highest housing priority, followed by in-city projects which have been already started.
10. The Eastside Parkway should be eliminated until such time as it might actually be needed for many reasons. It will be disruptive to habitat including sensitive species, and to the new National Monument. It is supposed to connect at the north end to the Westside Bypass west of Salinas, which will not be funded or built for many years (if ever), resulting in another "Road to Nowhere." Mostly, though, it simply is not needed.

The potential of the area which used to be Fort Ord is enormous, but can easily be totally bungled. This area needs close attention while giving local input a high priority. There are mistakes which could easily be made which will ruin this treasure for those of us which have the greatest interest and needs, including veterans and local hikers, cyclists, and equestrians. Every step needs to be done carefully, as there are mistakes which could ruin the area forever.

If further information or clarification is needed, the best way to reach me is via e-mail at eric939@redshift.com, or by telephone at (831)758-2474. Thank you for the opportunity to provide input to the important local issue!

Yours truly,


Eric Petersen
President
Pedali Alpini, Inc



FORT ORD REUSE AUTHORITY

920 2nd Avenue, Suite A, Marina, CA 93933
Phone: (831) 883-3672 - Fax: (831) 883-3675
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Commenter Name: Ross Davidian

Address (Optional): Seaside

Email (Optional): _____

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Space for written comments is provided on the reverse side.



PLEASE SUBMIT COMMENTS BY 5:00 PM SEPTEMBER 4, 2012

COMMENTS

I am so disappointed by all of the comments tonight focused on one proposed project. Where have these 'anti-development' people been since the base closed? The horse has left the barn on much of the development discussion. The retired folks who no longer need jobs are fighting like hell to stop new jobs so they can trespass on lands they do not own and are going to ruin our long term health of our community. Preserving 20,000+ acres out of 28,000 acres means we will not be a San Jose.

Do not forget the promises that the hard hit communities have been depending on for years - return some of the lost jobs, focus on developing education and other jobs, honor our soldiers who served. We had for decades the people who lived, worked, ~~served~~ and supported Fort Ord and our community was still a nationally known destination for our natural resources - we can have 1/2 those jobs, housing, traffic and water use and still be a nationally known destination. When Ford was open, we didn't have open access. All these folks seem to have

If additional space is needed, please attach additional sheets.

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Si tiene preguntas o necesita informacion o traduccion en espanol, favor de llamar a Jonathan Garcia o Darren McBain al 831-883-3672. Last - the munitions must get Make the fed clean up all of their mess. Don't sacrifice public safety for trees that have grown since all the soldiers (who often desecrated these lands) were ordered off the base. Don't save trees at the expense of curious kids who will explore and pay a price for it they when they come across munitions that remain b/c ~~the~~ people want to save scrub trees.

Vickie Bermea

From: Collins, William K CIV (US) [william.k.collins.civ@mail.mil]
Sent: Thursday, August 30, 2012 9:38 AM
To: Darren McBain
Subject: RE: Reassessment Scoping Document (UNCLASSIFIED)
Attachments: BRAC Comments to DRAFT FORA Reassessment Scoping Document.docx; Figure 11.ppt

Classification: UNCLASSIFIED
Caveats: NONE

Hi Darren: Attached are our comments to the Draft Scoping Report. Please let me know if there are any questions regarding our comments. Thank you for the opportunity to comment.

Bill

William K. Collins
Wildlife Biologist
Fort Ord BRAC Office
(831) 242-7920
Fax (831) 393-9188

-----Original Message-----

From: Darren McBain [<mailto:Darren@fora.org>]
Sent: Tuesday, August 28, 2012 11:41 AM
To: Collins, William K CIV (US)
Subject: RE: Reassessment Scoping Document (UNCLASSIFIED)

Hi Bill, thanks for your message and I'm sorry for the slow reply. It's shaping up to be a hectic week. If you could please email me your edits that would be great. I realize you don't have the document in Microsoft Word (to allow "track changes") but if you want to copy and paste the existing wording from the PDF into a Word document and then track changes from there, that would be one way to do it. Or if you just email me some blocks of text with the correct info, I'll provide that to the consultants. Either way, I'll get your corrections to the consultants just as soon as I receive it. Sometime before Sept. 4 would be ideal so we can get it included in the scoping report. Thanks- Darren

Darren McBain

Associate Planner

Fort Ord Reuse Authority (FORA)

darren@fora.org

(831) 883-3672

920 2nd Ave., Suite A Marina, CA 93933

From: Collins, William K CIV (US) [<mailto:william.k.collins.civ@mail.mil>]
Sent: Monday, August 27, 2012 10:07 AM
To: Darren McBain
Subject: Reassessment Scoping Document (UNCLASSIFIED)

Classification: UNCLASSIFIED
Caveats: NONE

Hi Darren: The BRAC Office has reviewed the scoping document and would like to provide some changes to the cleanup discussion prior to the next version of the scoping document or in the reassessment. How would you like to receive the Army's comments? Thanks

Bill

William K. Collins
Wildlife Biologist
Fort Ord BRAC Office
(831) 242-7920
Fax (831) 393-9188

Classification: UNCLASSIFIED
Caveats: NONE

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Caveats: NONE

Fort Ord BRAC Office Comments on the DRAFT FORA Reassessment Scoping Report

1. Page 4-165, left column, Mitigation Measures and New Programs. It reads “All construction plans for projects in the City/County shall be reviewed by the Presidio of Monterey, Directorate of Environmental and Natural Resources Management (DENR), to determine if construction is planned within known or potential OE areas. Construction crews and contractors must stop all work and contact the federal police when ordnance is found. The contractor must have an Army approved plan for OE avoidance and the avoidance must be performed by trained OE specialist.” We understand this is one of the mitigation measures identified in the Final Fort Ord Reuse Plan EIR (page 4-88), and is identified as “Program A-1.3 in the Final Reuse Plan (page 445). It is unclear why this needs to be highlighted as a “new program” in the Scoping Report. In addition, please note that Presidio of Monterey DENR no longer manages BRAC property at the former Fort Ord. Construction plans on Army owned property must be coordinated with the U.S. Army Fort Ord BRAC Office. Since the Reuse Plan was finalized, the Army has made significant progress in its investigation and cleanup of munitions and explosives of concern (MEC; formerly “ordnance and explosives”) at the former Fort Ord. Several records of decision (RODs) have been signed under CERCLA, supporting transfer of numerous parcels to FORA and other entities. For these properties, the property transfer documents (deeds) contain notices and requirements regarding MEC safety that apply to the specific parcels. Therefore, the description of Program A-1.3 should be updated to reflect the current practices that provide for MEC safety during planning and implementing a construction project. These practices include: MEC recognition and safety training for people engaging in ground disturbance activities and construction support. Whether these practices are recommended or required can be found in the property transfer deed for the specific parcel(s). Additionally, entities with jurisdiction over portions of Fort Ord property have adopted an ordnance ordinance that ensures MEC safety considerations are incorporated into construction projects, which may be appropriate to be noted here.
2. The second mitigation measure that appears on the same page reads “Before construction activities commence on any element of the proposed project, all supervisors and crew shall attend an Army sponsored OE safety briefing. This briefing will identify the variety of OE that are expected to exist on the installation and the actions to be taken if a suspicious item is discovered.” We understand this is one of the mitigation measures identified in the Final Fort Ord Reuse Plan EIR (page 4-88), and is identified as “Program A-1.4 in the Final Reuse Plan (page 445). It is unclear why this needs to be highlighted as a “new program” in the Scoping Report. The description of Program A-1.4 should be updated to reflect that, the property transfer deed should be checked to determine if the training is required at a specific parcel. The Army provides MEC recognition and safety training to any interested party.
3. Page 4-204, right column, last paragraph. Please revise the last sentence to, “Clean-up activities relating to water quality occur at four areas located in the northern portion of former Fort Ord (Operable Unit (OU) 1, OU-2, Sites 2/12, and OU Carbon Tetrachloride Plume (OUCTP).
4. Page 4-211, Hazardous Materials Cleanup. The second sentence needs to be revised because lead is addressed at Fort Ord by the Army’s Hazardous Toxic Waste program and not as part of the Military Munitions Response Program. Also, delete “and other weapons” since the munitions program investigates and remediates munitions and explosives of concern. It should also be clarified that the lead based paint and asbestos used as construction materials are being addressed as necessary by FORA.
5. “Cleanup Authorization Process” on page 4-211. Right column. The last sentence of the section includes a statement “...and open space areas where public access is not envisioned receiving lowest levels of cleanup.” The statement should be modified to reflect that public access is envisioned in areas designated for open space reuse. For example, in munitions response sites located within areas managed by BLM, public access is allowed.
6. On “Munitions Cleanup Activities” starting on page 4-211:

- a. At the bottom of page 4-211, right column, the “impact area” is cited as encompassing 7,446 acres. It is unclear how this acreage was calculated. The Track 3 Impact Area Munitions Response Area addressed by the 2008 Record of Decision (OE-0647) is 6,560 acres.
- b. At the bottom of page 4-211, right column. The text suggests that, outside of the Impact Area and ESCA areas, the remainder of 12,000 acres of munitions cleanup are part of “the remaining sites, found elsewhere on the former Fort Ord and under the U.S. Army’s responsibility.” This description is confusing since it does not correspond with the information provided in the second subsequent paragraph regarding “the areas classified as remaining sites.”
- c. Page 4-211. Right column first paragraph, references “Figure 8, 1997 Baseline Built and Munitions Conditions” as showing “areas with clean-up requirements.” In Figure 8, the grey shaded area is identified as “Munitions Areas.” It appears that the grey shaded areas show munitions response sites (MRSs) and Installation Restoration Program (IRP) sites. As the IRP sites were identified and have been investigated for soil and groundwater contamination issues (not for munitions response), the legend is confusing. Please consider identifying these two types of sites separately.
- d. Page 4-212, left column, first full paragraph. The Army did not conduct a prescribed burn in 2005 in support of munitions response in the impact area. Delete “2005.”
- e. On page 4-212, left column, second full paragraph, the “remaining sites” are described as “not expected to contain significant levels of munitions or contaminants.” The paragraph should identify the Army’s current munitions investigation efforts (outside the Impact Area) to address areas included in the Remaining RI/FS Areas Management Plan (OE-0687E). Some of the areas are still undergoing evaluation under the RI/FS process, so the Army has made no such determination about “levels of munitions” concerning the entire “remaining” areas, therefore the phrase should be deleted. In addition, “significant levels of munitions” is not defined, so the phrase should not be used.
- f. On page 4-212, right column. The last paragraph on the ESCA areas. First sentence “Regulatory closure has been completed for all but a small portion of the County North munitions response area and much of the Parker Flats munitions response area” is confusing. FORA’s request for Certification of Completion of the Remedial Action for the County North Munitions Response Area and the EPA’s concurrence excluded no part of the County North MRA from the certification. Recommend revising/rephrasing the sentence to reduce the chance of confusion.
- g. Page 4-212, Contamination Cleanup, Figure 11. Please replace with the map attached for Figure 11 which provides a current status of the groundwater cleanup.

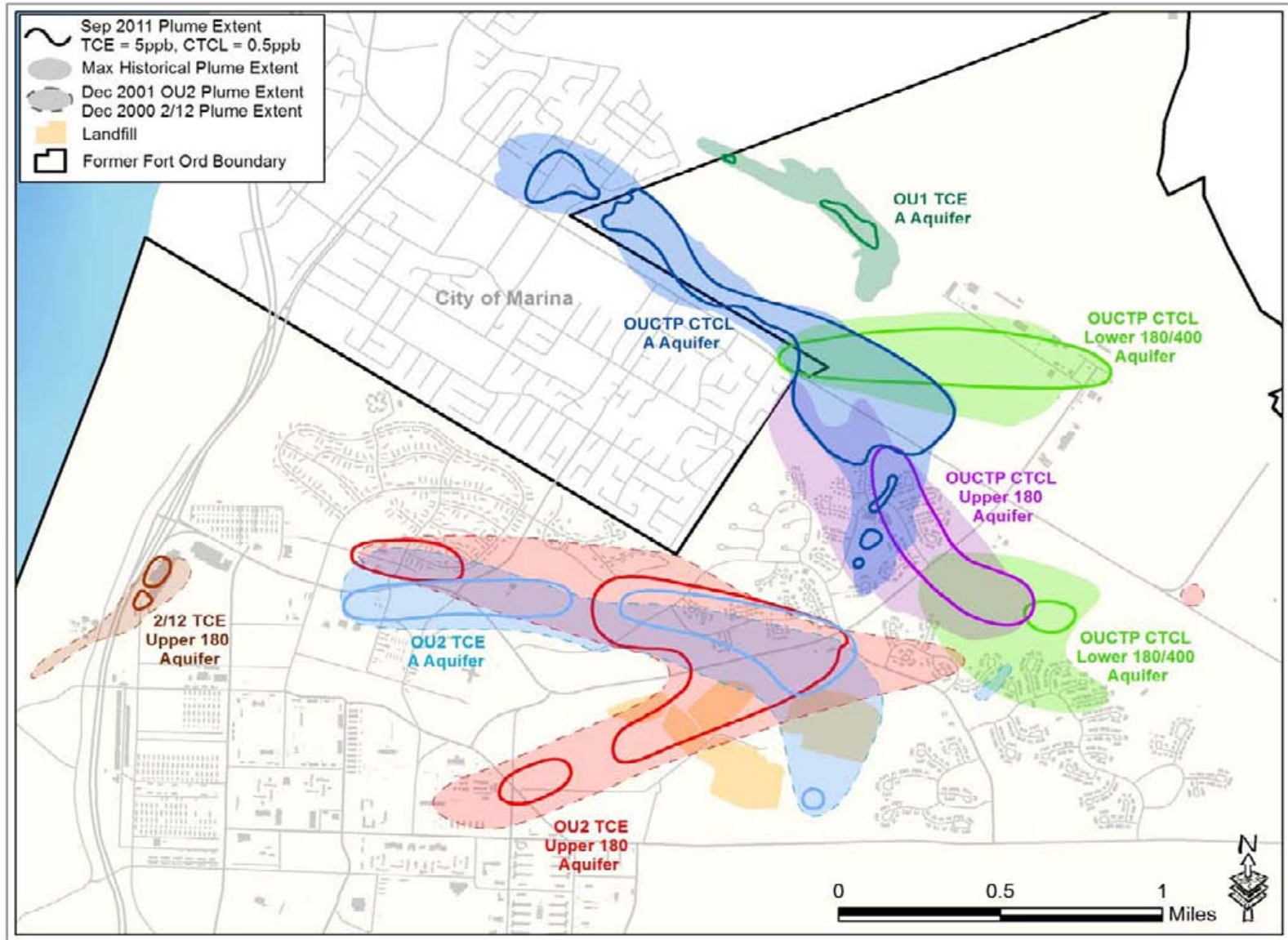
7. Contamination Cleanup, pages 4-221 – 222.

- a. Beach Firing ranges. The current language needs revision because the remediation resulted in large quantities of expended bullets and contaminated soil being excavated and placed on the former Fort Ord Landfill in accordance with the Site 3 Record of Decision and the Operable Unit 2 Record of Decision. Please revise the paragraph with the following text: “During the time Fort Ord was an active training facility, soldiers were trained in the use of small-caliber weapons at firing ranges in the sand dunes west of Highway 1. This area was cleaned up to standards approved by three state and federal environmental regulatory agencies, and transferred to the California Department of Parks and Recreation. Expended bullets remain on the property because the cleanup objective was to remove the contaminated soil where fine particles of lead fragmented off the

bullets after impacting the targets and backstops resulting in lead contaminated soil. The remedial action objective was to remove the contaminated soil to a level that protects human health and the environment for the future intended use as a state park. The property will remain as open space, used for hiking, camping, and recreational uses on designated trails and boardwalks to protect the rare, threatened, and endangered plants and animals.”

- b. Fritzsche Army Airfield, second bullet. Correct typo in the second sentence “arid” to “and.” Also, replace “traemns-1, 2” with “trans 1,2.”
- c. Fort Ord Landfills (Operable Unit 2), third bullet, first paragraph. Please revise with the following changes: “landfills” is one word and replace “closure” with “capping.”
- d. Fort Ord Landfills (Operable Unit 2), third bullet, second and third paragraphs. Revise the first sentence to state that “Groundwater contamination occurred as a result of water and chemicals migrating through the soil into the A, 180-foot and 400-foot aquifers.” The landfill engineered cover included the use of a “linear low density polyethylene” material to preclude water infiltration through the waste preventing further groundwater contamination. The cap is not a seal. A new groundwater treatment plant is being built at the landfill site to replace the current one. The landfill gas extraction system will not be operational until 2025 as stated. The date will be determined based on the gas generation. There is also perimeter landfill gas monitoring as required by state regulations to ensure that gases do not exceed 5% concentrations at the landfill perimeter.
- e. Carbon Tetrachloride plume (Operable Unit Carbon Tetrachloride Plume (OUCTP)). The plume source has been remediated and does not exist as suggested in the text. The Monterey County Special Groundwater Protection zone (MOCO Ordinance 15.08.140) includes not only this site but all sites where groundwater contamination exists. The bioremediation cleanup processes being utilized at this site is not experimental but is a well-established method of treating contaminated groundwater. The unique application completed at Fort Ord was to create large treatment areas using extraction and injection wells optimally placed to create the treatment zone. The treatment zone has lactate mixed with groundwater which works as explained in the document. Also, the last paragraph needs to be revised. Please delete the statement, “If successful, this method would replace the use of granular activated carbon for removal (Fort Ord BRAC Environmental Cleanup Annual Report 2011).” The annual report does not state that bioremediation will replace use of granular activated carbon.
- f. Localized Contamination Sites. Delete the last sentence and replace with, “The Army has completed the cleanup of localized soil contamination sites as described in the Basewide Record of Decision and the Interim Action Record of Decision.”

Groundwater Cleanup



From: Lisa Brinton [LBrinton@ci.seaside.ca.us]
Sent: Friday, August 31, 2012 3:09 PM
To: Darren McBain
Subject: City of Seaside draft Scoping Report Comments

Hi Darren,

Attached please find the City of Seaside Base Reassessment draft Scoping Report comments. The original was placed in the mail this afternoon.

Regards,

Lisa

Lisa Brinton
Redevelopment Project Manager
City of Seaside
440 Harcourt Avenue
Seaside, CA 93955
831-899-6883 (T)
831-899-6211 (F)
lbrinton@ci.seaside.ca.us

New City Hall Hours: Monday - Thursday, 7:30 a.m. - 5:30 p.m.

"Please consider the environment before printing this email and remember to print double-sided whenever possible."



CITY OF SEASIDE - CITY MANAGER'S OFFICE

440 Harcourt Avenue
Seaside, CA 93955

Telephone (831) 899-6701
FAX (831) 899-6227

August 31, 2012

Fort Ord Reuse Authority Board
920 2nd Avenue, Suite A
Marina CA 93933

SUBJECT: FORA Base Reuse Assessment Scoping Report Comments

Dear FORA Chair and Board Members,

The City of Seaside is in full support of the BRP's vision to promote the environmental, educational and economic goals. These three elements are paramount to the success of the reuse of the former Army base. While there has been substantive progress towards achieving the Plan's environmental and educational goals, the envisioned economic opportunities largely have yet to take place. We are very concerned that the third element, economics, may not reach its full potential, and this would have a particularly damaging effects on the city of Seaside. The re-assessment of the Base Reuse Plan (BRP) is crucial to ensure that the economic opportunities for our citizens be protected and accomplished. The comments below specifically highlight Seaside's needs to ensure we provide economic opportunity and stability to our community.

Job Creation. The City of Seaside supports the Scoping Report's recommendations that

- efforts must be made to institute a coordinated economic strategy, to substantially reduce development risk and to ensure that a variety of development opportunities are in place
- focus should be on export-oriented industry development comporting with the education and environmental sustainability goals on which base reuse is founded
- some residential growth may need to occur ahead of commercial growth to obtain jobs/housing balance over the longer term
- a more skilled labor force must be in place to attract employers to the region

The Re-assessment Report should include more specific recommendations and strategies for public/private collaboration to increase the skill level of the local labor force and to provide local employment opportunities for the existing higher skilled labor pool. With today's economic downturn and the dissolution of redevelopment, it is even more imperative that the economic assets are protected and development accomplished through careful planning. These economic opportunities are to provide the city the ability to create well-paying jobs for our residents and to bring in municipal revenues to provide much needed city services for the community.

The Base Reuse Plan should reflect and be consistent with the city's General Plan. The City of Seaside disagrees with the Scoping Reports statement on page 4-207 that the BRP is not required to be consistent with local general plans, but rather general plans are required to be consistent with the BRP. The General Plan is the primary document the City uses to regulate

SUBJECT: FORA Base Reuse Assessment Scoping Comments

land use. Therefore, the reassessment of the BRP should attest and confirm that the City of Seaside retains its right to develop consistent with its adopted General Plan as it may be modified from time to time.

Location and prioritization of development should be reaffirmed and re-prioritized through the reassessment process. The Scoping Report recommends that development be focused in blighted areas (page 3-13 # 7), and that additional office/R&D job growth be targeted in areas around Hwy 1 and in more urbanized development patterns (page 3-12 #1). The Scoping Report specifically identifies areas in the City of Marina for such type of development. Options to Policy Response #1 and #4 should reference, and the Reassessment Report recommendations should include the City of Seaside 2010 Seaside East Conceptual Master Plan's emphasis on shifting current residential land use designations to employment generating commercial/light industrial/R&R land uses along General Jim Boulevard south of Coe Avenue in addition. In addition the Scoping Report did not identify the area in the City of Seaside known as "Surplus II" which is adjacent to California State University Monterey Bay (CSUMB) for potential Office/R&D development.

FORA obligations for removal of barracks and hammerheads should be accomplished. This task should be one of FORA's highest priorities. While the Scoping Report recommends that FORA is to examine funding sources other than land sales for building removal, no specific alternative funding sources are identified. Given the safety issue, visual blight and increased developer risk related to these abandoned buildings, it is critical that the Reassessment Report include recommended funding sources and implementation strategies that will enable FORA to fulfill its obligation.

Adequate funding sources for Capital Improvement Projects (CIP) are necessary given loss of tax increment and these should be identified, evaluated and recommended. The Scoping Report states on page 3-2 that investment in major infrastructure is key to reducing perceived development risks. The formation of Infrastructure Financing Districts and ensuring FORA maintain its portion of redevelopment tax increment through legislative amendments are identified as potential sources of funds. Given the uncertainty of the legislative amendment process, there is a question as to the viability of these proposed funding sources. The Reassessment Report should include additional alternative funding source recommendations and implementation strategies that will enable FORA to fulfill its CIP obligations.

Distribute revenue and sharing of expenses among members in the most fair way. The Scoping Report states that infrastructure improvements must focus on regional needs and must contribute to fulfilling objectives ensuring that all jurisdictions share in economic recovery opportunities. It is important that the Reassessment Report provide more specific recommendations as to how the distribution of revenue and sharing of expenses among members can be implemented in the most fair way.

SUBJECT: FORA Base Reuse Assessment Scoping Comments

Distribute property tax received by FORA. Reference is made on in the Scoping Report on page 3-10 to the possibility that FORA may retain its share of tax increment remains intact, but there is no discussion or recommendation as to how these funds should be used. With the loss of Redevelopment Funds, this revenue should be allocated to the land-use jurisdictions to assist them in the economic development of properties.

Revisit voting procedures. The Scoping Report does acknowledge concerns raised regarding size of the Board and its decision making process, but does not provide a specific recommendation (page 3-10). More specific recommendations should be included in the Reassessment Report. The City of Seaside proposes the elimination of the requirement for a unanimous vote therefore eliminating the requirement for the second vote. This will provide an efficient and timely manner of doing business which also decreases staff time in preparing the agenda packets. Our desire is that valuable staff time be use to further the objectives of the BRP, rather than on a cumbersome process for Board decision making.

Sufficient water allocations needed to implement the BRP and enable future development to occur should be identified and limitations on water usage should be lifted. While the Scoping Report discussed the status of water allocation and proposed augmentation projects, no specific recommendations regarding lifting limitations to allow development to occur are provided. Future implementation of the BRP cannot occur without adequate water resources. The projection of water allocation needed to implement the BRP and water strategies for the provision of adequate water for development to occur must be addressed in the Reassessment Report.

Location of Central Coast Veteran's Cemetery. The Scoping Report briefly discusses the location of the proposed Veteran's Cemetery. The City of Seaside, the County of Monterey and FORA have entered into a Memorandum of Understanding for the development and endowment funding of the Veteran's Cemetery at its currently proposed location. The Re-assessment Report should include the recommendation that the BRP land use maps reflect the Central Coast Veteran Cemetery Parcel in currently proposed location.

The Scoping Report did not address the following concerns raised by the City of Seaside in its Scoping Comment letter dated August 2, 2012. These issues should be fully discussed the Reassessment Report.

Consider issues regarding maintenance of storm water basins built by FORA. Currently the transfer of BDA improvements to the City of Seaside requires maintenance of the basins until such time as all storm waters are retained onsite. However, the basins are owned by other entities and the stormwater comes from all lands in the former Ft. Ord. A funding source for the continued maintenance and/or contributions from all entities where storm water originates should be identified.

SUBJECT: FORA Base Reuse Assessment Scoping Comments

Consider proper reimbursement of caretaker costs. With the loss of Redevelopment Funds, caretaker costs should be the responsibility of FORA until such time that the property is sold or developed.

Consider issues regarding maintenance of public rights of way owned by the Army. Currently the transfer of EDA improvements to the cities requires maintenance of the facilities although some of those rights of ways are still owned by the Army. This requirement should be removed or the cities be compensated for the work done

Other Errata Items for Correction/Clarification

Consistency of Charts. The listing of percentages of acreage of former Fort Ord lands by jurisdiction in Table 2 on page 1-11 do not match those given on Figure 2 on page 1-9.

2008 Land Swap. Property transferred from the California Parks and Recreation Department to the City of Seaside for the American Youth Hostel as part of the 2008 Land Swap is not shown on Figure 21. The property is located in the area commonly known as “Surplus II” between Gigling and Col Durham Roads. Additionally, the Implementation Table on page 4-7 incorrectly states that the City/Army agreement was approved by the City RDA. The former Redevelopment Agency of the City of Seaside was not party to the agreement with the Army.

Consistency Determinations. The FORA Board deemed the Projects at Main Gate Specific Plan to be consistent with the BRP in 2010. This action was not documented under 4.3 Review of Completed Consistency Determinations and needs to be included in the final Scoping Report.

Chapter 5 Documentation: There is no reference made to the 2007 Former Fort Ord Properties Market Study or 2010 Seaside East Conceptual Master Plan in this section. These documents should be reviewed and included as referenced studies/plans as part of the re-assessment process.

Market Study: page A-3 The Monterey Downs and Horse Park Project is identified as being located in the County with a portion of the project to be annexed to the City. This statement is not completely correct. Currently a portion of the potential development (approximately 75 acres) is located within the city limits and under the jurisdiction of the City of Seaside, and a portion of the potential development (approximately 475 acres) is located within unincorporated Monterey County and under the jurisdiction of the County. The City of Seaside has received the applications from the Applicant for consideration of a Specific Plan and annexation of the entire proposed project into the City of Seaside. The County of Monterey has received no development applications for the proposed project.

Market Study: page A-5. There is incorrect reference to Seaside’s central business district as an industrial center. Seaside’s central business district is a retail commercial corridor.

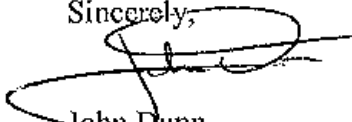
FORA Board
August 31, 2012
Page 5

SUBJECT: FORA Base Reuse Assessment Scoping Comments

The ultimate purpose of the Base Reuse Plan is to utilize the land and resources of the former Fort Ord lands to further the educational, environmental and economics objectives agreed upon through the public participation process initiated at the time of the Base closure. We are proud of the progress made on the educational and environmental fronts, and will continue to support further refinements and implementation of these portions of the Plan. However, we continue to have grave concerns that the economic goals set forth have only been fractionally achieved. In the case of the City of Seaside, our citizens need jobs, and living wages. The City itself needs revenues in order to present the types and quality of City services our citizens need and deserve. The loss of Redevelopment has exacted a severe reality on the City, in terms of our capacity to pursue economic opportunities. We need the help of FORA and its implementation of the BRP to give the economic portion of the Plan the same commitment, ardor and enthusiasm the other major elements of the Plan have previously received.

We appreciate the opportunity to provide you with our comments and concerns and thank you for your consideration.

Sincerely,



John Dunn
Interim City Manager

CC: Seaside Council Members

Vickie Bermea

From: Michael Houlemard [Michael@fora.org]
Sent: Saturday, September 01, 2012 9:33 AM
To: Tom Moore
Cc: Haines Jane; Steve Endsley; Darren McBain; Jen Simon
Subject: Fwd: Letter from Sierra Club Subcommittee

Tom,

It appears that your message did get through, even though our filter sent you a "rejection". That is a different problem, but we will check to correct both issues.

Michael

Sent from my iPhone

Begin forwarded message:

From: Tom Moore <tpmoore@redshift.com>
Date: August 31, 2012 2:43:46 PM PDT
To: Bill Kampe <bill@billkampe.org>, Dave Potter <district5@co.monterey.ca.us>, David Brown <davidwaynebrown@aol.com>, David Pendergrass <sandcitymyr@aol.com>, Dennis Donohue <dennisd@ci.salinas.ca.us>, Felix Bachofner <felix@felixforseaside.com>, Ian Oglesby <district4@co.monterey.ca.us>, Jane Parker <Jason@burnettforCarmel.com>, Jason Burnette <cityhall@delreyoaks.org>, Jerry Edelen <district2@co.monterey.ca.us>, Frank O'Connell <frank@oconnell4us.com>, Lou Calcagno <district2@co.monterey.ca.us>, Nancy Selfridge <selfridg@ci.monterey.ca.us>
Cc: Michael Houlemard <michael@fora.org>
Subject: Letter from Sierra Club Subcommittee

Dear Members of the Board of Directors, Fort Ord Reuse Authority;

You will find attached a letter from the Fort Ord Subcommittee of the Ventana Chapter of the Sierra Club regarding the draft scoping report that has been provided to you by EMC. We would very much appreciate it if you might find the time to read the first eight pages of the attached document.

We find that EMC's draft scoping report contains a tremendous amount of information that is vitally important to your decision making going forward. There are just a few areas of the report that should be improved. And regardless of whether or not you agree with our analysis of the draft scoping report, we particularly urge you to carefully read the 16 pages of Chapter 3 of the report and to scan the stoplight charts in Chapter 4 (particularly those that might apply to your jurisdiction).

Sincerely yours,
Tom

Thomas P. Moore, Ph.D., C.P.L.
Chair, Fort Ord Subcommittee
Ventana Chapter, Sierra Club



SIERRA CLUB VENTANA CHAPTER

P.O. BOX 5667, CARMEL, CALIFORNIA 93921

CHAPTER OFFICE • ENVIRONMENTAL CENTER (831) 624-8032

August 31, 2012

Board of Directors
Fort Ord Reuse Authority
920 2nd Avenue, Suite A
Marina, CA 93933

Re: Sierra Club's comments on the reassessment documents

Dear FORA Board of Directors:

The Sierra Club has reviewed the 340-page Draft Scoping Report and its 6,378-page addenda (collectively "the reassessment documents.") Our seven comments are listed below, and our fifteen-page analysis with attachments is attached.

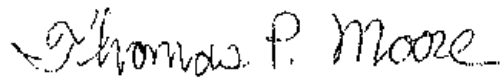
1. **Build on Blight First:** A majority of the 317 written comments submitted during the reassessment process responded that development on open space should not occur until the blight is removed and the urban footprint is built out. The FORA Board should amend the Base Reuse Plan (BRP) accordingly.
2. **Reexamine Financing of Blight Removal:** The reassessment documents suggest that FORA reexamine ways to finance blight removal. FORA should hold a study session with Economic & Planning Systems (EPS) to learn more about financing blight removal.
3. **Develop a Vigorous Marketing Plan:** The reassessment documents agree with the recommendations of the Sierra Club and the BRP that FORA should develop a vigorous marketing plan that will draw tourists to Fort Ord, including tourists to the National Monument. FORA should implement the recommended marketing plan.
4. **Rectify the Jobs/Housing Analysis:** The reassessment documents respond to Sierra Club's request for analysis of the BRP's jobs/housing ratio, but the analysis fails to address the main issues that Sierra Club specified. The Final Scoping Report should address the additional issues.
5. **Monitor Implementation Status Consistently:** The reassessment documents show that many BRP policies have not been implemented. FORA should correct these shortcomings and improve its monitoring of the implementation status of adopted policies.
6. **Address CSU Monterey Bay's Concerns:** The reassessment documents fail to address CSUMB's recommendation for analysis of compatibility of nearby land uses, and how

incompatibility of land uses could interfere with CSUMB's mission. Sierra Club agrees with CSUMB's recommendation and requests that the Final Scoping Report address the issue of incompatible land uses, particularly with respect to areas near CSUMB.

- 7. Respond in Final Report:** Sierra Club finds some passages in the Draft Scoping Report difficult to decipher plus we have questions about interpretation. We submit these questions and concerns so that they may be addressed in the Final Scoping Report.

Thank you for this opportunity to participate in reassessment of the Base Reuse Plan.

Sincerely yours,

A handwritten signature in black ink that reads "Thomas P. Moore". The signature is written in a cursive style with a large initial 'T' and a long horizontal stroke at the end.

Thomas P. Moore, Ph.D., Chair
Sierra Club FORA Subcommittee

cc: Michael Houlemard

SIERRA CLUB'S ANALYSIS OF THE REASSESSMENT DOCUMENTS

- 1. A majority of the 317 written comments submitted during the reassessment process responded that development on open space should not occur until the blight is removed and the urban footprint is built out. FORA should amend the Base Reuse Plan (BRP) accordingly.**

The reassessment documents at Appendices D-2, D-3 and D-4 show that the most frequent recommendation in the 317 written comments¹ received so far during the reassessment process is that FORA should ensure that blighted lands within the urban footprint are developed before development is allowed on open space land. Out of 317 written responses, 56 percent (179) recommend that FORA prohibit development on open land until the urban footprint is built out. A representative sample of the written comments addressing the blight issue is attachment #1 to this letter. Included are some letters by persons who also recommend that the veterans' cemetery be moved to the BLM land.

In addition to the 179 written comments opposing further development on open land until the blighted areas are built out, oral comments by the several hundred participants in one or more of the five reassessment workshops were recorded and analyzed for 22 workshop discussion groups. Twenty of the 22 workshop discussion groups contained one or more persons making oral comments addressing the blight issue.²

The public's response to the BRP reassessment undeniably shows that the reassessment must address the majority public opinion that the BRP must be amended to allow no more development entitlements outside of the urban footprint until the blighted areas are built out. FORA should amend the BRP accordingly.

- 2. The reassessment documents suggest that FORA reexamine ways to finance blight removal. The FORA Board should hold a study session with Economic & Planning Systems (EPS) to learn more about financing blight removal.**

Sierra Club representatives have heard FORA staff say many times that without the revenue from land sales, building removal cannot occur. This belief is used by FORA to justify extending the development footprint beyond the Army Urbanized Footprint boundaries shown in grey in the map attached to this letter as Attachment #2, into the larger development footprint including the area shown in red.³ Developers of lands within the Army Urbanized Footprint bear the direct expense of blight removal, whereas developers of lands in open space bear the indirect expense

¹ One hundred and sixty-six comments were received by email (Appendix D-2), 103 by letters (Appendix D-3), and 48 on the FORA-provided comment form (Appendix D-4), for a total of 317 written responses.

² Appendix D-5.

³ Attachment #2 is a copy of Figure 13 in the Scoping Report from Chapter 4 at page 4-237.

NOTE: *In searching for pages in the Scoping Report on the CD, inserting page numbers in the search bar frequently takes you to only the approximately correct page. For example, in searching for page 4-237 in Chapter 4 of the Scoping Report, entering 243 in the search bar takes you to page 237, whereas entering 237 would take you to page 231. Thus, for persons searching on the CD, it is important to check the actual page numbers shown at the bottom of each page. Of course, this would not be necessary for persons using a hard copy of the Scoping Report. Also, note that the CD refers to "sec." rather than to "chapter."*

of blight removal in that they pay into a land sale fund dedicated for blight removal. The Scoping Report recommends reexamination of FORA's reliance on land sale revenues to fund building removal.

Historically, the intent of the reuse process was for the Army Urban Footprint to be redeveloped first. The Scoping Report on page 4-236 states: "[the] Base Reuse Plan and Chapter 8 of the Master Resolution refer to the 'Army Urbanized Footprint' and policies direct prioritization of that area for development." That prioritization has been weakened by FORA's policy of generating revenue from land sales to finance blight removal.

The Scoping Report recommends reexamination of land sales as a way to fund building removal:

To the degree possible given market and economic conditions, near term redevelopment efforts should be focused on paved and built areas to remove visual blight and improve the ability of the former Fort Ord to attract new employment generating uses. Focusing near-term redevelopment efforts on blighted (paved) areas will create a more attractive urban form with the potential to catalyze future growth opportunities.

Related to this concept, reliance on land sales to fund building removal should be reexamined. In the near term, residual land values are expected to be low to nonexistent, limiting the funds that may be available from this source. The availability of property tax funding remains unresolved, which further limits the ability to incent development. *FORA should examine other means by which building removal can take place* (emphasis added). An increased pace of building removal will not only assuage visual blight issues, but will improve safety and make the area more attractive to investors.⁴

See also paragraph 19 on page 3-6: "The ability to realize strong growth heavily depends on the perception of the base as a coherent, well-planned area with a dynamic future...Removal of derelict Army buildings needs to be prioritized to provide a better vision of future economic opportunity." See also Appendix E, pg. 21, paragraph 7.

EPS, which wrote the Market Study, is still under contract with FORA. Sierra Club suggests that the FORA Board hold a study session with EPS for advice about reexamining FORA's reliance on land sales to fund building removal, and the economic consequences of a policy prohibiting further development on open space until the urban footprint is built out.

The public is demanding a new direction and there is no better time than this fall for the FORA Board to reexamine the relationship between its currently expanded development footprint and blight removal.

3. The reassessment documents agree with the recommendations of the Sierra Club and the BRP that FORA should develop a vigorous marketing plan. Such a plan will help draw

⁴ Scoping Report in Chapter 3, page 3-13, paragraph 7.

tourists to the National Monument. FORA should develop and implement the recommended marketing plan.

Sierra Club's June 1 comment on the reassessment laments that FORA has never developed a marketing plan, despite the fact that Volume 3 of the BRP states that FORA "should create a comprehensive marketing strategy and plan for all Fort Ord sites and the surrounding environs..." Sierra Club has recommended that a non-profit corporation for marketing be formed. A similar non-profit corporation is described in Volume 3, page III-5 of the BRP. As part of the marketing plan, attention must be paid to how the new National Monument could increase regional revenue from tourism. Sierra Club's June 1 letter is attached to this analysis as Attachment #3.

The Market Study agrees with Sierra Club's recommendation. It states:

Engage in comprehensive marketing and branding effort. Whether led by the public or private sector, the appearance and perception of the base needs to be improved to support development and leverage the National Monument designation of the former base.⁵

Additionally, page 7 of the Market Study, paragraph 7, calls for Fort Ord to recommit to marketing and branding. On pages 13 and 14, it describes the benefits that could come from marketing the National Monument.

If FORA is to follow the advice of the Market Study, it needs to develop a marketing plan that capitalizes on assets of the surrounding environs, including the National Monument.

4. The reassessment documents respond to Sierra Club's request for analysis of the BRP's jobs/housing ratio, but the analysis fails to address the main issues that Sierra Club specified. The Final Scoping Report should address the additional issues.

Sierra Club's June 1 comment requested a more rigorously analyzed and implemented jobs/housing ratio. The Market Study responded on page 25 of Appendix E by recommending using a slightly larger geography than solely limiting the geography to Fort Ord, suggesting for example the Monterey Peninsula or Monterey County as a whole. However, Sierra Club's main concern was with the lack of rigor in FORA's jobs/housing ratio, and that issue was not addressed. In particular, the market study should examine ways to take income distribution and housing price distribution into account in examining the concept of jobs/housing ratio. The Final Scoping Report should address the issues specified in Sierra Club's June 1 comments.

5. The reassessment documents show that many BRP policies have not been implemented. FORA should correct these shortcomings and improve its monitoring of the implementation status of adopted policies.

Sierra Club's enthusiasm for the BRP is based in part on its vision of clusters of pedestrian-centered villages surrounding CSUMB, linked by hiking and bicycling trails which lead through

⁵ Appendix E, pg. 13, paragraph 2.

areas of protected habitat. One of the policies essential to this vision is the Regional Urban Design policy, which is one of the BRP's six design principles intended to guide the plan. Sierra Club's June 1 comments complained of FORA's failure to implement BRP policies such as the Regional Urban Design policy, and requested consistent monitoring of the enforcement of the BRP's policies, noting that the BRP has 6 design principles, 8 goals, 70 objectives, 363 policies and 582 programs.

Table 8 of Chapter 4 of the Scoping Report, beginning on page 4-3 and continuing for 160 pages to page 4-163, responds with a thorough analysis of the implementation status of the BRP's objectives, policies, programs, and mitigation measures. Table 8 shows that there are 156 unmet (incomplete) objectives, policies, programs, and mitigation measures in the BRP, including the Regional Urban Design Guidelines.⁶ The 156 shortcomings result from both the jurisdictions' failures to meet their obligations as well as from FORA's failures.

Table 8 explains what needs to be done before such objectives, policies, programs and mitigation measures can be considered complete. The FORA board should prevent this from ever happening again by scheduling a study session to review the shortcomings and decide on a process to get them corrected, and by directing FORA staff to engage in robust and continuing evaluation of the status of the implementation of the plan, and with continuing and periodic reports to the FORA board about results of these evaluations.

6. The reassessment documents fail to address CSUMB's recommendation for analysis of compatibility of nearby land uses, and how incompatibility of land uses could interfere with CSUMB's mission. Sierra Club agrees with CSUMB's recommendation and requests that the Final Scoping Report address the issue of incompatible land uses, particularly with respect to areas near CSUMB.

The BRP intended CSUMB to be the centerpiece of Fort Ord.⁷ Despite that, CSUMB is not a voting member of the FORA board and it appears that the reassessment documents have ignored CSUMB's request for analysis of compatibility as part of the consistency finding process. Sierra Club agrees with CSUMB's request stated on page 60 of Appendix D-3 which asks that the reassessment reinforce how CSUMB "is the core of the redevelopment of Fort Ord and reiterate how projects should align and support the function of the University and its further growth."⁸ It refers to "a handful of projects proposed next to CSUMB that the University has struggled to understand how they meet various reuse policies, objectives, plans and promote land use consistency with the campus."⁹ CSUMB recommends that "...the assessment and analysis of

⁶ The Regional Urban Design Guidelines is a primary requirement of the BRP. Its importance is described in BRP Vol. I, page 61. Sierra Club's June 1 comments cite to ten additional BRP pages where the Regional Urban Design Guidelines are required. The Scoping Report states in Chapter 4, page 4-19, that it has not been implemented. Sierra Club believes it should be a basic objective of the Reassessment process to get the Regional Urban Design Guidelines developed and implemented, and that the FORA Board should formulate a policy to ensure that in the future, the status of all goals, objectives, policies and programs are regularly monitored and the status of that monitoring is presented to the Board at regular intervals. See Sierra Club's June 1 comments at Attachment #3 to this analysis, pages 3 and 4, for further discussion of non-implemented policies.

⁷ See comments by CSUMB at Appendix D-3, pages 58-65.

⁸ Ibid.

⁹ Ibid.

compatibility of projects adjacent to the campus should address how such projects align with the goals and objectives of CSUMB and its Master Plan.”¹⁰

Sierra Club searched the Scoping Report and the EPS Market Study for analysis of compatibility of adjacent land uses requested by CSUMB, but we find little that is directly responsive to CSUMB’s plea for analysis of “projects [that] align and support the function of the University and its further growth.”¹¹ Sierra Club believes that such an analysis is needed, and we recommend additional evaluation in the Final Scoping Report of specific criteria to be used for determining the consistency of proposed projects with already-existing nearby projects, particularly as to how nearby projects align with the goals and objectives of CSUMB and its Master Plan. After all, CSUMB is described in the Market Report as “generally viewed as the most successful civilian development at Fort Ord.”¹²

7. Sierra Club finds some passages in the Draft Scoping Report difficult to decipher plus we have questions about interpretation. We submit these questions so that they may be addressed in the Final Scoping Report.

- (1) It appears from explanations in the Scoping Report that when a project receives a consistency determination approval, the BRP gets amended to conform to project characteristics that otherwise would be inconsistent with the BRP. Is this really the way it works? If so, Sierra Club has serious concerns about such a practice.
- (2) With reference to the question above, it appears that this practice results in the BRP posted on FORA’s website, which the Scoping Report in Chapter 4 on page 1-6 indicates is the digital version of the September 2001 BRP, as not in fact being the BRP as it has been subsequently amended, as explained on page 4-176. Is it true that the website BRP is not the actual BRP, and if so is there any way for the public to know what is in the actual amended BRP other than by sorting through scores of staff reports to figure out how the BRP was amended? In other words, is there an actual BRP that the public has never seen and has no reasonable way of knowing what it actually says?
- (3) The Scoping Report, Chapter 4, page 4-176, notes that “FORA staff has established procedures for conducting consistency determinations that augment the provisions of FORA Master Resolution Chapter 8.” This part of Chapter 4 compares the BRP to a general plan and quotes the California Office of Planning and Research’s (OPR) General Plan Guidelines definition for consistency, meaning that as long as the action, program, or project furthers the objectives and policies of the general plan, it can be deemed consistent. However, that is not what Chapter 8 says. The major benefit of the consistency determination standards in Chapter 8, Section 8.02.030 for the Sierra Club is that they establish mandatory criteria. In other words, they say that “the Authority Board *shall* disapprove any legislative land use decision for which there is substantial evidence supported by the record, that ...” (emphasis added) the project fails to meet any one or more of the eight criteria in this section of Chapter 8. These eight criteria are specified in subsection (a) for mandatory denial of approval. The

¹⁰ Ibid.

¹¹ CSUMB’s comments at Appendix D-3, pg. 60.

¹² Appendix E (Market Study) at pg. 21.

mandatory requirement resulting from use of the word “shall” differs greatly from OPR’s much more lenient consistency determination criteria, which is a basic reason for Sierra Club’s settlement agreement. Does FORA take into consideration the stark difference between what Chapter 8 says about consistency determinations pertaining to consistency with the BPR as compared to what OPR says about consistency determinations pertaining to a general plan?

- (4) Chart 7 in Chapter 3 on page 3-4 of the Scoping Report has footnotes referring to Table 2-7. Please inform us where Table 2-7 can be found.
- (5) Chart 7 on page 3-4 has a column entitled “Projected Fort Ord Supply.” Please inform us the origin of the projection; is it a projection found in the BRP, and if so where in the BRP? Is the word “projected” used in the column title intended to refer to the residential units and square footage that have already been entitled, or does it refer to the numbers of units, footage and jobs that were planned-for at some time in the past? and if so, at what time in the past and by whom?
- (6) Page 2-9 of the Scoping Report states: “Project-specific public comments are best directed to the relevant local jurisdiction, as the FORA Board does not have discretionary authority to review or approve entitlements for such projects.” Does this mean that FORA believes its consistency determination review authority is merely ministerial rather than discretionary?
- (7) We approve of the BRP identifying areas by polygon numbers, such as is used in Figure 7.1 in the Scoping Report, because the reader can readily identify the area under discussion. However, we would find it helpful if a chart were added to the BRP showing the equivalent County Assessor Parcel Numbers (APN) and Department of Defense parcel numbers linked to the polygon numbers. That way, if a polygon consisted of several parcels with several owners, that fact could be easily discerned.

Attachment #1: Representative sample of portions of letters responding to the reassessment process.

Attachment #2: Map showing Army Urbanized Footprint and Base Reuse Plan Development Footprint Located Outside the Army Urbanized Footprint which is Figure 13 in Chapter 4 of the Scoping Report (page 4-237).

Attachment #3: Sierra Club’s June 1, 2012 recommendations for the reassessment, review and consideration of the Fort Ord Base Reuse Plan.

Representative Comments Regarding Blight/Urban Footprint

Pacific Grove, Henrietta Stern:

"Adopt the basic philosophy of first requiring redevelopment on the urban (blighted) footprint and minimizing development on open space and trail areas. This includes a commitment by FORA to provide leadership and vision to help member jurisdictions and developers work cooperative to achieve this goal for the benefit of all. I know funding and "turf protection" by jurisdictions are issues, but there is money out there and amazing accomplishments are possible when there is a clear vision and leadership toward it. Redevelopment of decrepit blight areas will provide much-needed jobs, and replace ugly, barren areas with beautiful new homes and businesses that will have higher property values, attract people and employers (jobs) willing to pay more for land near lovely trails and open space, and generate more tax revenue for cities/County. Developing the urban blight can be a win-win for developers, residents and government." (Page 239 of 298 in Appendix D-3.)

Carmel, The Quirits family:

"All development should replace the old dilapidated barracks of buildings already there on Fort Ord. Don't even think of destroying beautiful oak woodlands while messes are still standing." (Page 11 of 298 in Appendix D-3.)

Seaside, Roelof Wijlandus:

"We must build on the blighted parts of Ft. Ord first." (Page 6 of 48 in Appendix D-4.)

Marina, Monterey Off Road Cycling Association:

"We believe that developments, should they occur, should happen on the 'Army urbanized footprints' (the areas with abandoned buildings and parking lots) first." (Page 113 of 298 in Appendix D-3.)

Salinas, David Alexander:

"The Army gave a functioning base to the public that has since become acres and acres of "urban blight" in the Army Urbanized Footprint. The overwhelming consensus of the community is a resounding DEMAND for development on the urbanized footprint -- NOT ON OPEN SPACE." (Page 24 of 287 in Appendix D-2.)

Pebble Beach, Robert and Linda Gormley:

"Limit further expansion of commercial businesses and housing to areas already occupied by old buildings used by the Army." (Pg. 121 of 287 in Appendix D-2.)

Monterey, Barbara Baldock:

"Please consider development in the parts of Ft. Ord where there is already old buildings. Surely money can be found to clear these sites. ... Development should not be considered in the oak woodlands. These should be preserved for recreational use." (Pg. 76 of 287 in Appendix D-2.)

Pacific Grove, Vicki Pearse:

"Place development only on already-built and blighted sites (Army Urban Footprint) -- not on forested open space....Site [the proposed veterans' cemetery] in a place of honor and quiet, ideally where this veterans' resting place can become an integral part, appropriately, of the Fort Ord Soldiers National Monument." (Pgs. 124-125 in Appendix D-2.)

Prunedale, Joel Trice:

"Build on urbanized blight first....Locate and build veterans cemetery at a location which may be incorporated into the National Monument." (Pg. 61 of 287 in Appendix D-2.)

Carmel Valley, Marli Melton:

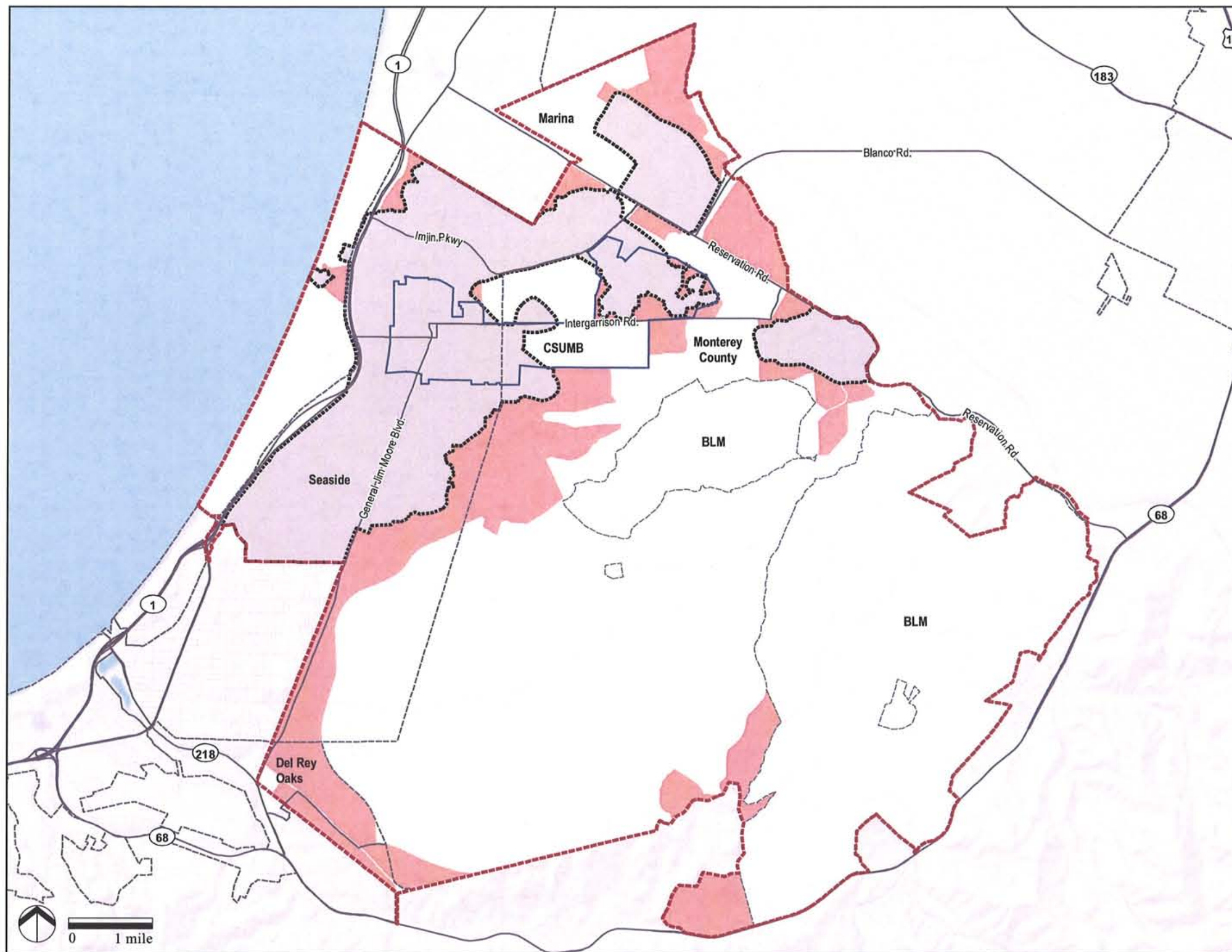
"Revise the Plan to make it an absolute priority to redevelop already developed areas, especially those that are blighted and need clean-up, BEFORE allowing development on existing open space." (Pg. 127 of 287 in Appendix D-2.)

Royal Oaks, Mark Kaplan:

"Build on urbanized blight first." (Pg. 68 of 287 in Appendix D-2.)

APO, AE 0902, Sandy McPherson:

"As parents of children who have a tremendous love for outdoor activities, especially equestrian related opportunities and having relocated numerous times throughout the country, we have seen firsthand how access to our beautiful lands continues to diminish. For myself and my husband, who ACTUALLY FIGHTS for these freedoms for the people on a day to day basis, this is truly saddening. Again, we appeal to you. REASSESS and MODIFY the Base Reuse Plan, consistent with the needs and interests of the region as they exist now. Build on urbanized blight first. Population growth since 1995 is substantially less than predicted, with significantly lower demand for expansion into undeveloped areas. Plan reassessment requires recognition of the changed demands and interests of those who live here." (Pg. 56 of 287 in Appendix D-2.)



Legend

- Fort Ord Boundary
- Army Urbanized Footprint (see note 1)
- Base Reuse Plan Development Footprint Located Outside the Army Urbanized Footprint (see note 2)

Map Description

This map illustrates locations of areas designated for development in the 1997 Base Reuse Plan relative to the Army Urbanized Footprint.

Notes

1. The "Army Urbanized Footprint" is derived from the Draft Land Use Baseline Study of Fort Ord, California, prepared by the U.S. Army Corps of Engineers, Sacramento District in March 1992. The majority of the urbanized footprint boundary is taken from Figure 3 – Fort Ord Existing Land Use Map. Adjustments to this line were made for the Frederick Park and Schoonover Park housing areas based on Figure 7 Fort Ord Locator Map; the revised line matches actual development in this area.
2. The Base Reuse Plan Development Footprint is derived from the 1997 Base Reuse Plan. This boundary is taken from Figure 3.3-1 Land Use Concept Ultimate Development. For the purposes of this map, the boundary is highlighting areas outside of the "Army Urbanized Footprint" that the 1997 Base Reuse Plan designates for development.

Source: Fort Ord Reuse Authority 2012, U.S. Army Corps of Engineers 2012, ESRI 2009

Figure 13
Fort Ord Reuse Plan Development Footprint





SIERRA CLUB VENTANA CHAPTER

P.O. BOX 5667, CARMEL, CALIFORNIA 93921

CHAPTER OFFICE • ENVIRONMENTAL CENTER (831) 624-8032

MEMORANDUM FOR: Fort Ord Reuse Authority
SUBJECT: Reassessment of the Base Reuse Plan
DATE: June 1, 2012

VIA: plan@fora.org

The Ventana Chapter of the Sierra Club, FORA subcommittee, submits the following five recommendations for the reassessment, review and consideration of the Fort Ord Base Reuse Plan (BRP):

1. Develop a vigorous marketing plan based on the recommendations in BRP Volume 3, pages III-3 to III-6;
2. To the extent possible given the entitlements that have been granted as of June 1, 2012 ensure that no new entitlements are granted outside the Army urbanized footprint until that footprint is built out.
3. Do a rigorous analysis and implementation of the jobs/housing ratio required by the BRP and Chapter 8;
4. Promptly implement several mandated policies in the BRP;
5. Develop a consistent monitoring and evaluation process for measuring FORA's progress toward meeting the long-term goals of the base reuse plan.

1. A Vigorous Marketing Plan

According to Volume 3 of the BRP, FORA, "...should create a comprehensive marketing strategy and plan for all Fort Ord sites and the surrounding environs, reflecting an overall vision and identity for the area."¹ It appears that this has never been done. Volume 3 of the BRP further states, "FORA should take a proactive approach to joint marketing with both CSUMB and UCMBEST."² We urge FORA to take both these actions and to also study the recommendation concerning the establishment of a nonprofit development corporation for marketing as described in Volume 3, page III-5 of the BRP.

At the very least, the non-profit development corporation should have the following goals:

¹ Base Reuse Plan, Volume 3, page III-4.

² Ibid

- To attract businesses that serve recreational tourists coming to the former Ft. Ord and the Monterey Peninsula;
- To attract recreational tourists to the Monterey Peninsula; and
- To provide supplemental funding for the environmental conservation and maintenance activities that will be required as a result of the influx of tourists that the marketing campaign will attract.

The marketing program's accomplishments and budget should be evaluated annually at the same time that the Capital Improvement Program (CIP) is evaluated.

With the right marketing program, the former Fort Ord could become the "Recreational Capital of California." In the sport of bicycling, for example, the Sea Otter Classic is already an established event. In 2012, this event hosted nearly 10,000 athletes and 50,000 race fans. However, the Sea Otter Classic should not be the primary emphasis of the marketing program, but rather one of a host of year-round recreational events, programs and opportunities for people of all ages. The marketing program should attract grandparents, parents and children for family bicycle outings, senior citizens to rent recumbent, tandem, surrey style, and electric bicycles to use on bicycle lanes throughout the National Monument, State Beach and University Campus. There should be off-road bicycles for riding on the designated mountain bike paths throughout the Fort Ord National Monument. The Bureau of Land Management should establish and enforce a mountain bike policy such as Sierra Club's mountain bike policy at <http://sierraclub.org/policy/conservation/mtnbike.aspx>. We believe that this vision of bicycle-oriented, pedestrian-centered communities with an interconnected network of bicycle trails adjoining a college town will attract business owners who want their employees to work in an area that fosters healthy families and has affordable housing.

The creation of the new Fort Ord National Monument under the Bureau of Land Management ought to be one of the centerpiece of the marketing plan. Additionally, the impending Habitat Conservation Plan should be amended to require supplemental funding for environmental conservation within the National Monument's borders, which will be necessitated by the additional tourists who will be attracted to the area by the marketing program.

The BRP makes frequent references to equestrian trails and horse parks, in addition to a bicycle network. We note that Fort Ord was one of the last active cavalry posts in the U.S. Army; and is well suited for equestrian uses. This fact should be stressed in the marketing, along with a mention of the museum or museums to be established at in the Fort Ord area.

2. No New Entitlements Outside of the Army Urbanized Footprint

We strongly urge the FORA board to adopt a policy that will postpone any developments outside of the Army Urbanized Footprint (except the Veteran's Cemetery) until the Footprint is built out or 20 years pass, whichever is sooner.

3. A Rigorously-analyzed and Implemented Jobs/Housing Ratio

The jobs/housing ratio described on page 92 of Volume 1 of the BRP establishes a ratio of 2.06 jobs/household including CSUMB dwelling units or 2.67 jobs/household excluding CSUMB. Volume 1, Page 120 of the BRP explains the rationale underlying this requirement and Section 8.02.020(t) of the Master Resolution requires each land use agency to include policies and programs in their general plan to ensure compliance with the 1997 adopted ratio. We strongly recommend that the reassessment include an analysis to determine if there is an appropriate balance between the number of jobs in various salary/wage ranges and the number of dwelling units in various housing affordability categories.

For example, Seaside Highlands contains 380 homes that sold in the near-million dollar range, whereas the Dunes Regional Shopping Center contains mostly retail jobs whose wages appear to be \$20 per hour or less. One of the reasons for putting the jobs/housing ratio requirement in the BRP was to reduce travel demands on key roadways by reducing the length of commutes to work and/or shifting vehicle trips to alternate transportation modes. The jobs/housing ratio analysis should be rigorous enough to ensure that the jobs to be created will match the cost of the housing to be built.

We note that the Main Gate (shopping center) Project will be a 100% non-residential project with projected employment of 775 to 830 new service and professional positions. This should help achieve the jobs/housing ratio base-wide. However, we are unable to find the breakdown of projected lower-paid service jobs in the Main Gate Project compared to projected higher-paid professional positions. It is this lack of rigorous jobs/housing analysis that we recommend be corrected.

Probably the greatest disappointment of base reuse process occurred when the University of California Monterey Bay Education, Education and Technology Center (MBEST) failed to attract the projected 925,000 square feet of office and R&D space from Silicon Valley firms described in BRP Volume 3, page II-10. Instead of the thousands of high-paying R&D/office/business and industrial park jobs projected in Volume I, page 45 of the BRP, MBEST in November 2011 acknowledged failure and greatly downsized its expectations (see the November 17, 2011 UC Monterey Bay Education, Science, and Technology Center Visioning Process prepared by Urban Design Associates). Perhaps a vigorous marketing plan created by FORA could have avoided this failure.

At this time when FORA is reassessing, reviewing, and considering the BRP, our subcommittee requests FORA to adopt and implement much more stringent standards for analysis and implementation of the jobs/housing ratio and to make the attraction of more plentiful and higher-paying jobs one of its most important priorities.

4. Failure to Implement Certain BRP Policies

For travelers on State Highway 1 who view the former Fort Ord from the highway, the ugliest view is the westward facing back side of the Dunes Regional Shopping Center

at the Imjin Parkway interchange. There are many attractive design features of the Dunes project, but the fenced-in area of loading docks and dumpster enclosures above which tasteless big box store signs accost the traveler's eyes is antithetical to the aesthetic values long associated with the Monterey area. It is a visual blight that will repel visitors who arrive in expectation of an environmentally-sensitive community.

The visual blight could be mitigated by implementation of the mandated policy found on page 71 of Volume 1 of the BRP. This policy calls for establishment of an open space corridor which is a minimum of 100 feet wide along the entire eastern edge of State Highway 1. The policy further calls for this corridor to be landscaped via a master landscape plan to reinforce the regional landscape setting along the northern entryway to the Monterey Peninsula area. Apparently, such a master landscape plan was either never developed or not enforced because the area we refer is nearly devoid of trees. A series of tall trees growing close together in the corridor area just south of the Imjin Parkway interchange would help mitigate the visual pollution.

Another important policy that needs to be implemented is the requirement for FORA to develop regional urban design guidelines. This policy is described and referenced in Volume 1 of the BRP on pages 235, 240, 247, 251, 260, 261, 275, 276, 277 and 279. Although Highway 1 Design Guidelines were developed in 2005, they only apply to the Highway 1 corridor, not the remainder of the areas of the base for which development is planned. Furthermore, the Highway 1 Design Guidelines failed to prevent the visually ugly area in the vicinity of the Imjin Parkway interchange. In their response to our public record request for the regional urban design guidelines, FORA staff acknowledged that such guidelines do not exist. They should be developed promptly and implemented in such a way as to provide visual continuity when traveling between areas as diverse as CSUMB, the Dunes project, Seaside Highlands, etc. Finally, the creation of the Fort Ord National Monument has also made the creation of the FORA urban design guidelines imperative.

Our subcommittee believes that the commercial success of areas like Carmel, Pacific Grove and Monterey, where tasteful signage guidelines are encouraged, will serve as evidence to FORA, Marina, Seaside, Del Rey Oaks, Monterey and the County that tasteful regional urban design guidelines and implementation of a master landscaping plan would be more effective ways of increasing business profits than allowing the types of strip mall signage that currently blights the Imjin Parkway entranceway. Well-executed marketing materials might showcase some of the good design that is already included in the specific plans for the Dunes, East Garrison, and Marina Heights projects. Our Sierra Club FORA subcommittee believes that the ultimate economic benefits that will result from integrating the entire base into one aesthetically pleasing continuum will foster long-term financial success.

5. Consistent Monitoring of the Performance and Effectiveness of the BRP

In 1996, the FORA board defined its missions in Volume 3 of the BRP. Among them was to, "Develop a process for monitoring conformance with the CIP and the Reuse

Plan (emphasis added) that maintains the integrity of the plan...³ The 1998 BRP contains six design principles,⁴ eight goals,⁵ 70 objectives,⁶ 363 policies⁷ and 582 programs.⁸ For each of these there is at least one metric (and in some cases multiple metrics) that can help FORA board members and the public judge overall progress in achieving the principles, goals, objectives, policies and programs contained in the BRP. No comprehensive assessment of these principles, goals, objectives, policies and programs has ever been done. An evaluation of all of these items is an essential component of a complete reassessment of the BRP. However, given the short amount of time available for the reassessment process, it's unlikely that all of these items can be evaluated prior to December 2012. Therefore FORA and EMC should determine which principles, goals, objectives, policies and programs are the most important and therefore should be given the highest priority for evaluation.

The purpose of this evaluation is to give the FORA board and the public a more accurate picture of:

- How much progress has been made in achieving the goals and objectives of the BRP.
- How well the design principles and policies of the BRP have been followed.
- The extent to which the programs have succeeded.

We further suggest that for some of the goals and objectives, it would be useful to do a retrospective analysis of progress over time towards these goals and objectives. The following broad measures of performance are of particular interest to us:

- The amount of progress toward the completion of the Habitat Conservation Plan.
- A graph and table showing the number of new, non-construction related jobs added to businesses on the former Fort Ord for each year from 1998 to the present, broken down by full time versus part-time/seasonal; and broken down by category of salary/wages.⁹
- A graph and table of the amount of development fees collected for each year from 1998 to the present.
- A graph and table of total land sales amounts collected for each year from 1998 to the present.

* * *

Our subcommittee of the Ventana Chapter of the Sierra Club believes that it is not too late for the former Fort Ord to become a place of aesthetic beauty, environmental

³ Base Reuse Plan, Volume 3, page 1-4.

⁴ Base Reuse Plan, Volume 1, page 9.

⁵ Base Reuse Plan, Volume 1, page 17.

⁶ Base Reuse Plan, Volume 2, multiple pages.

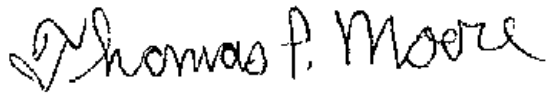
⁷ Base Reuse Plan, Volume 2, multiple pages.

⁸ Base Reuse Plan, Volume 2, multiple pages.

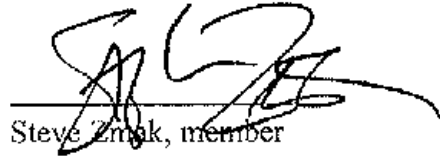
⁹ i.e., minimum wage to \$50K; \$50K to \$100k and more than \$100K or a similar set of categories.

protection, with an abundance of new and well-paying jobs. We respectfully request your attention to our above-described recommendations for assessment, review, and consideration of the Base Reuse Plan.

Sincerely yours,



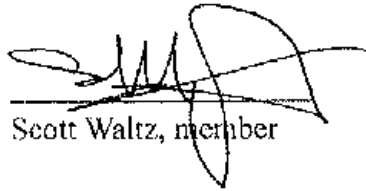
Tom Moore, Chair



Steve Zimak, member



Jane Haines, member



Scott Waltz, member

Michael Groves

From: john hutcherson [johnhutcherson@comcast.net]
Sent: Saturday, September 01, 2012 1:14 PM
To: Darren McBain
Subject: scoping report

Dear FORA

Please develop the blighted area of the Fort Ord military footprint before cutting down oak forest.

Take careful note of the advice of the Sierra Club and LandWatch before doing irreparable harm to the undeveloped portion.

John Hutcherson

480 San Bernabe Dr

Monterey CA 93940

johnhutcherson@comcast.net

Vickie Bermea

From: Larry Dick [larrydick@sbcglobal.net]
Sent: Sunday, September 02, 2012 11:02 PM
To: Darren McBain
Subject: Draft Scoping Report Comments

Draft Scoping Report Comments

Sirs/Madams:

I would like to take a few brief moments to comment on the For a Reuse Plan Draft. I have two issues that I believe are worthy of addressing.

- 1) I do not see any discussion among all the possible reuse scenarios for leaving Fort Ord 100% undeveloped. I realize this is a radical position, but none of the proposed reuses that I am aware of state why those plans are better than leaving the entirety of the area as open, wild, and undeveloped.

I see nothing in the report that puts a value on the land as a natural undeveloped wilderness. There is no doubt areas that are contaminated with unexploded ordnance and there are certainly areas that have been polluted with toxics. However I also see nothing in the report that addresses the clearing of the ordnance or removal of the toxics using minimalistic techniques that would leave the least degradation to the trees and habitat as possible.

What I do see are attempts to suggest that massive clear cutting of land as the preferred method of removal. I can only read these suggestions as a fraud to prepare the land for future development and building sites.

- 2) My other issue with the Reuse Plan is that the run down dilapidated housing, busted up roads, and concrete pads are not the prime focus of the development process. Notice I did use the term "blighted" as I have come to understand that the term is a legally defined term, and it includes the dilapidated housing as well as any of the areas where a spent bullet casing might be found. But I think that we all can agree, that the ugly wrecks of former barracks, etc. should be in a different classification than areas where remnants of material might be found if one searches hard enough.

It is simply unbelievable that there is any consideration of using the "woody" areas prior to a 100% reuse of the aforementioned wreckage.

Even if my positions are not adopted as the prevailing positions, any developer that puts a spade into the raw land, should be required as part of his building permit to perform cleanup work in the aforementioned wreckage before he can start knocking over trees in the woody bit.

In conclusion, I would mention that the large entirety of Fort Ord should be considered as an amazing gift from the government that we should treasure as an essentially pristine natural environment. We should not be looking at this as a massive land grab development opportunity for a bunch of carpetbaggers. We don't need housing, shopping centers, horse riding parks, bus terminals, etc. in this area as suitable sites for these things can all be found outside of the Fort Ord area. We don't need expanded tax bases in virgin land, and we certainly do not need to provide incentives to builders to despoil this resource. We need to become stewards and protectors of this land now and for future generations.

Lawrence Dick

16470 Twin Lakes Dr.
Royal Oaks, CA 95076

Vickie Bermea

From: Haines Jane [envirlaw@mbay.net]
Sent: Monday, September 03, 2012 4:37 PM
To: Darren McBain
Subject: Comments on Base Reuse Plan reassessment process

Dear FORA:

Before I criticize, I want to say how well-organized I think the Draft Scoping Report and appendices are on both the FORA website and on the CD. I was lucky to be loaned a CD of the Draft Scoping Report and appendices, and its excellent organization allowed me to review it in a fraction of the time it would have taken had it not been so well-organized.

My criticism is that the Base Reuse Plan was not available to the public in hard copy during the several months that the public was invited to comment on it (the website version of the BRP is difficult to understand because maps are separate from the text), and instead of providing CDs of the Draft Scoping Report and appendices at the August 29 special FORA meeting, FORA provided CDs containing charts and maps, neither of which I found particularly relevant to commenting on the Draft Scoping Report. As a former school teacher, it seemed to me analogous to giving students a homework assignment without providing them the textbook, with the "students" in this instance being the public that was invited to comment on documents that were not readily available.

I request that when the Final Scoping Report becomes available, FORA provide CDs of it in easily-accessible places (the FORA office is about a 40-minute roundtrip drive from P.G. and Carmel and nearly as far from Salinas, so how about leaving copies of the CDs somewhere we can pick them up in a closer location?). Additionally, if and when the BRP is updated and amended, how about providing CDs of it in easily accessible locations? My understanding is that CDs cost only pennies, so it seems to me like an inexpensive, effective way for FORA to foster informed public participation in Ft. Ord issues by providing the public opportunity to readily obtain the "textbook" the public needs for informed participation.

Yours sincerely,
Jane Haines
Pacific Grove

California Native Plant Society

2 Via Milpitas
Carmel Valley, CA 93924
Sept. 3, 2012

Board of Directors
Fort Ord Reuse Authority
930 2nd Ave., Suite A
Marina, CA 93933

RE: FORA DRAFT SCOPING REPORT

Dear Board Members:

The Monterey Bay Chapter of the California Native Plant Society would like to submit the following comments regarding the Draft Scoping Report for reassessing and updating the Base Reuse Plan.

Our chapter has a long history of involvement in issues affecting the native flora at Fort Ord. Indeed, local botanists who became founders of our chapter were studying and working to protect the rare plants and communities at Fort Ord even before our chapter was formed. Throughout the long process of closing the base we commented extensively on policies proposed for the Base Reuse Plan. Our members have led and participated in many field trips to acquaint the public with the botanical riches of Fort Ord. We enclose a page from our January 2012 newsletter briefly describing this history.

Our principal concern has always been the importance of directing redevelopment to the area of the Army's Urban Footprint before developing any undisturbed areas that provide significant plant or wildlife habitats. Updating the BRP is particularly urgent in the light of numerous development challenges and constraints that have arisen since the closure of the base, along with the recreational opportunities provided by the recent designation of the Fort Ord National Monument.

Another top concern must be the completion and implementation of the Habitat Conservation Plan. We urge that this seminal document, which has involved so much time and resources, should be updated and adopted by the relevant jurisdictions before any major projects are approved.

We are particularly disturbed by the lack of implementation of other critical policies in the BRP. One key policy basically forbids development approval until the open space and conservation policies of the BRP are incorporated into the general plans of the jurisdictions involved; yet analysis shows that many have not been so adopted, including a policy protecting oak woodland, whose proposed destruction aroused so much opposition to recent projects. Another is the plan for pedestrian-centered villages with riding and hiking trails surrounded by natural habitat, as described in the Regional Urban Design Policy. An example of a more specific policy that has not been implemented is to establish an open space corridor between Hwy 1 and the Dunes Shopping Center, landscaped with appropriate native plants, instead of the unattractive backside of the stores that is now unpleasantly obvious to passing traffic at the very entrance to the Monterey Peninsula. We realize many of these neglected policies require cooperation between several jurisdictions, but isn't that exactly what FORA was supposed to bring about?

We continue to urge inclusion of the following landscaping policies in an updated plan: 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 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. Invasive 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.

Thank you for the opportunity to be involved in this important process.

Sincerely yours,



Mary Ann Matthews, Conservation Chair

Encl.



Dedicated to the preservation of California native flora





Erysimum menziesii

The Wallflower

The Newsletter of the California Native Plant Society
Monterey Bay Chapter

<http://montereybay.cnps.org>

January 2012

Flora & Restoration of Fort Ord

Speakers: Bruce Delgado & David Styer

Tonight we'll take a fascinating look at Fort Ord, its rare plants and various restoration projects. Restoration efforts have included the use of sheep, fire, bulldozers—and "going public" with preliminary results of a 10-year "Floristic Survey."

David is a retired PhD Professor of Mathematics from University of Cincinnati, Ohio. He arrived in Monterey in 1996 and began inventorying the birds of Fort Ord. His love of Fort Ord led him to volunteer several years for the Bureau of Land Management (BLM), then in 2003 to begin inventorying the plants and butterflies of Fort Ord. As a lifelong and astute naturalist, David brings a dedicated passion to his efforts that is delightful and inspiring to those around him.

Bruce Delgado has worked as a botanist for BLM since 1988 and focuses on habitat restoration, fire ecology, sheep grazing, wild pig and invasive weed removal, and rare plant and animal protection. Bruce's portion of the program will cover these topics and provide an overview of natural resource management on Fort Ord.

General Meeting • Thursday, January 12

Visiting & Book Purchasing from 7:00pm
Meeting and Program Begin at 7:30pm

Pacific Grove Museum of Natural History

PRESIDENT'S MESSAGE

It's been an interesting total of nine years, but I am ready to step down. There are several people I would like to thank:

Immediate thanks to all the volunteers who contributed to the success of the CNPS state meeting our chapter hosted the first weekend of December. We couldn't have pulled it off without you. Brian & I have received several e-mails & letters commending our chapter for such a great meeting.

My deepest gratitude goes to Corky Matthews – I couldn't have done the job without her. She puts in an amazing number of hours each month making sure our public officials follow the environmental laws in place. Thanks also to Brian & Carol LeNeve – they do so much for this chapter, much of it behind the scenes. On behalf of the chapter I would also like to thank those volunteers who have stepped up to do so many jobs that keep

the programs and newsletters coming, keep our chapter financially solvent and keep the membership records straight.

I'm not disappearing, but I am stepping down. It's not good for the organization to have one person acting as perpetual president.

Thanks to all of you. It's been fun, excruciating, annoying, but mostly fun and a privilege.

CALENDAR of FIELD TRIPS & EVENTS

Sunday, January 1, 9:30am to 2:00pm Field Trip
New Year's day Manzanita Ramble

Start the new year with a pleasant hike around Manzanita Park. Leader Bob Hale hopes we will see the Pajaro manzanita in flower and enjoy the variety of Manzanita Park's chaparral and oak woodland habitats. Plan for a walk of about 3.5 miles and 350 feet elevation gain. We'll meet at the far end of the parking lot in front of RE1 in Marina off the Imjin Parkway exit at 9:30am. We should finish in the early afternoon. Bring snack or light lunch and water. For reservations call Lynn at 375-7777.

Friday, January 6, 9:30am to 4pm Field Trip & Event
Let's do the 'Shroom Shuffle!

Once again, we are so fortunate to have Phil Carpenter, local fungus expert and current President of the Fungus Federation of Santa Cruz, take us into the woods in January for a second field trip! Deep in the forest of Pebble Beach we'll discover an amazing variety of fanciful fungi, both delicious and deadly. Heavy rain cancels. About 2 miles with 300 ft. elevation gain. Meet in the parking lot of Whispering Pines Park in Monterey at Pacific and Alameda streets before 9:30. Bring lunch and water. CNPS & FFSC members only (join Friday!). Call leader, Lynn Bomberger for a reservation at 375-7777.

Saturday, January 7, 1pm to 4pm Restoration
Broom Bash, East Side of Pt. Lobos State Reserve

Join us on these First Saturdays of the month in the beautiful Monterey pine forest of East Point Lobos. We'll use several techniques to remove French broom and help restore this area that wants to thrive with native plants. Meet at 1pm in Carmel at the Rio Road Park n' Ride. All supplies provided. Bring a friend, water, and a snack. Contact Bruce Delgado at 277-7690 or bdelgado62@gmail.com for more information.

Friday, January 13, 9am to 2:30pm Restoration
Cape Ivy Weed Bash at Soberanes Creek

Join other volunteers and State Parks staff and help to reverse the spread of sticky eupatorium and Cape ivy in the wonderful Soberanes Creek watershed. One "Migrating" Friday each month

Calendar of Field Trips & Events Continued on Page 3

CNPS HAS A LONG HISTORY OF PLANT HABITAT PROTECTION AT FORT ORD

CNPS members attending the State Council Meeting at Sunset Center Dec. 2 were treated to an absorbing program on the important plants and habitats of Fort Ord by BLM Botanist Bruce Delgado and long-time volunteer David Styer, a presentation that will be repeated for our own members at the January general meeting. Even before CNPS existed, local botanists had been studying the unique plants and plant communities of the historic Army base. Shortly after the Monterey Bay Chapter was approved by the state board in 1966, an informal agreement was reached by chapter co-founder Bee Howitt and Gen. R.G. Fergusson, then commanding officer of Fort Ord, to set aside nine small plant reserves to protect certain rare plants that had managed to survive and even thrive on the busy base.

Earlier, in 1964, retired virologist Howitt from UC's Hastings Reservation and John Thomas Howell of the California Academy of Sciences had co-authored *The Vascular Plants of Monterey County*, pointing out that Monterey is "one of the richest and most important research areas for field studies in systematic botany in Western America." Soon the chapter was having regular field trips to Fort Ord and preparing plant lists that have now grown to over 900 species. With the passage of the Endangered Species Act in 1973, the reserves developed increasing significance, bringing the Army an award for its stewardship of the reserves.

Why are there so many rare plants at Fort Ord? the answer seems to be a combination of geology, geography, and climate. The sandy soil brought down by the Salinas River in glacial times weathered into the Aromas red sands, a sandstone-like formation. Later changing ocean levels created a thick layer of paler sand dunes on top of the older consolidated sands. The combination of sterile soil and moist, foggy conditions during the growing period provided a habitat where certain unusual plants could thrive without heavy competition from more common or invasive species.

This habitat became noted for the maritime chaparral that had developed throughout Fort Ord's sandy areas. Dominant in many areas are the shaggy-barked manzanitas, *Arctostaphylos tomentosa* and *A. crustacea*, and their various forms. Less common is the Monterey (aka "Toro") manzanita, *A. montereyensis*, which at first was known only from one plant near the Monterey airport. Also in the sandy areas are Hooker's manzanita, *A. hookeri*, Pajaro manzanita, *A. pajaroensis*, and sandmat manzanita, *A. pumila*. Frequently found with them are three blue-flowered ceanothus species, Monterey ceanothus, *Ceanothus cuneatus* var. *rigidus*; cropleaf ceanothus, *C. dentatus*; and blue blossom, *C. thyrsiflorus*. A real rarity is the southernmost stand of coast whitethorn, *C. incanus*. Other rarities found in the reserves include Monterey spineflower, *Chorizanthe pungens*; Eastwood's goldenfleece, *Ericameria fasciculata*; Coast wallflower, *Erysimum ammophilum*; sand gilia, *Gilia tenuiflora* ssp. *arenaria*; and Seaside bird's-beak, *Cordylanthus rigidus* ssp. *littoralis*. Many plants have been added to the list by indefatigable plant hunter David Styer in recent years..

A tenth plant reserve had been established in the western dunes to protect the habitat of Smith's Blue Butterfly, but all of the reserves existed in a sort of limbo because they had no legal standing. However, in 1998 the Army decided to close down the Ammunition Supply Points (ASPs) in the dunes and move the contents to one large, secure location inland. Unfortunately this involved removing a large acreage of maritime chaparral. As mitigation for this loss, the Army signed an agreement with CNPS to establish the reserves permanently. Consequently, when the base closed in 1991, most of the land encompassing the reserves went to the BLM along with the impact areas to the south and the highlands and grasslands on the east. The dunes, including two reserves, went to the State Parks Department. Recreationists, scientists, hikers, and plant enthusiasts have reason to be glad that these early efforts led to the preservation of so much open space.

However, there have been constant efforts by development interests to insert major projects into areas that have great value for low impact recreation and habitat preservation, particularly areas serving as wildlife corridors between the dunes and the BLM lands. With the prospect of FORA (the Fort Ord Reuse Authority) phasing out in 2014, some highly destructive proposals like the Eastside Parkway and Whispering Oaks (dubbed "Whimpering Oaks" by opponents) are being pushed ahead. All who support the sensitive and rational development of Fort Ord need to be watchful and involved in decisions made in coming weeks and months.



REMINDER: JANUARY 9 IS THE DEADLINE FOR COMMENTING ON THE PEBBLE BEACH BUILD-OUT EIR, AVAILABLE ON LINE OR CONTACT CORKY MATTHEWS (SEE MASTHEAD)

Pam Krone-Davis
2090 Mariposa St.
Seaside, CA 93955

Fort Ord Reuse Authority
920 2nd Avenue; Suite A
Marina, CA 93933

9/3/12

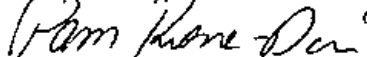
SUBJECT: Fort Ord Reuse Plan Reassessment Draft Scoping Report 2012

Dear Chair Potter and Members of the Board:

I have reviewed elements of the Draft Scoping Report and would like to comment specifically on the prioritization of the removal of vacated buildings that currently blight the previous Fort Ord Lands. As a CSUMB student, I ride past many of these buildings on a daily basis and find that they greatly detract from the feeling of safety and security in the area and from the beauty and sense of social health and well-being. Building in the blighted areas should be a first priority and should be central to large development efforts, such as Monterey Downs and other projects. By requiring these projects to incorporate the development of blighted areas into their plans, removal of the vacated buildings would become a shared goal. It makes no sense to allow building and development in the most scenic areas of Fort Ord, the current oak woodlands, while directly adjacent to planned developments there are decaying buildings with broken windows, boarded doors and crumbling parking lots. Requiring Fort Ord development projects to remove the vacated buildings and build in these locations will improve the economic potential of the area as the current blight is certainly a detraction from the value of this land and its surrounds. Requiring that all development proposals incorporate the development of blighted areas into their development plans should be incorporated into the Reuse Plan.

I would also like to comment that the Report (Chapter 3, Table 7) estimates a surplus of commercial footage and residential units. In an area facing declining housing prices and considerable stress on the housing market even in the absence of development, the slowing of further development would help strengthen the currently over-saturated housing market. While the Report notes that these developments cannot be withdrawn without the permission of those entitled, delaying the development of the infrastructure to support these developments could slow down the pace of growth and prevent exacerbating the current housing price downfall. The higher end home sale pace has slowed to a crawl in this area, and it makes sense to require more affordable housing in any new development on Fort Ord Lands.

Respectfully,


Pam Krone-Davis

Michael Groves

From: Pat McNeill [pmcneill@sbcglobal.net]
Sent: Monday, September 03, 2012 3:44 PM
To: Darren McBain
Subject: Reassessment Comments

The good news from the reassessment report is that there is no rush. There is time to take a deep breath and learn from 16 years of experience. There is no housing boom. There is no demand for commercial real estate. Fort Ord closed 16 years ago. The jobs are gone. The workers have gotten on with their lives. There was no “promise” to replace jobs, only a good faith plan. There is no urgency.

The Monterey Bay area has received gift. While most popular places in the world are being crushed by population growth and pollution, Monterey got downsized! We have the opportunity to learn to live within our budget and be a tourist destination forever. We can avoid becoming a mini-San Jose.

The reassessment document points in this direction. It is time to focus creative thinking towards problem solving for the future rather than trying to make an outdated plan meet non-existent needs.

Finally, I started my Army enlistment at Fort Ord. I was promised a lot of things but a plot in a Veterans Cemetery was not one of them. I am a Viet Nam veteran and I am embarrassed by those wrapping themselves in the flag and demanding a Veterans Cemetery at any cost.

Pat McNeill

The plural of anecdote is not data.

Observation>>Hypothesis>>Evidence>>Theory. And Correlation does not denote cause.

From: Pat McNeill [pmcneill@sbcglobal.net]
Sent: Monday, September 03, 2012 3:57 PM
To: Darren McBain
Subject: Base redevelopment plan

I started my Army enlistment at Fort Ord. I was promised a lot of things but a plot in a Veterans Cemetery was not one of them. I am a veteran of the Viet Nam war and I am embarrassed by those wrapping themselves in the flag and demanding a Veterans Cemetery at any cost. I feel that the veteran's patriotism was hi-jacked to recruit them as soldiers and now it is being hi-jacked by a Los Angeles developer so he can get title to a huge tract of land that includes acres and acres of coast live oak. Digging up trees to make holes for caskets? I will have none of it. My dead body will amount to 140 lbs of water and 10 lbs of minerals, and 5 lbs of fat. It is not more important than a 200 year old tree.

Ft Ord is an island in the midst of a sea of agricultural fields and urban development. It has no wildlife corridors to the south, north, or east. It is fragile. Contrary to what is rapidly becoming popular belief, most of the national monument is grassland and chaparral. The rarer oak woodland is on parcels currently vulnerable to development. There is land on Ft. Ord that is suitable for a cemetery. It is either naturally open or has been razed by wildfire or munitions clearing. That is the kind of place a veteran's cemetery can bring peace to.

Pat McNeill

The plural of anecdote is not data.

Observation>>Hypothesis>>Evidence>>Theory. And Correlation does not denote cause.

From: Lena Spilman [Lena@fora.org]
Sent: Tuesday, September 04, 2012 8:39 AM
To: Jonathan Garcia; Darren McBain; Steve Endsley
Subject: FW: LandWatch comment letter on draft scoping report

This went to the Board over the wknd. Wanted to make sure you got a copy also.

Lena Spilman
Fort Ord Reuse Authority

From: Amy White [<mailto:awhite@mclw.org>]
Sent: Sunday, September 02, 2012 12:40 PM
To: board
Subject: LandWatch comment letter on draft scoping report

Dear FORA Board,

Attached is the LandWatch letter on the draft scoping report. Thank you for the opportunity to comment.

Thanks and sincerely,

Amy L. White, Executive Director
LandWatch Monterey County
150 Cayuga Street, Suite 9
Salinas, CA 93901
831-75-WATCH (92824)
www.landwatch.org



Post Office Box 1876, Salinas, CA 93902
Email: LandWatch@mclw.org
Website: www.landwatch.org
Telephone: 831-759-2824
FAX: 831-759-2825

September 3, 2012

Fort Ord Reuse Authority
Attn: Chair Potter and FORA Board
920 2nd Avenue; Suite A
Marina, CA 93933

SUBJECT: COMMENTS ON FORT ORD REUSE PLAN REASSESSMENT DRAFT
SCOPING REPORT

Dear Chair Potter and Members of the Board:

LandWatch Monterey County has reviewed the Draft Scoping Report, and we have the following comments:

1. Chapter 1 of the Scoping Report describes the Fort Ord Reuse Authority's (FORA) roles and responsibilities. P. 1-8 In terms of land use and development, the description omits a discussion of FORA's responsibility as a CEQA lead agency and related responsibilities for assuring implementation of the Base Reuse Plan and its programs and policies.

CEQA Guidelines, Section 15097. **Mitigation Monitoring or Reporting**

(a) This section applies when a public agency has made the findings required under paragraph (1) of subdivision (a) of Section 15091 relative to an EIR ...In order to ensure that the mitigation measures and project revisions identified in the EIR or negative declaration are implemented, the public agency shall adopt a program for monitoring or reporting on the revisions which it has required in the project and the measures it has imposed to mitigate or avoid significant environmental effects. A public agency may delegate reporting or monitoring responsibilities to another public agency or to a private entity which accepts the delegation; however, until mitigation measures have been completed the lead agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the program.

(b) Where the project at issue is the adoption of a general plan, specific plan, community plan or other plan-level document (zoning, ordinance, regulation,

policy, the monitoring plan shall apply to policies and any other portion of the plan that is a mitigation measure or adopted alternative. The monitoring plan may consist of policies included in plan-level documents. The annual report on general plan status required pursuant to the Government Code is one example of a report program for adoption of a city or county general plan.

The annual reports should be included in the Appendix of the Scoping Report.

2. The Market Study finds that:
 - The estimated 20 year demand for residential units in the vicinity of Fort Ord is 3,600;
 - Currently nearly 4,500 un-built residential units are entitled;
 - Build-out of the 4,500 units is anticipated to take 40 years;
 - Job growth is paramount in the Peninsula's residential recover -- in other words, if the jobs do not appear, the 40 year build-out projection will in reality take much longer; and
 - Removal of derelict Army buildings needs to be prioritized to provide a better vision of future economic development.

The Reassessment Document should recommend an update to the Base Reuse Plan (BRP) to address the over-supply of housing accommodated in the BRP and removal of urban blight.

3. We recommend that the contents of Table 8, which is 152 pages long, be summarized. Our findings indicate that of the 738 policies and programs evaluated for implementation, the Cities of Seaside and Marina and the County of Monterey have completed 21%; 21% are incomplete; 55% are ongoing and 3% fall in other categories. The County of Monterey, in particular, has fallen short of implementation requirements. Of the 259 applicable policies, only 16% have been completed, and 27% are incomplete.

The Reassessment Document should recommend that an implementation schedule for completion of the remaining programs and policies be prepared and that it be adopted by the FORA Board.

4. While many policies and programs have not been implemented by the individual cities and the County, 19 policies which are required to be implemented by all three jurisdictions are incomplete and are summarized below. Many of these policies are essential to protecting natural resources on the former Fort Ord:

Program F-1.1: Guidelines to enhance working relationship between FORA and the local homeless representatives.

Program B-2.1: Prohibit card rooms or casinos.

Program A-1.4: Minimize or eliminate land uses which may be incompatible with public lands

Program B-12 and Program C-1.5: Identify local truck routes.

Program A-1.2: Identify locations for bus facilities with funding and construction through new development.

Policy C-1: Establish an oak tree protection program to ensure conservation of existing coastal live oak woodlands in large corridors with a comprehensive open space system.

Recreation Policy G-1: Use incentives to promote development of an integrated, attractive park and open space system and Policy G2: Encourage creation of private parks and open space as part of private development.

Recreation Policy G-4: Coordinate development of park and recreation facilities.

Program C-2-1: Install interpretive signs related to biological resources.

Program E-1.1: Implementation plan for habitat management.

Program E-1-1 and Program E-2.1: Implementation of annual monitoring reports to BLM and Land Use Status Monitoring.

Program A-1.1 Establish noise criteria; Program A-1.2 Adopt noise performance standards, and Program B-1.1 Implement a program identifying developed areas adversely affected by noise.

Program A-1.2: Establish fault setback requirements.

Program C-1.3: Identify critical facilities inventory in conjunction with emergency and disaster agencies.

5. We disagree with the findings regarding Policies C-3.1 and C-3.2. The policies and findings from the Scoping Report follow:

Policy C-3.1: The City/County shall continue work with the Monterey County Water Resources Agency (MCWRA) and Monterey Peninsula Water Management District (MPWMD) to estimate the current safe yields within the context of the Salinas Valley Basin Management Plan for those portions of the former Fort Ord overlying the Salinas Valley and Seaside groundwater basins, to determine available water supplies.

Scoping Report Finding: Ongoing. The jurisdictions communicate with and support efforts to conserve water and maintain water withdrawals within the FORA allocation.

Comment: The finding does not address how the jurisdictions are working with the MCWRA and MPWMD to estimate current safe yields to determine available water supplies.

Program C-3.2: The City/County shall work with the MCWRA and MPWMD appropriate agencies to determine the extent of seawater intrusion into the Salinas Valley and Seaside groundwater basins in the context of the Salinas Valley Basin Management Plan and shall participate in developing and implementing measures to prevent further intrusion.

Scoping Report Finding: Seawater intrusion is monitored by the MCWRA. The jurisdictions enable monitoring and sharing of data as applicable.

Comment: The finding does not address how the jurisdictions are working with MCWRA and the MPWMD to determine the extent of seawater intrusion or measures to prevent further intrusion.

6. Of the 18 mitigation measures included in the FEIR for the BRP, three are incomplete. These include the failure of the City of Marina and the County to adopt and enforce a stormwater detention plan in order to increase groundwater recharge and thereby reduce potential for further seawater intrusion and augment future water supplies (see comments regarding Policies C-3.1 and C-3.2). The three jurisdictions have also not completed a comprehensive drainage plan. Design guidelines for proposed development on the bluffs have also not been completed.

The Reassessment Document should recommend that an implementation schedule for completion of the remaining programs and policies be prepared and that the schedule be adopted by the FORA Board.

7. The report identifies requirements for both general and specific consistency determinations. P. 4-171. It also identifies consistency findings made by the FORA Board. The report, however, does not evaluate the adequacy of the findings. We expected an analysis of the consistency findings, and are disappointed to find only a summary of FORA's determinations.

Given the failure of the Cities of Marina and Seaside and the County to implement many of the BRP programs, policies and mitigation measures, findings of consistency are problematic given the criteria described on pp. 171-176 of the report. For example, specific consistency criterion (a) states:

Prior to approving any development entitlements, each land use agency shall act to protect natural resources and open spaces on Fort Ord territory by including the open space and conservation policies and programs of the Reuse Plan, applicable to the land use agency, into their respective general, area, and specific plans.

As identified under 3 above, the following applicable policy has not been implemented by all three jurisdictions:

Policy C-1: Establish an oak tree protection program to ensure conservation of existing coastal live oak woodlands in large corridors with a comprehensive open space system.

8. The East Garrison/Parker Flats land use swap is described in the report. P. 4-266. The description is incomplete and should address the swap as it related to housing development at Parker Flats. The FORA and County staff reports prepared for the swap in addition to the ESCA transfer documents should be provided in the Appendix.
9. The following finding appears to have a contradiction as indicated in bold. p. 4-230.

The Bayonet and Black Horse golf course irrigation wells draw from the Seaside Groundwater Basin. However, these wells are no longer used for golf course irrigation, and the golf course is supplied with 400 acre-feet per year from Seaside's Salinas Valley Groundwater Basin allocation. Ultimately, the City of Seaside intends to use augmentation water (presumably recycled water) to irrigate the golf courses, and use the Salinas Valley Groundwater Basin water for development projects.

10. Reference is made to the lower Salinas River dam indicating it was construction in 2010. P. 4-233. This should be updated to indicate that the dam failed in 2011 and has yet to be replaced.

Thank you for the opportunity to review the document.

Sincerely,



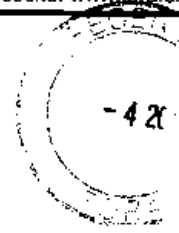
Amy L. White
Executive Director



FORT ORD REUSE AUTHORITY

920 2nd Avenue, Suite A, Marina, CA 93933
Phone: (831) 883-3672 – Fax: (831) 883-3675
Website: www.fora.org

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FORT ORD REUSE PLAN REASSESSMENT COMMENT FORM SCOPING REPORT

FORA welcomes public input on the Scoping Report, as it relates to the 1997 Fort Ord Base Reuse Plan reassessment process. The 1997 Base Reuse Plan was created as a 40-60 year plan. The overall goal of the reassessment process is to explore whether objectives and policies in the Base Reuse Plan should be updated to better address current conditions and meet the community's future needs. A Reassessment Report will be prepared for this purpose. The Reassessment Report will include a range of options that the FORA Board of Directors may wish to consider for possible future action related to the Base Reuse Plan.

The Scoping Report includes a summary of information collected about the implementation of the Base Reuse Plan since it was approved 15 years ago. The Scoping Report also includes an analysis of current and future economic and market conditions and trends. The Scoping Report will be used as a basis for identifying possible options for consideration that may be included in the Reassessment Report for future consideration or action by the FORA Board.

Comments submitted by 5:00 PM on September 4, 2012, will be included in the Final Scoping Report scheduled for release on September 7, 2012. Comments received after this deadline will be accepted but will not be included in the Final Scoping Report document and may not be included in the Board packet for the FORA Board meeting on September 14, at which the Board will consider accepting the Scoping Report. Comments can also be presented on September 14 at the FORA Board meeting, but those comments will not be included in the Final Scoping Report document.

Commenter Name:

Bill Leone

Address (Optional):

1075 Tweed Place, Seaside, Ca 93955

Email (Optional):

bleone2@juno.com

FORA cannot directly respond to each and every comment that is submitted; however, all comments will be reviewed.

Comments can be submitted to FORA by email: plan@fora.org; FAX: 831-883-3675; or mail to: FORA, 920 2nd Avenue, Suite A, Marina CA 93933. For more information about FORA or the Base Reuse Plan, visit the FORA website at www.fora.org or contact Darren McBain at FORA, (831) 883-3672.

Space for written comments is provided on the reverse side.



SIERRA CLUB
FOUNDED 1892

5

PLEASE SUBMIT COMMENTS BY 5:00 PM SEPTEMBER 4, 2012

COMMENTS

FORA must be investigated by federal authorities
for corruption, incompetence & fraud.
The goals you are working toward are
unattainable!

Seaside City Council & Mayor need to
do some keyhole research:
Gambling institutions (race tracks &
casinos) undermine & eventually destroy the
integrity of communities.
You will be voted out of office!

If additional space is needed, please attach additional sheets.

Comments can be submitted to FORA by email: plan@fora.org; FAX: (831) 883-3675; or mail to: FORA, 920 2nd Avenue, Suite A, Marina CA 93933. For more information about FORA, the Base Reuse Plan, or the workshops, visit the FORA website at www.fora.org or contact Darren McBain at FORA, (831) 883-3672.

Si tiene preguntas o necesita informacion o traduccion en espanol, favor de llamar a Jonathan Garcia o Darren McBain al 831-883-3672.

September 4, 2012

Fort Ord Reuse Authority
920 2nd Street, Suite A
Marina, California 93933

Re: Scoping Report on Fort Ord Base Reuse Assessment

To Whom It May Concern:

In reading the Scoping Report, there are three things we would like to note:

1. Figure 7.2, Page 4-195 of the Report: There is a notation of "EQ" for Equestrian Center Site Opportunity located near the East Garrison project. Please note that in 2002, this opportunity site was moved from East Garrison to Parker Flats. The map should be updated accordingly.
2. Page 4-266 of the Report: This section discusses the East Garrison-Parker Flats Land Swap, but does not discuss the fact that an equestrian cross-country course was permitted within the Oak Oval/Habitat Management Parcel as a part of the land swap. The cross-country course allows for a course both in and out of the Oak Oval, extending into the rest of the County's FORHA lands if needed, and also permits permanent obstacles for the course and course maintenance. This is not discussed in the report and should be included.

Sincerely,

Connie Quinlan
Monterey Horse Park

From: Denyse Frischmuth [denyse.f@att.net]
Sent: Tuesday, September 04, 2012 12:59 PM
To: Darren McBain
Subject: Comments from CSMC

September 4, 2012

Fort Ord Reuse Authority
920 2nd Ave., Suite A
Marina, CA 93933

To all concerned,

We are submitting this statement on behalf of Communities for Sustainable Monterey County (CSMC), the umbrella organization for eight local sustainability groups including Marina, Seaside, Salinas, and Monterey.

The Draft Scoping Report's economic analysis is rather clear that the economic and demographic landscape and future outlook of our area have changed dramatically since the writing of the Base Reuse Plan in 1997. The vision that inspired that plan assumed conditions that never materialized and are not likely to do so in the foreseeable future. The demand for additional housing has migrated sharply downward both in terms of number and price range, and our area has an over abundance of unoccupied commercial space.

The creation of the National Monument is another very important change altering the conditions to be considered in land use planning. The kind of properties and their use for the area surrounding this new gem in our midst must be reevaluated in light of the important economic value the Monument represents. National Monuments are magnets for tourism, boosting the local economy and opening the market for more employment of a durable nature.

Eco-tourism is a concept that has evolved greatly since 1997 and is now part of the economic landscape. The natural beauty of Fort Ord, its rich ecosystem and spectacular views reveal a precious resource in our own backyard that other areas would give anything to have. Let's not squander this treasure. Once paved over and its natural environment destroyed, it's final and irreversible.

In light of these new developments that have emerged since 1997, CSMC urges FORA to reevaluate the Base Reuse Plan, to update it, that is to bring it up to date to reflect the new reality.

Thank you for your attention and consideration.

Sincerely

Denyse Frischmuth
President
Communities for Sustainable Monterey County





September 4, 2012

Fort Ord Reuse Authority
920 2nd Ave., Suite A
Marina, CA 93933

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We are submitting this statement on behalf of Communities for Sustainable Monterey County (CSMC), the umbrella organization for eight local sustainability groups including Marina, Seaside, Salinas, and Monterey.

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In light of these new developments that have emerged since 1997, CSMC urges FORA to reevaluate the Base Reuse Plan, to update it, that is to bring it up to date to reflect the new reality.

Thank you for your attention and consideration.

Sincerely

Denyse Frischmuth
President
Communities for Sustainable Monterey County

Vickie Bermea

From: Doug Yount [dyount@ci.marina.ca.us]
Sent: Tuesday, September 04, 2012 1:32 PM
To: Darren McBain
Cc: Steve Endsley; Christine di Iorio; Theresa Szymanis
Subject: comments on draft BRP Reassessment Scoping Report

To Whom It May Concern:

The City of Marina is planning to submit comments regarding the scoping report. Unfortunately, with limited staffing, this review is not yet complete, but will be provided at or prior to the September 14 date for the hearing on the report at the FORA Board meeting. Thank you.

Douglas A Yount
Interim City Manager
City of Marina
211 Hillcrest Avenue
Marina, CA 93933
www.ci.marina.ca.us
(831) 884-1281

From: Justin Wellner [jwellner@csumb.edu]
Sent: Tuesday, September 04, 2012 4:07 PM
To: Darren McBain
Cc: Steve Endsley; Michael Groves; Candance Ingram; Richard James; David Zehnder
Subject: CSUMB's Comments to the Draft Scoping Report
Attachments: Final Draft CSUMB Comments to FORA BRP Scoping Report .pdf

Please see attached. Please note we flag some items we hope can be amended in the final draft.

--
Justin Wellner
Director of Governmental & External Relations
Office of the President
California State University, Monterey Bay
100 Campus Center
Seaside, Calif 93955
jwellner@csumb.edu
Phone (831) 582-3044
Cell (831) 402-9462
Fax (831) 582-4117

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Office of the President
100 Campus Center
Seaside, CA 93955-8001
831-582-3532
Fax 831-582-3540

September 4, 2012

Dave Potter
Chair
Fort Ord Reuse Authority
920 2nd Ave., Suite A
Marina, CA 93933

Dear Supervisor Potter,

On behalf of California State University, Monterey Bay (CSUMB), I am writing to submit the University's comments to the Draft Scoping Report of the Fort Ord Base Plan Reassessment. The attached appendix provides recommended changes and technical corrections to the Market Study Summary (Chapter 3), Reuse Plan Implementation Status (Chapter 4), and the full Market and Economic Analysis (Appendix E). The appendix also offers general feedback to the content of the report as well.

Overall, CSUMB is pleased with the Draft Scoping Report and in particular the analysis provided in the Market Study Summary and Reuse Plan Implementation Status. However, CSUMB urges the final draft to address how the local educational institutions are training a future regional workforce, the importance of maintaining and improving local roadways, and the compatibility of development projects to CSUMB's Master Plan. The University does appreciate that the report encourages partnerships and collaborations around research and educational related development and recommends a renewed focus on removal of blight. CSUMB is also grateful for the report's review of the Base Reuse Plan's objectives, policies, and programs, as it calls to attention that a number of these items are either incomplete or considered ongoing. CSUMB is prepared to work alongside the land use and regional jurisdictions and involve our faculty and students to provide technical expertise in these dialogues.

CSUMB supports the framework of the Fort Ord Reuse Plan and looks forward to continuing to work with you throughout this reassessment process. Please feel free to contact Justin Wellner, Director of Governmental and External Relations, if you have questions regarding the information provided in the attachment.

Sincerely,

Eduardo M. Ochoa, Ph.D.
Interim President

Appendix: CSUMB Comments on Draft Scoping Report of the Fort Ord Base Reuse Plan Reassessment

Recommended Changes to Market Study Summary (Chapter 3)

CSUMB is generally pleased with the content contained in the Market Study Summary (and discusses these items in greater detail below). However, the University encourages the final report to reflect several important amendments.

Despite strong evidence outlined throughout the summary report suggesting a lack of demand for such, the report makes several references to investing in housing in the short-term as "jobs follow housing". Unfortunately, the summary report makes no references to an existing workforce that is currently being trained in the area. CSUMB is a growing comprehensive university, which currently enrolls more than 5,300 students and is expected to grow to a capacity of 8,500 full time equivalent (FTE) and 3,500 distance learners. CSUMB's (as well as the other educational institutions in the region) ability to annually graduate a highly skilled workforce is what should be the focus of attracting employers to the region, not housing. We encourage the final draft to reflect this rationale and to seek opportunities to capitalize on partnerships with companies and businesses seeking to locate near an educational institution.

The summary report seems to concentrate discussion around regional roadways and capital improvements and the need and timing of these investments being tied to future development (pages 3-3, 3-12, and 3-14). CSUMB is concerned that not enough emphasis is being placed on maintaining and improving the existing local roadways. The Base Reuse Plan notes the importance to build on and update the existing transportation network, as it will prolong the creation of expensive regional roadways. For example, the development of East Garrison and further build out of The Dunes is making it imperative to address the maintenance and repair of the local roadway referred to as 8th Street, which is part of FORA's Capital Improvement Program. Unfortunately, FORA has elected to prioritize funding regional roadways over 8th Street. CSUMB encourages the summary report to discuss local roadways as well and in particular under policy response 3 on page 3-12.

Page 3-10 of the Market Study Summary discusses the structure of the FORA Board and notes that the size and decision making process of the Board should be examined, as to ensure that needs of the land use jurisdictions are being met. While CSUMB is not a land use jurisdiction, the University owns a large amount of property on Fort Ord, is a major economic stakeholder, and is regularly impacted by the decisions of FORA. CSUMB and the other ex-officio members of FORA have continually advocated for opportunities to have a stronger voice in the decision making process. CSUMB recommends the summary report be amended in this section to also recognize the needs of those that substantially contribute to effective implementation of the Base Reuse Plan and control significant areas of the base.

CSUMB supports offering incentives to future development targeted at beneficial projects such as those aligned with the education mission of the Base Reuse Plan. While this is referenced throughout the summary report, CSUMB recommends it be added as an example under policy response number 5 on page 3-12.

Market Study Summary Feedback (Chapter 3)

CSUMB supports components of the policy priorities and options for policy response identified in the Market Study Summary.

Placing emphasis on attracting “creative classes” to the region and aligning enterprises to institutional initiatives is conducive to one of the Base Reuse Plan's core principles to build the former base around the educational entities, like CSUMB. As a Hispanic Serving Institution and one that is committed to serving first generation students, the University supports placing more emphasis on inclusion of multicultural and underserved populations.

CSUMB also favors many of the options for policy response outlined in the Market Study Summary. The University appreciates that the report notes important academic fields that are a focal point of CSUMB, such as nursing, kinesiology, marine science, and environmental studies, and stands ready to engage in efforts to invest in research related development adjacent to the campus or existing infrastructure near the campus. CSUMB believes it is imperative to build partnerships across and amongst the various jurisdictions. The University also encourages collaborations directed at investing in long-term sustainable economic opportunities and creating a comprehensive marketing and branding strategy to promote these ideas. The University is prepared to work alongside the land use and regional jurisdictions and involve our faculty and students to provide technical expertise in these dialogues.

CSUMB is very concerned with removing the former military structures on and adjacent to the campus. They pose a number of challenges to the campus and land use jurisdictions, including safety and environmental hazards, aesthetics, and financial drain. The University appreciates the Market Study Summary recommending a renewed focus on removing such blight and that alternative funding mechanisms should be examined to expedite this process.

Recommended Changes to Reuse Plan Implementation Status (Chapter 4)

CSUMB supports the land use elements of the Base Reuse Plan, but is concerned over how they are being implemented by FORA and the local jurisdictions. There have been a handful of projects proposed next to CSUMB that the University has struggled to understand how they meet various reuse policies, objectives, plans and promote land use consistency with the campus. CSUMB is disappointed that the Scoping Report's analysis conducted to determine consistency of the Base Reuse Plan with the University's Master Plan does not appear to go into much depth (page 4-209). In particular, there is no analysis of compatibility of projects adjacent to the campus and how such projects align

with the goals and objectives of CSUMB and its Master Plan. CSUMB urges that this analysis take place, as it will reinforce a key theme of both the initial Base Reuse Plan and the Scoping Report that CSUMB is the core of the redevelopment of Fort Ord.

The chapter includes several incorrect facts and figures regarding CSUMB. On page 4-236, the report references an enrollment of 12,000 students. CSUMB plans to service 8,500 FTE students and 3,500 distance learners. Similarly, page 2-249 quotes a population of 12,000 students and 12,500 with distance learners. Again, CSUMB asks that the numbers be amended to state 8,500 FTE students and 3,500 distance learners. Additionally, CSUMB recommends noting that 60 percent of the FTE students will be provided with on-campus housing, according to the University's Master Plan. The acreage listed for CSUMB varies throughout Chapter 4. The correct acreage for CSUMB is 1,387.7.

Reuse Plan Implementation Status Feedback (Chapter 4)

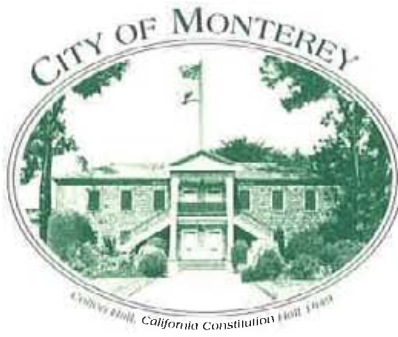
CSUMB appreciates the Scoping Report reviewing the Base Reuse Plan's objectives, policies, and programs and assessing the status of completion of these items. While CSUMB supports the objectives, policies, and programs of the Base Reuse Plan, the University is concerned over how they are being implemented by FORA and the local land use jurisdictions. The results of this review validate our apprehensiveness, as a number of items are either incomplete or considered ongoing. CSUMB is particularly alarmed over those that address such things as noise, water quality, transportation, land use, parks, recreation facilities, trails, bikeways, truck routes, pedestrians, and residential zoning. Below is a comprehensive list of outstanding items CSUMB strongly recommends FORA and the local jurisdictions prioritize to complete. A concerted strategy to direct attention to this list will contribute toward accomplishing the policy priorities and options for policy response outlined in the Market Study Summary.

- Program A-1.2 (Page 4-5)
- Program C-1.4 (Page 4-9)
- Program E-1.1 (Page 4-11)
- Program E-3.2 (Page 4-14)
- Program J-1.1 (Page 4-20)
- Program B-2.1 (Page 4-27)
- Program E-2.2 (Page 4-32)
- Program B-1.2 (Page 4-35)
- Program E-1.4 (Page 4-49)
- Program A.1.1 (Page 4-50)
- Program A-1.4 (Page 4-52)
- Program B-1.2 (Page 4-59)
- Program C-1.5 (Page 4-60)
- Program A-1.2 (Page 4-63)
- Program A-1.1 (Page 4-65)
- Land Use and Transportation Policy A-2 (Page 4-69)

- Program F-2.1 (Page 4-78)
- Recreation Policy G-4 (Page 4-80)
- Biological Resources Policy A-1 (Page 4-99)
- Biological Resources Policy (Page 4-100)
- Biological Resources Policy B-2 (Page 4-116)
- Noise Policy A-1 (Page 4-134)
- Hydrology and Water Quality (Page 4-160)

Recommended Changes to Fort Ord Base Reuse Plan Reassessment – Market and Economic Analysis (Appendix E)

The market and economic analysis includes several incorrect facts and figures regarding CSUMB. The student enrollment, acres, and housing numbers on page 17 are not representative of the Campus Master Plan. CSUMB projects an enrollment of 8,500 FTE students and 3,500 distance learners and anticipates 60 percent of the FTE students will be provided with on-campus housing (equating to approximately 8,300 housing units). The correct acreage for CSUMB is 1,387.7. CSUMB has been allotted 1,035 acres of feet of water. Page 18 notes 646 acres, which the University assumes means the number we have left allocated for development. If this is not the case, the number should be adjusted based off our allotment of 1,035 acres. The 10,000 students noted on page 21 and A-3 should be adjusted to 8,500 FTE students and 3,500 distance learners.



September 4, 2012

Mayor:
CHUCK DELLA SALA

Councilmembers:
LIBBY DOWNEY
JEFF HAFERMAN
NANCY SELFRIDGE
FRANK SOLLECITO

City Manager:
FRED MEURER

Darren McBain, Project Manager
Fort Ord Reuse Authority
920 Second Avenue, Suite A
Marina, CA 93933

Via Fax: 831-883-3675

RE: Base Reuse Plan Draft Scoping Report

Dear Mr. McBain,

Thank you for the opportunity to comment on the Base Reuse Plan Draft Scoping Report, the first of three documents in the reassessment process. The Scoping Report presents the findings of public input and independent investigation into a number of aspects of BRP implementation.

The following comments pertain to language on page 4-209 that specifically pertains to Monterey's parcels:

- The Monterey General Plan was adopted in 2005, not 2011.
- The Monterey General Plan was never submitted for evaluation by FORA for consistency with the BRP, however the land use designations for the properties in question (adjacent to the City's Corporation Yard) are indeed consistent. Upon annexation of the City's former Fort Ord property in 2000, the City amended the General Plan to apply the "Industrial" land use designation to these parcels, which are designated by the BRP as Public Facility/Institutional. These parcels are intended to provide for an expansion of the City's facilities or compatible uses. The BRP Public Facility/Institutional designation allows for light industrial, corporate and transit yards, public utilities and infrastructure, public training grounds, public offices, community colleges, youth camps, habitat management, and public aviation related uses. The General Plan Industrial designation is applied to existing and future industrial areas in the city, which mostly take the form of business parks with a combination of office and industrial uses.

The FORA Board never made the required finding for consistency between the General Plan and the BRP. Because the uses and densities permitted by both BRP and General Plan are consistent, no conflict exists. Staff will submit a request to FORA for a formal consistency determination and fulfill this requirement.

I would also like to echo comments submitted in our August 10, 2012 letter with respect to the City's interest in making minor adjustments to the Caltrans and Fort Ord Expressway rights-of-way to make them concurrent with parcel boundaries and consistent with proposed land uses.

We look forward to continuing our participation throughout the BRP reassessment process. If you have specific questions regarding our comments, please contact Elizabeth Caraker, Principal Planner at 646-1739.

Sincerely,

A handwritten signature in cursive script that reads "Fred Meurer".

Fred Meurer
City Manager

c: City Council

From: Gail Morton [gmorton@montereyfamilylaw.com]
Sent: Tuesday, September 04, 2012 4:54 PM
To: board; Darren McBain
Subject: Fort Ord Rec Users re Draft Scoping Report
Attachments: 2012_09_04 forU Re Fort Ord Draft Scoping Report.pdf

Gail Morton
Monterey Family Law
490 Calle Principal
Monterey, CA 93940
831 375-0100

forU *Fort Ord Rec Users*

September 4, 2012

Re: FORT ORD Draft Scoping Report

Dear EMC Planning Group Team and Fort Ord Reuse Authority Board:

This letter is written on behalf of Fort Ord Rec Users (forU), an affiliation of individuals and groups with the shared vision to preserve and enhance recreational use and the natural habitat of the former Fort Ord for the benefit of all. Our affiliate groups are named in the list accompanying this letter.

THE REASSESSMENT PROCEDURE

ForU advocated for public meetings after preparation of the draft recommendations to enable public review prior to the findings being submitted to the FORA Board for action. ForU acknowledges that the procedures were modified to enable presentation of public comment before the Board on August 29, 2012, together with an ability to submit written comment.

REASSESSMENT RECOMMENDATIONS

When written, the Base Reuse Plan anticipated substantial completion by 2014 and thus the planned sunset date for FORA. The scoping report affirms that not only did this not occur, it will not occur if at all for 40 or more years into the future. The scoping report does not adequately state implementation of the current BRP is no longer a viable choice. Nor does the report adequately address costs/funding for the extension of FORA beyond 2014; a factor not contemplated or planned for in the current BRP.

The scoping report does correctly state the public demands development on urban blight areas first. Ease of development and cost savings is insufficient justification for building on undisturbed open space, while preexisting structures and concrete pads remain to decay. It does establish the underlying growth premises served by BRP have not occurred. It does recognize the significant change in the intended purpose of the BLM lands from a regional park to a National Monument, and the need to re-evaluate of the use and designs of the contiguous properties. These are material changes which require an amended plan.

ForU incorporates by reference and reaffirms the position, arguments, and recommendations made by LandWatch Monterey County in its letter of September 3, 2012 as to the deficiencies of the report.

Very truly yours,


GAIL MORTON
Fort Ord Rec Users

forU Affiliates

Friends of the Fort Ord Warhorse (FFOW)

PO Box 1168
Marina CA 93933
(831)224-4534
fortordhistory@gmail.com
Contact: Margaret Davis

Sustainable Seaside

www.sustainablemontereycounty.org/sustainablegroups.google.com/group/sustainable-seaside
Contact: Kay Cline kcline@sbcglobal.net

Citizens for Sustainable Marina (C4SM)

www.sustainablemontereycounty.org/citizens-for-sustainable-marina.html
Contact: Luana Conley c4smarina@gmail.com

Monterey Off Road Cycling Association, a Chapter of IMBA (MORCA)

www.morcamtb.org
Contact: Gary Courtright gacourtright@sbcglobal.net
Jason Campbell camjrain@sbcglobal.net

Citizens for Sustainable Monterey County

www.sustainablemontereycounty.org
Contact: Denyse Frischmuth Frischmuth@prodigy.net

Backcountry Horsemen

www.bchcalifornia.org
Contact: Lisa Deas muledaze@yahoo.com

Santa Cruz County Horsemen's Association

Graham Hill Showground 1145 Graham Hill Road
Santa Cruz CA 95060
www.2cruzio.com
Contact: Claudia Goodman manedance@baymoon.com

US Army Veterinary Corp Historical Preservation Group

Contact: Greg Krenzelok gregkrenzelok@man.com

California Historical Artillery Society (CHAS)

warhorse.org
Contact: Ted Miljevich chaseduca@aol.com

US Cavalry Association

www.uscavalry.org
Contact: Fred Klink fredklink@comcast.net

Marina Volunteer Firefighters Association

(831) 277-1630
mvfa@sbcglobal.net



LandWatch

monterey county

Post Office Box 1876, Salinas, CA 93902

Email: LandWatch@mclw.org

Website: www.landwatch.org

Telephone: 831-759-2824

FAX: 831-759-2825

September 3, 2012

Fort Ord Reuse Authority
Attn: Chair Potter and FORA Board
920 2nd Avenue; Suite A
Marina, CA 93933

SUBJECT: COMMENTS ON FORT ORD REUSE PLAN REASSESSMENT DRAFT
SCOPING REPORT

Dear Chair Potter and Members of the Board:

LandWatch Monterey County has reviewed the Draft Scoping Report, and we have the following comments:

1. Chapter 1 of the Scoping Report describes the Fort Ord Reuse Authority's (FORA) roles and responsibilities. P. 1-8 In terms of land use and development, the description omits a discussion of FORA's responsibility as a CEQA lead agency and related responsibilities for assuring implementation of the Base Reuse Plan and its programs and policies.

CEQA Guidelines, Section 15097. Mitigation Monitoring or Reporting

(a) This section applies when a public agency has made the findings required under paragraph (1) of subdivision (a) of Section 15091 relative to an EIR ...In order to ensure that the mitigation measures and project revisions identified in the EIR or negative declaration are implemented, the public agency shall adopt a program for monitoring or reporting on the revisions which it has required in the project and the measures it has imposed to mitigate or avoid significant environmental effects. A public agency may delegate reporting or monitoring responsibilities to another public agency or to a private entity which accepts the delegation; however, until mitigation measures have been completed the lead agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the program.

(b) Where the project at issue is the adoption of a general plan, specific plan, community plan or other plan-level document (zoning, ordinance, regulation,

policy, the monitoring plan shall apply to policies and any other portion of the plan that is a mitigation measure or adopted alternative. The monitoring plan may consist of policies included in plan-level documents. The annual report on general plan status required pursuant to the Government Code is one example of a report program for adoption of a city or county general plan.

The annual reports should be included in the Appendix of the Scoping Report.

2. The Market Study finds that:

- The estimated 20 year demand for residential units in the vicinity of Fort Ord is 3,600;
- Currently nearly 4,500 un-built residential units are entitled;
- Build-out of the 4,500 units is anticipated to take 40 years;
- Job growth is paramount in the Peninsula's residential recover -- in other words, if the jobs do not appear, the 40 year build-out projection will in reality take much longer; and
- Removal of derelict Army buildings needs to be prioritized to provide a better vision of future economic development.

The Reassessment Document should recommend an update to the Base Reuse Plan (BRP) to address the over-supply of housing accommodated in the BRP and removal of urban blight.

3. We recommend that the contents of Table 8, which is 152 pages long, be summarized. Our findings indicate that of the 738 policies and programs evaluated for implementation, the Cities of Seaside and Marina and the County of Monterey have completed 21%; 21% are incomplete; 55% are ongoing and 3% fall in other categories. The County of Monterey, in particular, has fallen short of implementation requirements. Of the 259 applicable policies, only 16% have been completed, and 27% are incomplete.

The Reassessment Document should recommend that an implementation schedule for completion of the remaining programs and policies be prepared and that it be adopted by the FORA Board.

4. While many policies and programs have not been implemented by the individual cities and the County, 19 policies which are required to be implemented by all three jurisdictions are incomplete and are summarized below. Many of these policies are essential to protecting natural resources on the former Fort Ord:

Program F-1.1: Guidelines to enhance working relationship between FORA and the local homeless representatives.

Program B-2.1: Prohibit card rooms or casinos.

Program A-1.4: Minimize or eliminate land uses which may be incompatible with public lands

Program B-12 and Program C-1.5: Identify local truck routes.

Program A-1.2: Identify locations for bus facilities with funding and construction through new development.

Policy C-1: Establish an oak tree protection program to ensure conservation of existing coastal live oak woodlands in large corridors with a comprehensive open space system.

Recreation Policy G-1: Use incentives to promote development of an integrated, attractive park and open space system and Policy G2: Encourage creation of private parks and open space as part of private development.

Recreation Policy G-4: Coordinate development of park and recreation facilities.

Program C-2-1: Install interpretive signs related to biological resources.

Program E-1.1: Implementation plan for habitat management.

Program E-1-1 and Program E-2.1: Implementation of annual monitoring reports to BLM and Land Use Status Monitoring.

Program A-1.1 Establish noise criteria; Program A-1.2 Adopt noise performance standards, and Program B-1.1 Implement a program identifying developed areas adversely affected by noise.

Program A-1.2: Establish fault setback requirements.

Program C-1.3: Identify critical facilities inventory in conjunction with emergency and disaster agencies.

5. We disagree with the findings regarding Policies C-3.1 and C-3.2. The policies and findings from the Scoping Report follow:

Policy C-3.1: The City/County shall continue work with the Monterey County Water Resources Agency (MCWRA) and Monterey Peninsula Water Management District (MPWMD) to estimate the current safe yields within the context of the Salinas Valley Basin Management Plan for those portions of the former Fort Ord overlying the Salinas Valley and Seaside groundwater basins, to determine available water supplies.

Scoping Report Finding: Ongoing. The jurisdictions communicate with and support efforts to conserve water and maintain water withdrawals within the FORA allocation.

Comment: The finding does not address how the jurisdictions are working with the MCWRA and MPWMD to estimate current safe yields to determine available water supplies.

Program C-3.2: The City/County shall work with the MCWRA and MPWMD appropriate agencies to determine the extent of seawater intrusion into the Salinas Valley and Seaside groundwater basins in the context of the Salinas Valley Basin Management Plan and shall participate in developing and implementing measures to prevent further intrusion.

Scoping Report Finding: Seawater intrusion is monitored by the MCWRA. The jurisdictions enable monitoring and sharing of data as applicable.

Comment: The finding does not address how the jurisdictions are working with MCWRA and the MPWMD to determine the extent of seawater intrusion or measures to prevent further intrusion.

6. Of the 18 mitigation measures included in the FEIR for the BRP, three are incomplete. These include the failure of the City of Marina and the County to adopt and enforce a stormwater detention plan in order to increase groundwater recharge and thereby reduce potential for further seawater intrusion and augment future water supplies (see comments regarding Policies C-3.1 and C-3.2). The three jurisdictions have also not completed a comprehensive drainage plan. Design guidelines for proposed development on the bluffs have also not been completed.

The Reassessment Document should recommend that an implementation schedule for completion of the remaining programs and policies be prepared and that the schedule be adopted by the FORA Board.

7. The report identifies requirements for both general and specific consistency determinations. P. 4-171. It also identifies consistency findings made by the FORA Board. The report, however, does not evaluate the adequacy of the findings. We expected an analysis of the consistency findings, and are disappointed to find only a summary of FORA's determinations.

Given the failure of the Cities of Marina and Seaside and the County to implement many of the BRP programs, policies and mitigation measures, findings of consistency are problematic given the criteria described on pp. 171-176 of the report. For example, specific consistency criterion (a) states:

Prior to approving any development entitlements, each land use agency shall act to protect natural resources and open spaces on Fort Ord territory by including the open space and conservation policies and programs of the Reuse Plan, applicable to the land use agency, into their respective general, area, and specific plans.

As identified under 3 above, the following applicable policy has not been implemented by all three jurisdictions:

Policy C-1: Establish an oak tree protection program to ensure conservation of existing coastal live oak woodlands in large corridors with a comprehensive open space system.

8. The East Garrison/Parker Flats land use swap is described in the report. P. 4-266. The description is incomplete and should address the swap as it related to housing development at Parker Flats. The FORA and County staff reports prepared for the swap in addition to the ESCA transfer documents should be provided in the Appendix.
9. The following finding appears to have a contradiction as indicated in bold. p. 4-230.

The Bayonet and Black Horse golf course irrigation wells draw from the Seaside Groundwater Basin. However, these wells are no longer used for golf course irrigation, and the golf course is supplied with 400 acre-feet per year from Seaside's Salinas Valley Groundwater Basin allocation. Ultimately, the City of Seaside intends to use augmentation water (presumably recycled water) to irrigate the golf courses, and use the Salinas Valley Groundwater Basin water for development projects.

10. Reference is made to the lower Salinas River dam indicating it was construction in 2010. P. 4-233. This should be updated to indicate that the dam failed in 2011 and has yet to be replaced.

Thank you for the opportunity to review the document.

Sincerely,



Amy L. White
Executive Director

From: Gregory Furey [gefurey@aol.com]
Sent: Tuesday, September 04, 2012 2:06 PM
To: Darren McBain
Subject: Comments Scoping Plan
Attachments: Comments for F.doc

Comments attached (Word Doc.)

Thank you,
Greg Furey
gefurey@aim.com
(831) 384-1716

Comments for F.O.R.A. Scoping Report (Submitted via internet on 9-04-12)

Greg Furey
3095 Marina Dr. # 51
Marina, Ca. 93933

1. Independent review of the professional performance standards and behavior by the executive leadership of F.O.R.A. is needed. The F.O.R.A. bureaucracy has been slow to change and afforded no shift in dynamics when the recession occurred. It seems that it has only moved away from the original BRP once agency renewal was being pursued. The failures of progress identifiable from the original BRP reflect directly upon the existent leadership of F.O.R.A. and should be independently reviewed and evaluated. The executive officer's behavior in two publicized actions (public funds used for traffic ticket fine/traffic school and a multi-year private-use dsl internet connection) would provide cause for termination and has been a source of embarrassment to his agency and the local communities.
2. Utilize different consultants for the proposed Monterey Downs and the .O.R.A. Scoping Plan and Reassessment. The manner in which F.O.R.A. executive staff and the current board chairman have acted to ramrod through the Monterey Downs project and the consultancy awards reek of backroom dealing and special interests trumping public support and potential interest. A project such as Monterey Downs would have significant impact on the infrastructure of the entire Monterey Bay area, along with a list of other impact variables. Has an independent market surveying been conducted to determine whether or not the general public supports such a project? Monterey Downs is being pushed through F.O.R.A. at an unparalleled pace-by a board chairman with strong ties to the would-be developer and the chief executive. This project needs to slow down and further reviewed re: support and impact upon the surrounding communities.
3. Assure that there is a true paradigm shift in F.O.R.A.'s approach to a new BRP. This might be more easily achieved with a new plan, a new executive staff and a new consultant. The foundation of our national economy has changed with the loss of the "funny money" (credit derivatives) that funded so much of a highly speculative and risky real estate market of the past. As the scoping report has identified, the middle class is shrinking and more affordable housing is needed to attract and retain working families in this area. How to design and fund such projects will call for creative solutions that have been conspicuously missing to date.
4. Identify a list of economic drivers that can attract permanent jobs to the area. I have heard individuals identify eco-tourism, education (relative to CSUMB's continued growth), and technology. These should be quantified, supported by economic research, and supported via a revised BRP.
5. Replace UC MBEST with an experienced job development organization-as was originally intended. CSUMB now has an entrepreneurship program that could be utilized for input. New business, new jobs, and new revenue will spawn support for new housing-if appropriately priced.

6. Incorporate new BRP goals that include identified marketing and economic drivers affiliated with the newly established Fort Ord National Monument. There is no reason that the Veteran's Cemetery could not be affiliated with a first tier military museum, Special Forces training displays (what about the history of the urban warfare site?), Calvary history, etc. It is troubling that the cemetery has become so desperately hitched to a horse racing track. This reflects in a negative manner upon current F.O.R.A. executive and board leadership.
7. Assure that there is open linkage to the coastline from the National Monument via trails.
8. Reopen to the public all trails in areas deemed free and clear of explosive threat, i.e., that have been proven to pose no threat to the public (by continual use over the past ten years). Remove trailhead signs restricting trails which have been freely utilized by the public (until the current Monterey Downs project appeared).
9. Hire a first rate economic development consultant to recommend an intelligent and creative path forward in developing new jobs and businesses tied to the best long term interests of this unique central coast area.
10. Release any claim to the Preston Park property. It seems wholly ironic that the stated uses of much of the monies F.O.R.A. claims entitlement to is intended for use on project work which will almost certainly bypass Marina, the city to whom the Preston Park property should rightfully belong. To take out a 19 million dollar loan and to subsequently offer less than 20 million dollars (vs. an estimated 60 million assessed value) to the city to which it should rightfully be transferred...then to utilize much of those wrongfully acquired monies to fund infrastructure improvements which will not assist in the city of Marina's economic recovery from base closure seems criminal.
11. Shrink the size of the voting members on the F.O.R.A. board to reflect the jurisdictions and organizations which were most directly affected economically by the closure of Ft. Ord and/or have evolved from it: Monterey County, Del Rey Oaks, Seaside, Marina, CSUMB, et al. Over the period of time since F.O.R.A. was begun, executive staff has been ineffective at uniting the oversized board towards common purposes, often witnessing petty disputes, acrimony, etc. While that may serve to perpetuate an ineffective bureaucratic organization, it has done little to "move the train forward" re: job development, housing, etc. All of these are far more critical to the health of the affected jurisdictions than to the interests of F.O.R.A. The F.O.R.A. bureaucracy has had deplorable reflex reaction times to the economic downturn and has seemed to perpetuate dissension amongst its' numerous members-rather than unite and foster progress.
12. Change F.O.R.A board meetings to a time and day that is more accessible to the general public. Assure transparency by conducting a full F.O.R.A. audit-in order to restore lost public confidence. Assure that all board meetings are recorded and accessible via local cable access and/or internet.

September 4, 2012



Fort Ord Authority (FORA) Board of Directors
920 2nd Avenue, Suite A
Marina, CA 93955

Dear FORA Board of Directors,

On behalf of Sustainable Seaside, a group of local residents who are very concerned about working with our community to meet the challenges of climate change and depleting resources, I am writing to you regarding the Draft Scoping Report released on August 15.

We along with many others advocate for the building on blighted lands at Fort Ord prior to development on open space. This will improve the perception of the lands for visitors and developers, will help CSUMB to attract students to their campus and makes logical sense at this time when all over the world we are concerned with the loss of forests. As pointed out numerous times in public comments, both at meetings and in written form, the public is consistently demanding that blighted lands be addressed first.

In order to do this, FORA will need to look at other methods for financing blight removal. This is the perfect time to re-examine this process. It has been noted that other military bases have managed to address urban blight in the process of repurposing their land.

The creation of the Fort Ord National Monument (FONM) has altered conditions at Fort Ord and placed these lands on the national stage. It is important that time be taken to address this change and to address the issue of access from Marina and Seaside. These lands, tied with the Dunes State Park and the Youth Camp have the potential to open our area to much greater eco-tourism and to bring great numbers of outdoor enthusiasts to our area. Thus local access points, a welcome center and amenities could greatly enhance the economies of both Marina and Seaside and create a world class destination.

CSUMB has brought much growth and life to the Fort Ord lands and will continue to do so. It is important that the concerns of the college be addressed and that development adjacent to the university be compatible with the campus.

The scoping report and reassessment of the base reuse plan offer an opportunity to become current with many changes which have occurred since 1994. It is important that housing needs and job creation be reevaluated with consideration to numbers of homes in Monterey County permitted and not built, as well as the amount of commercial spaces currently available. Now is the time for FORA to develop a strong marketing plan which will include CSUMB and FONM as focal points.

We urge you to take this opportunity to consider very carefully the Scoping Report and public comments and to reconsider the economic and material changes which have occurred in the last 18 years, as well as the acres of blight which are still awaiting development. Take into account that the open space lands are a most unusual treasure, rich with natural habitat and trails which have been attracting visitors for twenty years. Sam Farr pointed out at the August 10 FORA meeting: The status of the National Monument adds a fourth leg to the stool ("education, economy, environment and esthetics"). This is a reminder that the beauty of this area is an outstanding quality of Monterey County. Open space is a treasure to be protected for all, while development needs to go forward, as water becomes available, on the urban footprint already established.

Sincerely,

Kay Cline
Sustainable Seaside
1614 Kenneth Street
Seaside, CA 93955



FORT ORD REUSE AUTHORITY

920 2nd Avenue, Suite A, Marina, CA 93933
Phone: (831) 883-3672 – Fax: (831) 883-3675
Website: www.fora.org

FORT ORD REUSE PLAN REASSESSMENT

COMMENT FORM

9 - 4 2012

SCOPING REPORT

FORA welcomes public input on the Scoping Report, as it relates to the 1997 Fort Ord Base Reuse Plan reassessment process. The 1997 Base Reuse Plan was created as a 40-60 year plan. The overall goal of the reassessment process is to explore whether objectives and policies in the Base Reuse Plan should be updated to better address current conditions and meet the community's future needs. A Reassessment Report will be prepared for this purpose. The Reassessment Report will include a range of options that the FORA Board of Directors may wish to consider for possible future action related to the Base Reuse Plan.

The Scoping Report includes a summary of information collected about the implementation of the Base Reuse Plan since it was approved 15 years ago. The Scoping Report also includes an analysis of current and future economic and market conditions and trends. The Scoping Report will be used as a basis for identifying possible options for consideration that may be included in the Reassessment Report for future consideration or action by the FORA Board.

Comments submitted by 5:00 PM on September 4, 2012, will be included in the Final Scoping Report scheduled for release on September 7, 2012. Comments received after this deadline will be accepted but will not be included in the Final Scoping Report document and may not be included in the Board packet for the FORA Board meeting on September 14, at which the Board will consider accepting the Scoping Report. Comments can also be presented on September 14 at the FORA Board meeting, but those comments will not be included in the Final Scoping Report document.

Commenter Name:

LeVonne Stone

Address (Optional):

Email (Optional):

lejustice@mbay.net

FORA cannot directly respond to each and every comment that is submitted; however, all comments will be reviewed.

Comments can be submitted to FORA by email: plan@fora.org; FAX: 831-883-3675; or mail to: FORA, 920 2nd Avenue, Suite A, Marina CA 93933. For more information about FORA or the Base Reuse Plan, visit the FORA website at www.fora.org or contact Darren McBain at FORA, (831) 883-3672.

Space for written comments is provided on the reverse side.



SIERRA CLUB
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Fort Ord Environmental Justice Network

LeVonne Stone, Executive Director

P.O. Box 361 Marina, CA 93933

(831) 582-0803 • Email: ejjustice@mbay.net • Website: www.foejn.org

Page 1 of 2

Sept. 04, 2012

Subject: Fort Ord Reuse Plan Reassessment

Thank you for the opportunity to continue to provide public comments on the Fort Ord Reuse Plan Assessment.

Monterey County is home to one of the largest and most complex contaminated sites in the nation, the former Fort Ord. The Fort Ord Environmental Justice Network was formed in 1995 to give voice to those impacted by the clean up and re-use process of Fort Ord, after it was closed under the Base Re-alignment and Closure program in 1994.

Since its inception, the Fort Ord Environmental Justice Network has advocated for the participation of disenfranchised communities in the activities and decisions made regarding the Military Superfund Base cleanup and Re-Use Program. We have stated repeatedly that the Original Community Base Re-Use plan should be upheld. The plan allowed the local, impacted community residents and members to participate in the decision making process that would allow for creation of jobs lost during the Fort Ord Base Closure.

Outreach to local low-income and disenfranchised community members and organizations should not be neglected. The Environmental Justice Resolution SB12898 was created by President Clinton to avoid the kind of encroachment that we are experiencing at this time in our history. The accomplishment of Environmental Justice should bring balance in the distribution of resources, involvement and participation, funding and a real show of care for those who are constantly left out of the decision making processes. The Fort Ord Environmental Justice Network also strives to involve local residents, as well as low-income residents in reuse plans, and economic development recovery efforts.

We are also involved in the clean-up of the Fort Ord Superfund (CERCLA) site, which is an Army post that has been in existence since 1917) in the Monterey Peninsula of California, was decommissioned in 1991. This former Army base, like many military installations across the country, houses environmentally contaminated sites, due to past environmental practices of the Department of Defense (DOD). The Clean-up of this Base should continue, (with updated methods that do not compromise the health of our communities. Burning is not the right solution. Trading our health for jobs is not an option, we need affordable housing, our health and jobs.

The U.S. Environmental Protection Agency (US EPA) has listed Fort Ord on the National Priorities List (NPL), as one of the most contaminated Superfund sites in the Nation.

We applaud your prioritization of this critical process that must protect and restore the quality of life for those who have been severely impacted, disenfranchised, both economically and exposed to the toxics that have been and still are compromising our communities well-being.



Fort Ord Environmental Justice Network

LeVonne Stone, Executive Director

P.O. Box 361 Marina, CA 93933

(831) 582-0803 • Email: ejjustice@mbay.net • Website: www.foejn.org

Page 2 of 2

The Fort Ord Environmental Justice Network petitioned the U.S. EPA for the Fort Ord Superfund Job Training Initiative which is a job readiness program that provides opportunity to underserved citizens living in communities affected by Superfund sites. The EPA's goal is to help the community create job opportunities and partnerships that will remain after the site's cleanup has been completed. The Job Training Initiative is sponsored by EPA Headquarters out of Washington, D.C. The program Director will travel to the Monterey County Peninsula for this meeting with you and other community leaders and Pastors who will be involved in the referral and selection processes.

The Fort Ord Job Training Initiative (FOJTI) is a job-training program that will provide career development opportunities for those living on Fort Ord, Seaside, Marina, Salinas and the Monterey Peninsula.

The goal of the program is to provide training of skills that enable participants to seek a variety of local employment opportunities in site Environmental remediation and redevelopment.

We need more vocational training that will ensure employment for local residents that have been severely impacted by the lack of implementation of the original Community Re-use plan.

Sincerely,

A handwritten signature in black ink, appearing to read "LeVonne Stone". The signature is written in a cursive, flowing style.

LeVonne Stone, Executive Director
Fort Ord Environmental Justice Network

LAW OFFICES OF
MICHAEL W. STAMP

Michael W. Stamp
Molly Erickson
Olga Mikheeva

479 Pacific Street, Suite One
Monterey, California 93940

Telephone (831) 373-1214
Facsimile (831) 373-0242

September 4, 2012

Dave Potter, Chair
Members of the Board of Directors
Fort Ord Reuse Authority
920 2nd Ave., Suite A
Marina, CA 93933

Subject: Base Reuse Plan Reassessment – draft scoping report

Dear Chair Potter and Members of the Board of Directors:

This office represents Keep Fort Ord Wild. We make the following comments on the Base Reuse Plan Reassessment draft scoping report.

The deadline for comments was not adequately publicized. It did not appear on the FORA website, either the home page or the Base Reuse Plan reassessment page. We suggest that you accept comments for inclusion in the final report under September 15, 2012, and that you publicize that date for responses.

The Base Reuse Plan Reassessment draft scoping report ("report") is significantly flawed in numerous significant and material ways. We identify some of the problems in this letter. We provide examples primarily from chapter 4.

Keep Fort Ord Wild has repeatedly raised the issue of the conflict of interest of EMC, the report preparers. KFOR has filed litigation against FORA on that issue. The conflict arises from the work by EMC for FORA in preparing the report, and the concurrent work by EMC as an extension of Seaside staff in processing the Monterey Downs project, a project that is desired by Seaside. The report contains many significant examples of how EMC's conflict appears to be affecting the report. As one example, the report's discussion of the Parker Flats/East Garrison land use modifications (called "land use swap") omits an adequate discussion of the details of the "swap." The "swap" appears to significantly prohibit parts of the Monterey Downs project as proposed. As another example, the report's Figure 7.2 "a proposed "draft concept" for land use, would enable the Monterey Downs project. The problem is that the conflict of interest is fundamental and the entire report is infected with the divided loyalties.

To be useful, a reassessment should take a broader perspective than the cramped and narrow approach of the draft scoping report. The report fails to adequately address the inadequate aspects of the Base Reuse Plan. These inadequacies were present in some cases when the plan was adopted, and subsequent

actions and research have rendered it further inadequate. As one example of how the 1997 plan was inadequate when it was adopted, we point to the plan's failure to mention or reflect the officially protected Endemic Plant Preservation Areas for Fort Ord, California, as shown on the Army map and as reflected in binding Army agreements, both dating from at least ten years' prior to the Base Reuse Plan. As an example of how the plan has become increasingly inadequate, we point to the designation of the Fort Ord National Monument, the increasing use and recognition of Fort Ord as an invaluable recreational destination, the dramatically changed economy and all the implications of that changed economy, and the greatly expanded knowledge of wildlife corridors and endangered species at Fort Ord, including the American badger, about which extensive research on Fort Ord has been done.

At page 4-176, the report refers to "procedures" that "FORA staff has established" for conducting consistency determinations. The report fails to describe adequately those procedures. The procedures should be specifically described or attached in an addendum.

The process to conduct consistency determinations is flawed. As one example, the County of Monterey adopted a new General Plan in October 2010, but as of September 2012, that new General Plan has not been brought to FORA for a consistency determination. As another example, the City of Monterey adopted a new general plan in February 2011, but as of September 2012, that plan has not been brought to FORA for a consistency determination. As another example, the Parker Flats/East Garrison land use swap from 2007 has not yet been brought to FORA for a consistency determination, even by FORA, despite the fact that FORA signed the land swap documents. To the extent that the 2007 swap required a change to the Base Reuse Plan, that step also has not been taken.

The report fails to discuss the "degree of interpretation" that the report claims is "required in determining consistency." The report also fails to discuss what criteria are used by FORA staff to determine an "equivalency of uses and intensities." (See p. 4-176.) These are just a few examples of how this apparently staff-created process affects the consistency determination by FORA, without adequate disclosure to the public of the process and its weaknesses. Without attribution to a source, the report identifies only two issues that must be met for a plan to be consistent: housing units and water supply. Also without attribution, the report states that "if these two constraints are met, then positioning of land uses can be considered flexible provided cumulative effects on the BRP are unchanged." (See p. 4-177.)

Here, and throughout the report, the report fails to identify or cite to the documents on which the report is relying in order to make these claims. The report should provide the information, so the public can go to the source documents and hold the report preparers accountable. It is an unfortunate practice of public agency staff to paraphrase plans and regulations, and to omit citations to source documents. That

strategy prevents the public and decision makers from reviewing the actual language of the plans, regulations and codes. The report preparer should not hide this information.

The report's claims about consistency requiring only "housing units and water supply" (p. 4-177) is alarming, if true. The consistency analysis should be more complex than that, as shown by Master Resolution section 8.02.010(a). The report oversimplifies, and by doing so, misleads.

The report gives short shrift – less than five pages – to the discussion of water supply. The report fails to disclose the serious problems with water at Fort Ord. The report states, without citation, that there are "maximum allowed withdrawals" from the Salinas Valley Groundwater Basin of 6,600 AFY. No entity has "allowed" those withdrawals. The so-called "Army allocation" did not transfer valid water rights. The Army did not have rights to award.

The Salinas Valley Groundwater Basin is overdrafted, and the basin is not adjudicated. The conditions to the Army allocation are not being met. The report should be rewritten to reflect these realities, and to correct the many years of FORA's inaccuracy in hiding the true water supply problems at Fort Ord.

Seawater intrusion is worsening. According to the 2011 data released by the Monterey County Water Resources Agency, in both the 180-foot and 400-foot aquifers more acreage has been contaminated by seawater in the last two years. The issue is not solely the "rate" of seawater intrusion, as the report implies (see, e.g., p. 4-232), but is the fact of seawater intrusion, at all.

The effects of the Salinas Valley Water Project on seawater intrusion will be unknown for at least twenty years, according to the Monterey County Water Resources Agency. At best, according to the SVWP EIR, if all the assumptions about the SVWP are met, the SVWP might halt seawater intrusion, but because the assumptions are not being met, the SVWP cannot meet its projected goal. The SVWP EIR admits that the SVWP can only be effective after all components, including the rubber dam, are operating. The draft scoping report failed to mention that EIR statement, or the fact that the SVWP rubber dam was not operational in 2012, so it could not have an effect. The SVWP does not provide for the continued future availability of up to 6,600 AFY at Fort Ord, contrary to the claims in the report (p. 4-233).

Fort Ord is getting its water from the overdrafted deep aquifers approximately 800 to 1400 feet below ground. These water sources are unsustainable, because they are not being recharged. The draft scoping report fails to investigate or even disclose this serious problem. Existing development relies on those unsustainable sources. New development at Fort Ord also would rely on these unsustainable water sources. The report fails to discuss adequately the many problems with that approach.

The report should state who decided that "the principal purpose of this review of past consistency determinations is to identify land use changes to the BRP Land Use Concept map" (p. 4-177). As discussed elsewhere in this letter, that focus is much too narrow, and ignores significant and material issues and problems with the BRP and the FORA staff-created procedures for processing consistency determinations.

The report's discussion of hazardous materials cleanup is inadequate. As one example, the report does not clearly identify which properties have restrictions on residential use (see, e.g., p. 4-211 et seq.). As another example, the report's discussion and presentation of groundwater contamination is inconsistent with the groundwater protection zone maps maintained by the County and the Army.

To the extent that the report relies on Caltrans traffic data (see, e.g., Table 17), the reliance is misplaced and the data is unreliable. Caltrans recently admitted to our Office that Caltrans does not actually count the traffic at most locations, including Highway 68 and other Monterey County roads. Instead, Caltrans mostly extrapolates based on past readings. Actual traffic data for many of the roads is available. For example, there is extensive data available from various traffic studies prepared for the County. The report should seek that data and use it, instead of the unreliable Caltrans estimates.

The report focuses on program-level mitigations (see 4-157), without explaining why the report omits the other mitigations, and without providing a valid basis for the omissions. All mitigations should be listed and analyzed for compliance.

All source documents should be clearly referenced, and specific pages should be identified each time the report makes a reference to the source document.

Many of the report's figures and charts are missing significant information, without explanation. As one example, in Figure 6, the County land use is not included.

As a whole, the report is challenging to read and understand. The report's format is not friendly to users. Here are some examples.

- The tables of contents have no page numbers by which to identify them.
- The text on the tables of contents is not helpful, in many instances. For example, the Chapter 4 table of contents includes numerous entries for "mitigation measure" but nothing to distinguish one entry from another.
- The lengthy report is formatted in many colors, which makes it very expensive and challenging for the public to print.

- The colored fill on tables are unnecessary, and makes it difficult to read the text on both the online and printed versions.
- The very pale page numbers at the bottom of the page are almost illegible, and vanish entirely when copied.
- Because the report is not available for purchase, according to FORA, the public has no choice but to print it.
- The report should have only black and white text; maps can be in color.
- The report should be available for purchase.

We ask that you consider these comments and act upon them. Thank you.

Very truly yours,

LAW OFFICES OF MICHAEL W. STAMP



Molly Erickson

The Highway 68 Coalition
52 Corral de Tierra
Corral de Tierra, CA 93908
(831) 484-6659

Fort Ord Reuse Authority
920 2nd Ave., Ste. A
Marina, CA 93933
Via Fax: 831-883-3675

Re: Base Reuse Plan Reassessment Draft Scoping Report 2012

September 4, 2012

Dear FOR A Board Members and staff,

This letter is in response to your stated request for comments by September 4, 2012.

The Highway 68 Coalition would like to call your attention to the Fort Ord National Monument aspects of your Draft Scoping Report. A few examples from the report are the following (in bold type):

Chapter 3. Market Study Summary

Maximize the potential impact of the Fort Ord National Monument designation. To be successful, the backlands of Fort Ord need to be attractive, safe, and accessible to a broad spectrum of visitors. Paths need to be improved to accommodate bicycle, pedestrian, and equestrian uses without conflict, and visitor amenities should be constructed according to a full master plan for the Monument, which will be prepared by Federal agencies as time and resources permit. Linkages to key projects and other regional attractions will be an important element of future planning efforts. the region and to reduce traffic moving through the central CSUMB campus. Nevertheless, the placement and timing of this and other major improvements should continue to be studied to ensure compatibility with future opportunities brought about by the National Monument designation and the overall vision for base reuse.

Fort Ord Prospects and Opportunities

18. **The National Monument offers an opportunity to distinguish Fort Ord, providing a compelling additional regional destination and supporting base recovery by providing additional amenity value for well-conceived growth and development. Tourism remains a strong sector for the regional economy showing annualized spending growth exceeding 3 percent per annum. The National Monument designation's effect, if accompanied by a compelling and thoughtful implementation strategy fully activating the base and providing access to a wide cross section of the public, can help extend tourism and related spending to the communities encompassed by Fort Ord. It is important to note, however, that the while the leisure and hospitality industry is a critical element of the regional economy, it offers jobs that are often low paying. As its growth will not solve issues of economic and social bifurcation, expansion of this industry is one element of potential economic growth that must be augmented through development of other sectors.**

Page 2

Page 4-268

National Monument Establishment

In April 2012, President Obama declared 14,651 acres of land at Fort Ord a national monument under the powers granted by the Antiquities Act of 1906. The land designated as a national monument is partly under the jurisdiction of the Bureau of Land Management, and the remaining 7,446 acres are still under the control of the U.S. Army, but intended for transfer to the Bureau of Land Management once clean-up activities are complete. The change in status to a national monument does not have a direct physical or land use effect, but does recognize the site's importance as a public resource and will likely result in increasing levels of recreational tourism as the Federal government develops site access and facilities over time.

The Highway 68 Coalition has several concerns. We support the National Monument status. However, because it may likely cause increases in tourism and traffic, it requires a comprehensive overall traffic and public access plan that is both consistent with the FOR A Reuse Plan and existing realities on Fort Ord's surrounding roadways, specifically State Highway 68.

The Highway 68 Coalition has been corresponding with BLM. BLM is proposing many gates to the National Monument, however the one they call Badger Hills adjacent to two-lane Highway 68 near the Toro Café has numerous problems. BLM states they are planning to process this with NEPA. Meanwhile FOR A is processing an overall base reuse plan under CEQA. The Highway 68 Coalition is concerned this Badger Hills access gate is being processed individually, outside of an overall comprehensive Base Reuse Plan, the Plan that is now being reassessed. It is piece-mealing. There is the potential for significant impacts. BLM and/or FOR A need an E.I.S. should they wish to individually process National Monument Access gates exclusive of an overall comprehensive Base Reuse Plan.

Some of the concerns that the Fort Ord Base Reuse Scoping Report needs to identify regarding the BLM/National Monument proposed parking lot/access at Badger Hills are:

- 1) Will the tree removal increase visibility of this proposed new parking lot from Scenic Highway 68? (The first Highway to be designated as such in California.)
- 2) Won't this paved parking lot be growth inducing and possibly require a full-time ranger to be stationed there?
- 3) The new proposed parking lot with bathroom in this rural area could be an attractive nuisance that would draw teens for parties, similar to the attraction the 7-11 at the Toro Park Shopping Center has had for years.
- 4) The traffic Level of Service report (from CA BLM 68(1) Fort Ord SR 68 Traffic impact Analysis) is wrong. It says mainline movements will be moving at LOS A or B and existing road turn movements will operate at LOS D. This doesn't make sense. The Transportation Agency for Monterey County determined the LOS on Highway 68 was "F" in 1997. Every Highway 68 segment from nearby Torero to

Page 3

Highway 1 is LOS F.

5) The Toro Café stretch of Highway 68 is dangerous enough now. It was the site of five teenagers all killed in a Camaro a few years back, and a family hit head-on in their Suburban. Most recently it was a girl in a Porsche who was reported to be driving drunk. Widening the median on the highway here and encouraging more turn movements nearby would increase the danger. Turn movements that include trucks towing horse trailers are especially worrisome.

6) It is called the Badger Hills Trail head project. Is this area a wildlife corridor? Do badgers cross Highway 68 at night here? When will the Fort Ord HCP be completed?

7) Another growth inducing aspect to this proposed project is the access to Fort Ord Roads now belonging to BLM that this may allow. As of now there is a narrow entrance to access trails next to this dirt parking area owned by CalTrans. However, nearby there is Guidotti Gate on Highway 68. Guidotti Road connects to Skyline Road at the top and goes to Laguna Seca Raceway. El Toro Creek Road is at the bottom near Guidotti Gate of Highway 68. With no gate and no ranger on duty, how would BLM prevent vehicles, including motorcycles, from accessing these internal roads?

8) Potential for Ferrini Ranch access road across from this Badger Hills project entrance? With a signal light in the future? Reference Ferrini Ranch DEIR.

9) Finally there is conflict with the adopted Official Plan Lines (OPL) for both the Coral de Tierra Bypass adopted in 1977 and the Fort Ord Bypass, also known as the South West Alternative adopted in 1997 with the Fort Ord Reuse Plan. CalTrans owns the current dirt area used for parking because it is the entrance to, and jumping off point for both Bypass Plans. The proposed location of the parking lots and bathrooms conflict with the adopted Plan Lines. There are two official Bypass Plan Lines that conflict with the Badger Hills Trailhead parking lot project.

BLM has apparently hired a traffic consulting company from Colorado to analyze traffic issues at Badger Hills. This brings up another issue in that the FOR A Base Reuse Draft Reassessment lists a reference as Hexagon Traffic Consultants. The Highway 68 Coalition asks that California registered and licensed Traffic Engineers be utilized in all the traffic and circulation aspects of the Reassessment.

Thank you for the opportunity to comment.

Sincerely,



Mike Weaver

Chair, The Highway 68 Coalition

Michael Groves

From: Jonathan Garcia [Jonathan@fora.org]
Sent: Wednesday, September 05, 2012 10:52 AM
To: Darren McBain
Subject: FW: Scoping Report on Fort Ord Base ReUse
Attachments: Fort Ord Reuse Authority PK.pages; ATT00001.htm

Ditto.

From: Paula Koepsel [<mailto:pkoepsel@mac.com>]
Sent: Tuesday, September 04, 2012 5:01 PM
To: Jonathan Garcia
Subject: Scoping Report on Fort Ord Base ReUse

Fort Ord Reuse Authority
920 2nd Street, Suite A
Marina, California 93933

Re: Scoping Report on Fort Ord Base Reuse Assessment

To Whom It May Concern:

After reviewing the Scoping Report, I see three items that I want to call to your attention.

1. Figure 7.2, Page 4-195 of the Report: There is a notation of "EQ" for Equestrian Center Site Opportunity located near the East Garrison project. Please note that in 2002, this opportunity site was moved from East Garrison to Parker Flats. For accuracy purposes the map needs to be updated to reflect that.
2. Page 4-266 of the Report: This section discusses the East Garrison-Parker Flats Land Swap, but does not discuss the fact that an equestrian cross-country course was permitted within the Oak Oval/Habitat Management Parcel as a part of the land swap. The cross-country course allows for a course both in and out of the Oak Oval, extending into the rest of the County's FORHA lands if needed. It also permits permanent obstacles for the course and course maintenance. This has been omitted from the report and should be corrected and included.
3. May I call to your attention that on Page 3-3 of the Report, it states that it is expected to take another 40 years to complete build-out of former Fort Ord and that there is a 20-year projected supply of housing for residences, commercial usage and jobs. I would like to note that these projections only take into account the current job market of the Monterey Peninsula and do not factor in developments which include job creation, which leads to increased demand for housing and commercial businesses.

Please take into consideration, If projects such as the Monterey Horse Park and Monterey Downs are approved, more than 3,000 direct and 2,000 indirect jobs will be created. This is in addition to construction jobs, and the build-out and demand will thus greatly shorten the timeframe stated in the report.

Thank you,

Vickie Bermea

From: Suzy Worcester [suzanne.worcester@gmail.com]
Sent: Tuesday, September 04, 2012 4:53 PM
To: Darren McBain
Subject: feedback on draft scoping report

Sept. 4, 2012

Dear FORA Board Members and Staff,

Thank you for including public feedback from the Draft Scoping Report (DSR) on the Final Scoping Report (FSR). The DSR makes the case that the economic situation has changed substantially since the original Base Reuse Plan (BRP) was written. Both the economic situation and the designation of the new Fort Ord National Monument are key drivers that demand a revision of the BRP to incorporate these new realities. These realities include the following:

1. In chapter 3 "Market Study", it clearly states that the number of residential units needed in the community based on economic demand have been covered by the housing units already entitled on Fort Ord. This means that approving additional housing beyond that which is entitled is inconsistent with jobs:housing balance and will put downward pressure on home prices in local cities.
2. There was a substantial amount of written public comment provided to FORA in June requesting that future development should remove blighted areas (areas with current derelict buildings and large concrete parking lots) prior to development on existing open space lands. Nearly 180 people in the community wrote comments to this effect. This is clearly a very important component for the public and needs to be clearly reflected as a future direction for FORA in the Final Scoping Report.
3. CSUMB students, staff and faculty are now the major constituents on Fort Ord in terms of economic potential. Future developments need to be consistent with the student-friendly and academic character of the campus in order to allow this economic engine to continue to bring money into our local communities. In addition, CSUMB should have voting rights on the board given its important and central role on Fort Ord.
4. Given the new economic reality set forth in ch. 3 "Market Study", the new National Monument, and the size of CSUMB, it is important that FORA do a market plan of how to best use these resources to redevelop the blighted areas on Fort Ord. Ways to finance this redevelopment and to help Marina and Seaside redevelop the blighted (already developed areas) of Fort Ord is an appropriate use of FORA's resources in the public's eye. The public expects FORA to be helping to make the redevelopment happen on blighted lands.
5. Many comments have been made in the media and elsewhere that new trails in open space are expensive and that new developments on open space are required to fund these projects. It is important that the FSR include an analysis using aerial photos of pre-existing trails vs. current trails. Aerial photos clearly show that the trails the public uses have been around since before FORA took over management of Fort Ord. Thus the argument that this is an expensive job doesn't make sense, given the "infrastructure" (trails) already exists. A realistic assessment of the BRP in 1997 vs. the current Fort Ord lands that includes the trail network that has been existent for over a decade should be included in the FSR.
6. A redesigned BRP that matches the economic reality in the Market Study of the DSR will automatically use less water and thus bring the BRP more in line with the availability of water in the region. The water issue has become even more difficult (and uncertain) relative to when the BRP was written and a revised BRP needs to incorporate the new, lower expectations for available water for projects.

7. 7. There has been substantial discussion in the media around Veteran's needs and connecting with Fort Ord military history. So far developments on Fort Ord have largely destroyed the history here on Fort Ord. FORA should set up policies that help to memorialize fallen soldiers and the many soldiers who trained at this base. This should include preserving some of the existing structures and training grounds as reminder of our history and the sacrifices of the men and women who served our country at Fort Ord. Much of this can be done without removing additional open space. Indeed much is consistent with new open space uses.

8. 8. A new marketing plan needs to consider the tremendous economic potential from recreation. Several studies have been done in the West that show that recreation and open space generates billions of dollars of revenue for communities. Supervisor Parker has some of these studies and I'm sure will be willing to share them with the rest of the Board and the Staff. These dispersed recreational opportunities bring important revenue to our communities without the huge traffic jams associated with large events (such as those at Laguna Seca, Pebble Beach, etc.). FORA can propose developments that better fit within the area infrastructure without having new, large venue events that clog highway 1 and highway 156. Any projects need to consider regional infrastructure as well as local infrastructure.

9. 9. Finally, putting together mixed groups of people with different views with paid facilitators is an excellent way to help move the revised BRP forward. This was suggested at the public meeting and is excellent advise to the Board and Staff.

1010. The original BRP on pgs. 4-26 specifically does not allow for onsite gambling operations (as opposed to offsite gambling which is more in line with what happens at the Fairgrounds). The revised BRP should be consistent with that and the Board should honor this.

Thank you for including the publics concerns into the revision of the DSR.

Sincerely,

Suzanne Worcester

17 year Fort Ord resident

(sent via e-mail)

From: Vicki Nakamura [VNAKAMURA@mpc.edu]
Sent: Tuesday, September 04, 2012 6:33 PM
To: Darren McBain
Subject: Fort Ord Base Reuse Plan Reassessment Scoping Report
Attachments: Fort Ord Reuse Plan Scoping Report Comment Letter - VN.pdf

Please see attached comment letter.

Vicki Nakamura
Assistant to the President
Monterey Peninsula College
980 Fremont Street
Monterey, CA 93940
831-646-4114



September 4, 2012

Fort Ord Reuse Authority
920 2nd Avenue, Suite A
Marina, CA 93933

RE: Fort Ord Reuse Plan Reassessment Scoping Report

The Scoping Report for the Fort Ord Base Reuse Plan reassessment was recently released by the Fort Ord Reuse Authority. I am writing to provide comments regarding Chapter 4, Reuse Plan Implementation.

On page 4-41, regarding Program C-1.2 and open space designation, the notes state, "Open space will be provided within Eucalyptus Road area on land under the control of Monterey Peninsula College. No development plans are approved for Polygon 19a." This statement needs clarification – I believe Polygon 19a includes the College's parcel, E19a.5, which is planned for development as the site of an emergency vehicles operations course and fire tower training facility. Monterey County and the Fort Ord Reuse Authority are signatories to property exchange agreements in 2002 and 2003 with the College that approves development of this parcel for this purpose.

Later, on page 4-52, regarding Program A-1.4, and the minimization of impacts of proposed land uses which may be incompatible with public lands, such as ... siting of the Monterey Peninsula College's Military Operation Urban Terrain (MOUT) law enforcement training program in the BLM Management/Recreation Planning Area. The notes state, "The County has not taken actions to minimize potential impacts resulting from ... the MPC MOUT facility." Again, Monterey County, the Fort Ord Reuse Authority, and the Bureau of Land Management (BLM) are signatories to a 2005 agreement with the College where BLM agreed to withdraw its claim to the MOUT facility in favor of MPC's ownership. The parties all acknowledged the MOUT facility would continue to be operated by MPC as a public safety and tactical training facility within BLM's area. The recent designation of the BLM's Fort Ord acreage as a national monument does not extend to the MOUT facility and thus, should not affect continued use for public safety training. The agreement also addresses coordination between MPC and BLM to address concerns with operation of the MOUT facility.

I offer these clarifications because the College agreed to relocate its public safety training facilities to the Parker Flats area and MOUT facility to resolve a longstanding (ten years!)

land use conflict with the County and FORA over the East Garrison. Reaching agreement was not an easy process; but the College agreed to the exchange to ensure the future development of the training facilities at Parker Flats and the MOUT. The facilities are essential to MPC's public safety programs; the lack of adequate training facilities for emergency vehicle operations, weapons handling, and firefighting have created a number of logistical challenges for these programs.

The College has been providing training for law enforcement, fire technology, and emergency responders for numerous years. MPC graduates are employed at local police and fire agencies in the area and throughout the state of California. The facilities at Parker Flats and the MOUT are necessary to continue meeting training requirements and serve local public safety needs.

MPC looks forward to continuing its successful role in the reuse of the former Fort Ord. The public safety training facilities in Parker Flats and at the MOUT facility will be an educational resource for the region and have positive economic development impacts for the area. Thank you for the opportunity to provide comment on the Scoping Report.

Sincerely,



Vicki Nakamura
Assistant to the President

From: Vicki Pearse [vpearse@gmail.com]
Sent: Tuesday, September 04, 2012 11:54 AM
To: Darren McBain; ingramgp@ix.netcom.com; Lena Spilman
Subject: Base Reuse Plan Draft Scoping Report
Attachments: FORA Sept2012.doc

September 4, 2012

To: Fort Ord Reuse Authority

920 2nd Ave., Suite A

Marina, CA 93933

I am writing to ask FORA most urgently to re-evaluate the Base Reuse Plan, and to revise it thoroughly and conscientiously. The economic analysis in your own Draft Scoping Report shows the Plan to be severely off-track. It must be updated to reflect realistic current prospects of the Peninsula and the County and to provide for future needs and aspirations.

These have changed fundamentally since the writing of the Base Reuse Plan in 1997. The expansive projections of that Plan have proved inaccurate: no demand for additional housing and retail commercial space exists. Indeed, these kinds of developments are to a large extent in over-supply, as shown by the number of unsold dwellings and empty storefronts. Anticipated population increases have not materialized.

Forcing “growth” in stale economic terms can only accelerate the crises in water supply and traffic congestion that our region is already facing and can never provide a stable base of employment.

Most unfortunate, being locked into an outdated vision will prevent us from realizing the abundant new opportunities we do possess – in the creation of the National Monument at Fort Ord. It is widely demonstrated that National Monuments are magnets for tourism, a force that is further strengthened by the scenic beauty of the entire Monterey Bay area and Big Sur Coast.

This rare concentration of special assets provides economic values that cannot be matched. Destroying them forever by random building of routine developments that could be plunked down anywhere would be to throw away an irreplaceable heritage and the best hopes for generations to come.

Thoughtful, responsible, forward-looking land-use planning by FORA is urgently needed to secure this region’s economic future and quality of life.

Sincerely,

Vicki Pearse

Pacific Grove

September 4, 2012

To: Fort Ord Reuse Authority
920 2nd Ave., Suite A
Marina, CA 93933

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Sincerely,

Vicki Pearse
Pacific Grove