

# **FORT ORD DUNES STATE PARK**

## **General Plan and Environmental Impact Report**

**(Response to Comments)**



**Volume 2 of 2**

Approved by the State Park and Recreation Commission on September 17, 2004



**The Final General Plan for Fort Ord Dunes State Park is in two volumes.**

This is ***Volume 2: Responses to Comments***, which contains the comments received during the public review of the General Plan, California State Parks responses to these comments, recommended changes to the General Plan, and CEQA compliance documentation related to this plan.

The other volume, ***Volume 1: General Plan and Environmental Impact Report*** presents the park's existing conditions, planning influences and issues, plan proposals, the visitor carrying capacity evaluation, the environmental analysis, and appendices.



#### **GENERAL PLANNING INFORMATION**

If you would like more information about the general planning process used by California State Parks or have questions about specific general plans, contact:

Planning Section  
California State Parks  
P.O. Box 942896  
Sacramento, CA 94296 - 0001

# FORT ORD DUNES STATE PARK

## General Plan and Environmental Impact Report

(Responses to Comments)

Vol. 2 of 2

SCH # 2003051145

*Arnold Schwarzenegger*  
*Governor*

*Michael Chrisman*  
*Secretary for Resources*

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State of California - The Resources Agency  
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# CHAPTER 1

## INTRODUCTION

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### **PURPOSE OF THE FINAL ENVIRONMENTAL IMPACT REPORT**

This report has been prepared to accompany the Preliminary General Plan and Draft Environmental Impact Report (EIR) for the California Department of Parks and Recreation's (the Department) Fort Ord Dunes State Park General Plan. The General Plan provides goals and guidelines that direct future development of the park while preserving the environmental integrity of the park. The Draft EIR provides a program-level analysis of the potential environmental impacts associated with the Preliminary General Plan. Because the goals and guidelines provide direction to future projects on how to avoid, or minimize potential impacts, the General Plan is a self-mitigating document. This document responds to the comments on the Draft EIR and makes revisions to the EIR, as necessary, in response to these comments. This document also makes staff-initiated text revisions that update information presented in the Preliminary General Plan/Draft EIR. Together with the Draft EIR, this document constitutes the Final EIR for the project.

The Final EIR is an informational document prepared by the lead agency that must be considered by decision-makers before approving or denying a proposed project. This document has been prepared pursuant California Environmental Quality Act (CEQA) Guidelines (Section 15132) which specify the following:

The Final EIR shall consist of:

- (a) The draft EIR or a revision of the draft.
- (b) Comments and recommendations received on the draft EIR either verbatim or in summary.
- (c) A list of persons, organizations, and public agencies commenting on the draft EIR.
- (d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process.
- (e) Any other information added by the Lead Agency.

## **ENVIRONMENTAL REVIEW PROCESS**

The Department released the Fort Ord Dunes State Park Preliminary General Plan/Draft EIR for public review in late January, 2004. It was received by the State Clearinghouse (No. 2003051145) on January 23, 2004. The public review and comment period on the Draft EIR began on January 29, 2004 and closed March 14, 2004, as designated by the State Clearinghouse. Upon approval of the General Plan and certification of the Final EIR by the State of Park and Recreation Commission, the Department may proceed with consideration of project development and approval actions.

## **CHAPTER 2**

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### **COMMENT LETTERS AND RESPONSES TO COMMENTS**

This chapter contains copies of comments postmarked or faxed within the CEQA comment period (January 29, 2004 through March 14, 2004) and responses to those comments. In a good faith effort to consider all comments received, this chapter also includes copies of comments postmarked or faxed after the close of the CEQA comment period and consideration of those comments. Each comment is numbered in the margin of the comment letter, and the responses to all of the comments in a particular letter follow. The comments are referenced by comment letter and comment number.

#### **COMMENT LETTERS POSTMARKED WITHIN THE CEQA COMMENT PERIOD AND RESPONSES TO THOSE COMMENTS**

The agencies, organizations, and individuals listed on Table 2-1 provided written comments on the Fort Ord Dunes State Park Preliminary General Plan/Draft EIR that were postmarked within the CEQA comment period. The written comments are printed in this section, followed by responses. A brief summary of the issue(s) raised in each comment precedes each response in order to provide context. The comment summary is not intended to be comprehensive; all comments on the content and adequacy of the Draft EIR are responded to in full.

As stated in CEQA Guidelines, Article 13, Section 15204: CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by a commenter. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.

Where a comment results in a text revision, the revision is included within the response to the comment generating the text change. However, sections requiring extensive revision may be located within Chapter 3, Preliminary General Plan and Environmental Impact Report Text Revisions, which includes all text revisions resulting from Department staff recommendations and as the result of comments generated during the CEQA comment period. Text revisions include ~~deleted text~~, indicating text that has been removed from the EIR. Text that has been added to the General Plan/EIR is presented as single underlined.

**TABLE 2-1  
FORT ORD DUNES PRELIMINARY GENERAL PLAN/DRAFT EIR COMMENT LETTERS**

| <b>Comment Letter Number</b> | <b>Commenter</b>  | <b>Affiliation</b>  | <b>Location</b>                | <b>Date Postmarked or Faxed/ Date Received</b> | <b>Comment Topics</b>                  | <b>Number of Comments</b> |
|------------------------------|---|---|--------------------------------|--|--|---------------------------|
| 1                            | Janet Brennan,<br>Supervising Planner,<br>Planning and Air<br>Monitoring Division | Monterey Bay Unified<br>Air Pollution Control<br>District         | Monterey, California           | February 4, 2004/<br>February 4, 2004          | Air Quality                            | 3                         |
| 2                            | Robert S. Jaques,<br>Director of Engineering<br>Planning and<br>Technology        | Monterey Regional<br>Water Pollution<br>Control Agency            | Monterey, California           | February 20, 2004/<br>February 22, 2004        | Wastewater                             | 3                         |
| 3                            | Harold A. Short   | Bay Area Naturalists,<br>Naturalist Society                       | Corralitos, California         | February 24, 2004/<br>February 27, 2004        | Clothing-optional<br>Beach Use         | 1                         |
| 4                            | John W. Fischer   | not applicable  | Pacific Grove,<br>California   | February 25, 2004/<br>March 2, 2004            | Natural Resources                      | 3                         |
| 5                            | Brett C. Becker,<br>Associate Planner   | Monterey County<br>Planning and Building<br>Inspection Department | Marina, California             | March 5, 2004/<br>March 9, 2004                | Site-specific and<br>Regional Planning | 12                        |
| 6                            | Mike Galizio, District 5<br>Development Review<br>Branch                          | State of California<br>Department of<br>Transportation            | San Luis Obispo,<br>California | March 11, 2004/<br>March 11, 2004              | Transportation                         | 6                         |
| 7                            | B. Hunter Harvath, AICP,<br>Planning Manager                                      | Monterey-Salinas<br>Transit                                       | Monterey, California           | March 12, 2004<br>March 15, 2004               | Transportation                         | 3                         |

**TABLE 2-1 (Continued)**  
**FORT ORD DUNES PRELIMINARY GENERAL PLAN/DRAFT EIR COMMENT LETTERS**

| <b>Comment Letter Number</b> | <b>Commenter</b>   | <b>Affiliation</b>  | <b>Location</b>     | <b>Date Postmarked or Faxed/ Date Received</b> | <b>Comment Topics</b> | <b>Number of Comments</b> |
|------------------------------|--|---|---------------------|--|-----------------------|---------------------------|
| 8                            | Daniel E. Keen, City Manager                                       | City of Seaside   | Seaside, California | March 11, 2004/<br>March 15, 2004              | Regional Planning     | 2                         |
| 9                            | Wm. Reichmuth, P.E., Executive Director                            | Transportation Agency for Monterey County                           | Salinas, California | March 12, 2004/<br>March 15, 2004              | Transportation        | 8                         |
| 10                           | David M. Pereksta, Division Chief, Santa Cruz/San Benito/ Monterey | United States Department of the Interior, Fish and Wildlife Service | Ventura, California | March 12, 2004/<br>March 15, 2004              | Biological Resources  | 11                        |
| 11                           | Dr. Suzanne Worcester, Biology Professor                           | California State University Monterey Bay                            | Marina, California  | March 13, 2004/<br>March 15, 2004              | Natural Resources     | 17                        |



# MONTEREY BAY

Unified Air Pollution Control District  
serving Monterey, San Benito, and Santa Cruz counties

AIR POLLUTION CONTROL OFFICER  
Douglas Quetin

24580 Silver Cloud Court • Monterey, California 93940 • 831/647-9411 • FAX 831/647-8501

**DISTRICT BOARD MEMBERS**

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John Myers  
King City

February 3, 2003

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FEB 04 2004

**NORTHERN SERVICE CENTER**

Jason Spann  
Project Coordinator  
California Department of Parks and Recreation  
Northern Service Center  
One Capitol Mall, Suite 500  
Sacramento, CA 95814

**SUBJECT: DEIR FOR FORT ORD DUNES STATE PARK PRELIMINARY GENERAL PLAN**

Dear Mr. Spann:

Staff has reviewed the referenced document and has the following comments:

- We concur that the project would not have a significant impact on either regional or localized air quality. We note the following:
  - (1) If earthmoving is limited to 8.1 acres per day and grading and/or excavation to 2.2 acres per day, no other mitigation would be needed. | 2
  - (2) Estimates for operational emissions for motor vehicles seem excessively high. District estimates show 22 lbs/day of VOC, 29 lbs/day of NOx and 274 lbs/day of CO in contrast to emissions of 62, 125 and 773, respectively. | 3

Thank you for the opportunity to review the document. Please do not hesitate to call if you have any questions.

Sincerely,

Janet Brennan  
Supervising Planner  
Planning and Air Monitoring Division

- 1 JANET BRENNAN, MONTEREY BAY UNIFIED AIR POLLUTION CONTROL DISTRICT
- 1-1 The Monterey Unified Air Pollution Control District states that the project (the Fort Ord Dunes General Plan) would not have a significant impact on either regional or localized air quality. This comment is noted.
- 1-2 The Monterey Unified Air Pollution Control District states that no further air quality mitigation would be required for construction related activities, if construction activities remain within prescribed limitations. Further review of the Monterey Bay Unified Air Pollution Control District's requirements and recommendations would occur during area- and site-specific planning.
- 1-3 The Monterey Unified Air Pollution Control District notes that estimates for operational emissions for motor vehicles seem excessively high. Given that the Fort Ord Dunes General Plan/EIR is a program-level document for which detailed information regarding park operations is not specified, the Department has assumed a conservative estimate for new vehicle trips. The Department would undergo area- and site-specific planning for implementation of General Plan elements and would review the Monterey Bay Unified Air Pollution Control District's estimates for operational emissions for motor vehicles when further information regarding proposed park operations is developed.



# Monterey Regional Water Pollution Control Agency

*"Dedicated to meeting the wastewater and recycled water needs  
of our member agencies, while protecting the environment."*

Administration Office:  
5 Harris Court, Bldg. D, Monterey, CA 93940-5756  
(831) 372-3367 or 422-1001, FAX: (831) 372-6178  
Website: [www.mrwPCA.org](http://www.mrwPCA.org)

February 18, 2004

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**FEB 22 2004**

**NORTHERN SERVICE CENTER**

Jason Spann  
Project Coordinator  
Northern Service Center  
California Department of Parks and Recreation  
One Capitol Mall, Suite 500  
Sacramento, CA 95814

**Subject: Fort Ord Dunes State Park Preliminary General Plan and Draft EIR**

Dear Mr. Spann:

This Agency provides wastewater collection, treatment, disposal, and recycling services throughout the sewered portions of northern Monterey County. Our comments on the subject document, referred to herein as the "Document", pertain solely to wastewater related issues.

As noted in our letter to you of June 10, 2003, we operate and maintain a regional interceptor pipeline that goes through the full length of the Fort Ord Dunes State Park property. Associated with this interceptor line is an emergency overflow pipeline to the existing (but now abandoned) Main Garrison wastewater treatment plant percolation pond that is the one nearest the ocean. In conjunction with the recently completed construction of the adjacent storm water percolation ponds, the overflow piping to this pond was modified slightly so it would remain operable as an emergency overflow pond.

In the event of a catastrophic event at our Fort Ord pump station, the flow would backup and temporarily overflow into the pond. After the problem had been repaired, that flow would drain back into the pump station and be pumped to the treatment Plant. Having this emergency overflow basin capability provides a margin of safety against possibly having a sewer system backup that could lead to a spill.

We support the recommendations contained in the Document on page 2-88, and under OPS-5 on page 3-39, that buffer zones be provided around these ponds, the Agency's pump station, and the site of the former wastewater treatment plant, in order to avoid

public access to any of these facilities. Within the Agency's wastewater overflow pond are some of the groundwater cleanup injection wells mentioned on page 2-65 of the Document. A buffer zone would also protect these facilities from possible vandalism.

1  
cont.

There are numerous manhole structures located along the length of our interceptor pipeline that is mentioned on page 2-58 of the Document. To the extent that it is possible, it would also be desirable to keep any visitor attracting facilities away from these to avoid vandalism or interference with our routine preventive maintenance activities.

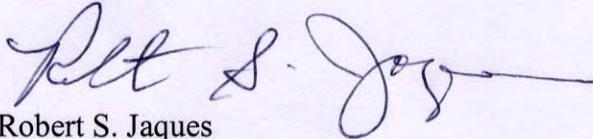
2

The Document notes on page 4-56 that any wastewater services for the Park would be provided through the Marina Coast Water District. We support that approach, as it would not be feasible for any of the Park's wastewater to be discharged directly to the Agency's pipeline that runs through the Park.

3

Thank you for the opportunity to provide these comments.

Sincerely,



Robert S. Jaques  
Director of Engineering Planning and Technology

Cc Ken Gray, California Department of Parks and Recreation Monterey Office

2 ROBERT S. JAQUES, MONTEREY REGIONAL POLLUTION CONTROL AGENCY

2-1 The Monterey Regional Water Pollution Control Agency describes their facilities within Fort Ord Dunes, which are also described on pages 2-58 and 2-59 of the General Plan/EIR. The Pollution Control Agency supports General Plan Guideline OPS-5 calling for buffer zones around their facilities. This comment is noted.

2-2 The Pollution Control Agency requests that, to the extent possible, visitor attracting facilities not be located in the vicinity of manhole structures located along the length of Beach Range Road. Further review of the Monterey Regional Pollution Control Agency request would occur during area- and site-specific planning. However, it is noted that Beach Range Road is envisioned as a main travel corridor for the park and it is likely that some level of public use would occur in the vicinity of the manhole structures noted by the Pollution Control Agency. Implementation of Guidelines PUB-3 through PUB-8 (public safety and law enforcement prescriptions), as well as Interpretation and Education Resources guidelines advocating public education regarding appropriate visitor use activities would reduce potential vandalism and interference with the Pollution Control Agency's facilities.

2-3 The Pollution Control Agency states that it would not be feasible for any of the Park's wastewater to be discharged directly to the Agency's pipeline that runs through the park, beneath Beach Range Road. The Department has not considered direct wastewater discharge into the Pollution Control Agency pipeline beneath Beach Range Road. General Plan Guideline PUB-1 calls for identification of potential utilities service providers and coordination with service providers, prior to area- and site-specific planning. This guideline also calls for the Department to identify infrastructure requirements and determine where and how utilities would be provided.

*Harold A. Short*  
 1575 Tindall Ranch Road  
 Corralitos, California 95076  
 Phone: (831) 761-3612

February 23, 2004

Jason Spann  
 Project Coordinator, Fort Ord Dunes State Park  
 California Department of Parks and Recreation  
 Northern Service Center  
 One Capitol Mall, Suite 500  
 Sacramento, CA 95814

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**FEB 27 2004**

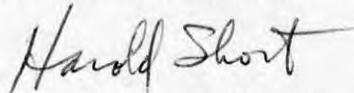
**NORTHERN SERVICE CENTER**

Dear Jason,

It was a pleasure meeting you in Monterey last Wednesday evening. I believe we talked about my interest at that time, but I would like to re-iterate it for the written record. I observed in response to the user survey that was sent out, as noted in Appendix C (page 4) of the General Plan, that of the 155 responses 109 were from people that desired a clothing-optional/nude beach. This number even topped the expected high number for 'Hiking, walking and beach-combing' at 84. Of course, hiking, walking and beach-combing can also be done while nude. Considering the extremely high number of responses, it seemed very strange to me that nothing was mentioned in the details of the GP about designating a C/O area. Possibly the GP is meant to be in more general terms that ignores such specificity. The detail of such can be worked out when the use patterns start to form as the park opens to the public.

As background, the area known as Indian Head Beach (shown on some earlier maps) at the north end of the current projected park and just south of the Marina Beach State Park, has been used as a C/O site for many years, even while the Army base was in operation. Users generally enter from the Lake Court parking area in Marina. As this trail is to be retained and the light pedestrian traffic patterns are likely to remain as they have been in the past, it would be desirable for us to continue this use. If problems of more foot traffic of non-nudist users develops, it has been found useful in other areas around the country, to post a couple of signs announcing that the "area ahead is used by nude sunbathers" and let the other users decide whether to proceed or not. I and our organizations are available to discuss these options whenever you are that point in your planning.

Best regards,



Harold Short, Bay Area Naturists, of the Naturist Society.

Cc: Rich Pasco, South Bay Naturists  
 Charles Harris, Naturist Action Committee

3 HAROLD A. SHORT, BAY AREA NATURISTS, NATURIST SOCIETY

- 3-1 Mr. Short notes that commenters providing input during the General Plan development process expressed interest in clothing-optional beach use. As noted by Mr. Short, the General Plan is not specific in nature and does not designate detailed facilities or types of use. For instance, the General Plan calls for beach use as a potential public use type, but does not specify the types of beach use that may be appropriate. However, the Department has considered Mr. Short's interest in inclusion of a designated clothing optional beach area at Fort Ord Dunes. At this time, the Department does not believe that Fort Ord Dunes includes an area that could be appropriately designated for clothing optional use.

February 26, 2004

RECEIVED

MAR 02 2004

Mr. Jason Spann  
Project Coordinator  
California Department of Parks and Recreation

NORTHERN SERVICE CENTER

Subject: Fort Ord Dunes State Park Preliminary General Plan  
And Draft Environmental Report

Dear Mr. Spann

First, I would like to congratulate all who participated in the preparation of this document. I may not be as diligent or as knowledgeable as some the respondents; but, I did especially review an area of my concern. From that, I do have some comments and questions for clarification.

p. 2-54: In the third paragraph, the sentence that begins "The former Stillwell Hall..." is the only note about the rip-rap that I could find other than in Fig. 2.4. Does the plan assume that the Department of the Army will remove the rocks? I find no comments about what could occur from the removal. Do I assume that Impact Geo-1 on page 4-33 applies relative to the establishment of a Western Snowy Plover Management Plan under Bio-3 on page 3-14?

1

2

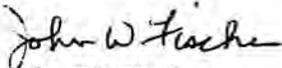
p. 2-88 The last sentence in the first paragraph notes speaks about critical habitats for western snowy plovers. Do I assume, as in my comment above, that this will also be included under Impact Geo-1?

My last comment notes that the Western Snowy Plover Management Plan is listed as Bio-4 under ES-4 and Bio-3 on p.3-14.

3

Thank you for the opportunity to submit my comments on this document.

Respectfully,

  
John W. Fischer  
230 Grove Acre, #313  
Pacific Grove, CA 93950  
Snowy@ecologyfund.net

4 JOHN W. FISCHER

- 4-1 Mr. Fischer inquires regarding the status of shoreline reinforcement related to the former Stilwell Hall. As noted on General Plan/EIR page 2-48, removal of the reinforcement (rip-rap) is included in the Army's Stilwell Hall removal project. While rehabilitation at this location is included in the Army's removal project, the Fort Ord Dunes State Park General Plan includes policies for monitoring and documenting geologic processes at the park, including seacliff retreat, to the extent possible (Guideline GEO-2) and for implementing protective measures as necessary (Guideline GEO-3).
- 4-2 Mr. Fischer inquires whether General Plan Policy GEO-1 and Impact Geo-1 are related to Western Snowy Plover Management. Policy GEO-1 calls for exclusion of new facilities and permanent structures expected to be subject to coastal erosion within 100 years of construction and is not related to establishment of a Western Snowy Plover Management Program. Policies related to Western Snowy Plover management are located in Guidelines BIO-1 through BIO-3, and in the establishment of the Natural Resource Management Zone, which maximizes inclusion of known special-status species and habitat areas, and minimizes public uses and facilities, as compared to other park management zones.
- 4-3 Mr. Fischer notes a text error in the General Plan/EIR Executive Summary. General Plan/EIR Table ES-1 includes several text modifications, based on clarifications recommended by Department staff and as a result of comments, such as this one. Due to the extent of revisions to this table, text revisions are not included within the comments and responses chapter, but may be reviewed in Chapter 3 of this document, within the Staff-initiated Text Changes section.

# MONTEREY COUNTY



## PLANNING AND BUILDING INSPECTION DEPARTMENT

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 COASTAL OFFICE, 2620 1st Avenue, MARINA, CALIFORNIA 93933 PLANNING: (831) 883-7500 BUILDING: (831) 883-7501 FAX: (831) 384-3261

March 5, 2004

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**MAR 09 2004**

**NORTHERN SERVICE CENTER**

Mr. Jason Spann  
 Project Coordinator  
 California Department of Parks and Recreation  
 Northern Services Center  
 One Capitol Mall, Suite 500  
 Sacramento, CA 95814

**Subject: Comments on Fort Ord Dunes State Park Preliminary General Plan/Draft EIR**

Dear Mr. Spann:

Thank you for the opportunity to review and comment on the Preliminary General Plan and Draft EIR for the Fort Ord Dunes State Park. Staff respectfully submits the following comments:

### **Future County Jurisdiction**

1. Please expand on the discussion of regional plans and policies on pages 2-66, 2-67, 2-83. The County is currently going through the Periodic Review for its Local Coastal Program. It is anticipated that Fort Ord Dunes State Park will eventually be transferred to Monterey County's local permitting authority pursuant to its incorporation into the North County Land Use Plan. References to the North County Land Use Plan policies and a consistency analysis should be either incorporated in the individual goals and guidelines or stated more clearly as a summary early on.

### **Specific Comments**

#### Ch. 2 – Existing Conditions and Issues

2. Pages 2-66, 2-67, 2-83 – Consider discussion on the County's Periodic Review and the park's potential incorporation into the North County Land Use Plan. The North County Land Use Plan may designate the park as an Open Space Recreation zone rather than a Public/Quasi-Public zone (Open Space Recreation is zoning used for Moss Landing State Beach).
3. Page 2-68 – Consider adding the HMP to the Appendix Section if the document is not too large.

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4. Pages 2-69, 2-70 – Items 1-3 are very important and need to be emphasized within the General Plan policies/goals and adequately analyzed in the EIR. Item 1 discusses the objective of enhancing the visual character of the State Highway 1 Scenic Corridor and minimizing visual intrusions of structures and camping facilities containing RV vehicles. The proposed camping facility within the bunker area is highly visible from State Highway 1 as you are going north from Monterey. Consider a more detailed discussion in the GP and EIR with regards to how this project meets this objective. Consider reducing the scope of the proposed camping facilities (similar to Minimal Facility Alternative on Page 4-62) if this better meets this objective. Item 2 discusses incorporating a visitor center and gateway function into the Marina's Town Center Planning Area. Consider a more detailed discussion in the GP on how this project will be integrated and complimentary to the residential and mixed use development proposed east of State Highway 1. Item 3 discusses management of traffic impacts due to park usage (RV/camping vs. day use vs. residential/mixed use). Consider a more detailed discussion in the GP and EIR with regards to how this project meets this objective. Ensure that park usage is compatible with the residential and mixed uses. Also, there is limited access to the park via 2 entrances located east of Highway 1. These access points are located within the residential and mixed use areas. Are there alternative access points? How will proposed park usage impact proposed traffic patterns within this area? Is there statistical data to answer these questions?

3

### Ch. 3 – The Plan

5. Pages 3-23, 3-27 – Consider more emphasis on the Stillwell Hall interpretive theme due to its historic importance to the community and the fact that it had to be demolished due to its precarious position on the bluff.
6. Pages 3-33, 3-34 – Consider strengthening the goals/policies with regards to sustainability and sustainable design practices. New development within the park with high sustainable design standards could set an example for the local development community and set in motion other new developments conducted by governmental agencies with similar high sustainable design standards (the new NRDC building in Santa Monica is a good example).
7. Page 3-35 – Consider elaborating on bicycle access such as the creation of bicycle lanes (Class 1? Class 2?). Consider locating bicycle rental facilities and additional park parking for visitors with bicycles east of Highway 1.
8. Page 3-37 – Consider developing new parking areas that are pervious (decomposed granite) as opposed to impervious (asphalt). Consider making all road and parking surfaces pervious.
9. Page 3-53 – Consider elaborating on the proposed parking and visitor area within the former Stillwell Hall site. Will the development be sufficiently setback from the retreating bluffs to allow for coastal erosion without a future need for seawalls or other protective devices/barriers?

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8

Ch. 4 – Environmental Analysis

10. Pages 4-70, 4-71 – Under the Land Use and Planning Section, consider a more detailed discussion on how the project will be consistent with the policies contained in the North County Land Use Plan, assuming that the park will eventually be incorporated into this Land Use Plan. 9
11. Pages 4-56, 4-57 – Is there any information on what the water requirements of the proposed development or built-out scenario will be? 10

**General Comments**

12. Consider including more detail and information to support the conclusions. For example, provide a range on the number of visitors expected, whether there will be limitations on usage and times, as well as supporting information for proposed water usage. This general plan sets the overall direction and it is important to ensure that its proposals are feasible. 10
13. Consider adding an Implementation Section be added detailing how the plan will be implemented. 11
14. Consider a process for developing future plans and addressing permitting requirements and local jurisdictional authority. 11
15. The surveys attached in the Appendix section show that the Number 1 activity that the survey respondents would like to have is a clothing-optional beach, nude recreation. Consider discussing the overall survey responses within the Plan section and reasons why a clothing-optional area was not considered as part of this project (the cold and foggy weather may be one possible reason). 12

Thank you for the opportunity to provide input on this document. Please contact me with any questions you may have at: (831) 883-7563; or email at: [beckerbc@co.monterey.ca.us](mailto:beckerbc@co.monterey.ca.us).

Sincerely,



Brett C. Becker, Associate Planner  
Monterey County Planning and Building Inspection

cc: Jeff Main, Planning and Building Inspection Manager

5 BRETT C. BECKER, MONTEREY COUNTY PLANNING AND BUILDING INSPECTION

- 5-1 Monterey County provides planning updates for the North County Land Use Plan. Because the incorporation of Fort Ord Dunes within the North County Land Use Plan has not occurred, it would be speculative to evaluate the consistency of the Fort Ord Dunes General Plan with the North County Land Use Plan at this time. Should Fort Ord Dunes be incorporated within the Monterey Counties North County Land Use Plan during implementation of the Fort Ord Dunes State Park General Plan, consistency with the North County Plan would be conducted. However, as requested by Monterey County, reference to the Periodic Review for its Local Coastal Program has been included in the General Plan discussion of regional plans and policies. In response to Comment 5-1, pages 2-67, paragraph 1 has been revised as follows:

The Preliminary Draft Monterey County General Plan designates the area that includes Fort Ord Dunes as a Public/Quasi-Public zone. This category applies to a variety of existing and proposed uses that are either operated by a public agency or serve the public at large. Public quasi-public uses include parks, recreation areas, and natural reserves. Monterey County is undergoing the Periodic Review for its Local Coastal Program and anticipates that the Coastal Development Permit Authority for Fort Ord Dunes State Park will eventually be transferred to Monterey County's local permitting authority pursuant to its incorporation into the North County Land Use Plan. The North County Land Use Plan may designate Fort Ord Dunes as an Open Space Recreation zone rather than a Public/Quasi-Public zone.

- 5-2 Monterey County requests that the U.S. Army Corps of Engineers *Installation-wide Multispecies Habitat Management Plan for Former Fort Ord, California* be appended to the Fort Ord Dunes General Plan/EIR. Given the size of the Habitat Management Plan, and because the focus of the document extends well beyond Fort Ord Dunes, the Habitat Management Plan is incorporated by reference into the Fort Ord Dunes General Plan/EIR and is not appended. The Habitat Management Plan is available through the U.S. Army and is available on the Army's former Fort Ord Environmental Cleanup Website (<http://www.fortordcleanup.com/foprimer/speciesact.asp>).
- 5-3 Monterey County comments on Fort Ord Reuse Authority Reuse Plan land uses and objectives indicated for Fort Ord Dunes. While the Department conducted their general planning efforts to be consistent with the goals

and policies of the Reuse Plan for the former Fort Ord military reservation to the extent possible, it is noted that the California Department of Parks and Recreation is exempt from the requirement to use property transferred from the federal government in a manner consistent with the plan for future use and development of the former Fort Ord military reservation.

While Monterey County expresses concern regarding the visibility of a potential campsite within the Storage Bunker Management Zone, it is noted that this general location was selected as a potential campsite in large part for its lack of visibility from areas outside Fort Ord Dunes. Views of the Storage Bunker Management Zone are nearly completely blocked from State Route 1, with the exception of the southern most bunkers, by existing intervening roadside vegetation, the split formation of the highway in this location, and the topography of highway “island” and land located adjacent to the highway (see General Plan/EIR Figure 2-8). An existing cypress grove in the center portion of the Storage Bunker Management Zone would serve to further screen potential campsites from view from the highway or other areas outside of Fort Ord Dunes. General Plan/EIR pages 4-10 through 4-12 describe potential program level aesthetic resources impacts and mitigation measures associated with development of park facilities. Implementation of design guidelines and vegetation protection and restoration activities would reduce the potential program-level aesthetic quality impact associated with the implementation of the Fort Ord Dunes State Park General Plan. However, it is noted that additional planning at the area- and site-specific level would further consider aesthetic resources issues related to campground development, as well as other natural, cultural, and social resource topics.

Inclusion of a park visitor center and gateway function into the City of Marina’s Town Center Planning Area is a recommendation of the Fort Ord Reuse Plan that has not been carried into the Fort Ord Dunes General Plan. As described under General Plan Policy REG-4, the Department may consider development of a regional multi-agency visitor center. However, a cooperative joint agency and program and a potential site location have not been identified at this time. Should the Department pursue this opportunity, area- and site-specific planning would be conducted to address the County’s concerns regarding integration of such a facility with local communities east of State Route 1. As emphasized throughout the General Plan, coordinated regional planning is necessary for successful development of Fort Ord Dunes General Plan, as well as redevelopment of the former Fort Ord military reservation and for ongoing management of the Monterey Bay Coastline and regional recreational opportunities.

- As noted by Monterey County, the roadway network that currently provides access to Fort Ord Dunes is limited and the Department has identified two potential park entrances, 8th Street overpass and 1st Street underpass. At this time, the Department has not identified another feasible park entrance, given the limitations of the existing road network. However, this issue may be revisited in the future, should changed conditions (i.e., modification to the local and regional circulations) and could result in a future General Plan update. While the cities of Marina and Seaside include residential areas to the east of Fort Ord Dunes, it is noted that the land uses located in the vicinity of the potential park entrances consist primarily of commercial retail and public/institutional uses (see General Plan/EIR Figure 2-1). At the general plan level, these uses appear to be consistent with a potential park entrance location. Potential traffic circulation impacts and mitigation measures are discussed on General Plan/EIR pages 4-52 through 4-53, including the potential increase in park-related traffic that may affect local roadways and their adjacent land uses (both existing and land uses planned by other jurisdictions). Implementation of Guidelines CIR-1 through CIR-3 (transportation and access design guidelines) and Mitigation Measure Tra-1 (conduct a traffic study and implement study recommendations) would reduce the potential impact to less than significant at the program level.
- 5-4 Monterey County recommends placing more emphasis on the Stilwell Hall interpretive theme. The interpretive themes included on pages 3-20 through 3-27 are summary descriptions and are not intended to encompass the full scope of the interpretive program. The interpretive program would be developed over the course of General Plan implementation; therefore, the scope of the Stilwell Hall interpretation cannot be determined at this time. However, the former Stilwell Hall is recognized as an important element of the history of Fort Ord Dunes and would be featured within the Fort Ord Dunes State Park interpretive program.
- 5-5 Monterey County recommends strengthening goals and policies regarding sustainability and sustainable design practices. As noted on General Plan page 3-33, sustainability is integrated as a basic concept within the General Plan, as illustrated in the management guidelines and recommendations for facility locations based on natural resource opportunity and constraints analysis. The General Plan sustainability goal and related guidelines call for incorporation of principles and practices of sustainability into the parks design, improvements, and maintenance and operations, emphasizing environmental sensitivity and 'green' building

concepts. Site- and area-specific planning would further detail the topic of sustainability and sustainable design practices.

- 5-6 Monterey County recommends inclusion of facilities emphasizing bicycle use. The Department has emphasized the need for non-motorized forms of transportation throughout the planning process, as noted under Site Opportunities and Potential, Circulation (General Plan/EIR page 2-92). Guideline CIR-2 calls for incorporation of bicycle access at key public access points, shared trail connections, and maximized non-vehicular access. Guideline CIR-3 recommends a park shuttle system linking vehicle and pedestrian/bicycle entrances and parking areas. Guidelines CIR-12 through CIR-18 specifically address recreational trails, including development of a Unit trails Plan, and establishment of connector trails and bicycle lanes. Guideline REC-4 calls for consideration of possibilities for private concessions to provide recreational activities that are not offered by the Department, such as bicycle rental. Finally, guidelines for management zones that include day-use parking (8th Street, Storage Bunker, and Park Support/Administration) encourage use of parking areas for vehicle staging and further exploration of the park by non-vehicular means, on designated trails. It is also anticipated that the 1st Street pedestrian underpass could include non-motorized visitor access to the park from areas east of State Route 1 (see General Plan/EIR page 3-55). Site- and area-specific planning would determine the appropriate location and classification of bicycle lanes and staging/rental facilities.
- 5-7 Monterey County recommends use of pervious surfaces for park roads and parking areas. General Plan Guideline HYD-6 calls for limiting impervious surfaces to minimize runoff; and considering the use of permeable materials during the design of new or expanded roadways, parking lots, and trails. Site- and area-specific planning would further examine the feasibility of use of pervious surfaces for park roads and parking areas.
- 5-8 Monterey County requests further detail regarding proposed development at the former Stilwell Hall site, particularly regarding coastal erosion. The General Plan does not designate detailed facilities with specific size, design, or locations. However, the general facilities and uses that may be considered in the 8th Street Management Zone (including the former Stilwell Hall site) are described on pages 3-53 through 3-55 of the Management Plan/EIR. Area planning at the former Stilwell Hall site would be subject to parkwide General Plan Guideline GEO-1 calling for exclusion of new facilities and permanent structures from areas expected to be subject to coastal erosion within 100 years of construction. Exceptions may be allowed for roads, trails, and facilities that may be

considered expendable. Guidelines GEO-2 and GEO-3 call for monitoring and documenting geologic processes, including coastal erosion, and undertaking protective measures if necessary. While facilities have not yet been designated for the former Stilwell Hall site, implementation of these guidelines would address potential local and parkwide coastal erosion.

- 5-9 Monterey County requests that a detailed discussion be provided for consistency with the North County Land Use Plan, assuming the park will eventually be incorporated into this Land Use Plan. See the response to Comment 5-1. The General Plan has considered the existing and potential land use patterns of adjacent jurisdictions at a preliminary level, but has not conducted a detailed consistency analysis. However, it is noted that the General Plan calls for review of all area- and site-specific development plans for consistency with resource and land use plans, as appropriate (General Plan Policy REG-3). As noted in response to Comment 6-1, should Fort Ord Dunes be incorporated within the Monterey County's North County Land Use Plan during implementation of the Fort Ord Dunes State Park General Plan, consistency with the North County Plan would be conducted during Coastal Development Permit processing, as appropriate.
- 5-10 Monterey County requests information on park water usage requirements, numbers of visitors, and types of visitor uses. As described on General Plan/EIR page 3-1, the purpose of the General Plan is to describe the desired resource conditions of the new park unit, the goals for recreation facility development, and the desired visitor experiences that will be available in the park, and to provide goals and guidelines that will direct future management efforts toward achieving those desires. The General Plan, by necessity, is visionary in nature, with much of its content driven by current issues. Parkwide and area goals and guidelines are prescribed, which state the management intentions and provide general guidance supportive of the park's natural, cultural, scenic, and recreational resources. To the extent possible, the General Plan establishes ranges for future facilities that indicate potential facilities size, projected uses, and number of users that are considered to be compatible with the desired visitor experiences and the resources that exist within planning areas. Estimations of the maximum number of facilities that could be accommodated within park management zones (see General Plan/EIR Chapter 3) were used for program-level impact analysis, based on resource conditions and physical connections. However, because Fort Ord Dunes has no history of public use, projections of visitors and utilities requirements based on user demands and regional planning, such as roadway infrastructure restrictions, cannot be conducted at this time. The

projections described below are for informational use only and capture operation of all facilities that could be accommodated within the park at full capacity.

The types of visitor uses that would be permitted at Fort Ord Dunes are described throughout General Plan Chapter 3, The Plan; however, park hours would be determined during General Plan implementation. Assuming development of the highest level of potential General Plan park facilities (up to approximately 286 parking spaces, 110 campsites, and a youth hostel), a conservative estimation of potential park visitors indicates a maximum of approximately 3,350 visitors per day. This maximum estimate assumes that the 286 parking spaces would have a turnover rate of 2.5 times per day and campsites and youth hostel beds would have a turnover rate of 1.0, on a day when the park is operating at full capacity and where each day use and campsite group includes 4 people. The Fort Ord Reuse Authority has designated an annual allocation of 45 acre-feet for Fort Ord Dunes State Park, as indicated on General Plan/EIR page 2-59. The Department has conducted a preliminary water usage requirement projection, based on the conservative maximum estimate of park users described above, and including potential park administration and operations requirements, and determined that projected water usage requirements would be within the Fort Ord Reuse Authority water allocation. However, area- and site- specific planning would be required to develop detailed water usage projections for park uses. It is noted that General Plan Guideline PUB-1 calls for identification of potential utilities service providers and coordination with service providers prior to area- and site-specific planning. This guideline also calls for the Department to identify infrastructure requirements and determine where and how utilities would be provided.

- 5-11 Monterey County recommends inclusion of an implementation plan and a process for developing future plans that addresses permitting requirements and local jurisdictional authority. Due to the uncertainty of future funding needed to implement the General Plan, or portions of the General Plan, the Department has not developed an implementation (or phasing) plan. Implementation plans require some level of predictability as to available funding. The Department receives funding from various sources, and most of the funding sources have limitations on the use of funds, therefore development of a reliable and useful implementation plan prior to identification of funding (and relevant limitations) is not possible. The Department implements a process to identify and construct proposed projects once funding is made available. This Multiple Year Capital Outlay Plan identifies project budgets and estimates schedules for each potential project.

While a General Plan implementation program has not been developed, it is noted that implementation of any general plan component may require further resource and visitor use studies, CEQA documentation, public review, and often permitting by regulatory agencies which all act to promote sustainable design and appropriate public use levels of a new facility. Future management studies and plans recommended in the general plan would provide more information that would allow park managers to quantify resource standards and, following project funding, construct facilities or introduce resource management programs to achieve desired resource conditions; monitor natural, cultural, and recreational resources and visitor experiences at the park; and manage public use and park resources to avoid deterioration of resources or the visitor experience (General Plan/EIR page 3-64). In addition, the General Plan calls for review of all appropriate area- and site-specific development plans for consistency with resource and land use plans and policies, and where appropriate acquire necessary permits (General Plan Policy REG-3).

- 5-12 Monterey County requests a discussion of overall survey responses from public outreach efforts conducted thus far. The Department has conducted an extensive public outreach effort as part of the Fort Ord Dunes State Park general planning process, including newsletters distributed to an extensive mailing list, and three public meetings. The Department did not formally respond to comments received during the planning process (with the exception of this formal Draft EIR response process). However, the results of those efforts, and the formal and informal comments collected through those efforts, were considered and addressed throughout the General Plan development. The planning team utilized public and agency comments to assess the range of desirable park uses and facilities, and to identify natural, cultural, and social resource sensitivities perceived by commenters. See the response to Comment 3-1 regarding clothing optional beach use.

**DEPARTMENT OF TRANSPORTATION**

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6



*Flex your power!  
Be energy efficient.*

March 11, 2004

MON-001-83.89  
SCH# 2003051145

Jason Spann  
Department of Parks and Recreation  
One Capitol Mall, Suite 500  
Sacramento, CA 95814

**RECEIVED**

**MAR 11 2004**

**NORTHERN SERVICE CENTER**

**SUBJECT:** Fort Ord Dunes State Park Draft EIR

Dear Mr. Lee:

The California Department of Transportation (Department) District 5 has reviewed the Draft Program Environmental Impact Report (EIR) for the Fort Ord Dunes State Park General Plan. The 990-acre project site is located in the unincorporated area of Monterey County adjacent to the Cities of Seaside and Marina. The Program EIR addresses the future development of facilities and management plans for this state facility, subject to future project-specific analysis. District 5 staff offers the following comments for your consideration:

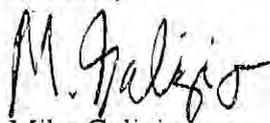
- 1) The discussion of "Regional Plans and Policies" in the Draft EIR (page 2-66) should include a discussion of the Monterey County Regional Transportation Plan (RTP). This discussion should include a description of the transportation project identified in the RTP that are proposed in the vicinity of the new park. 1
- 2) It should be clarified in the Draft EIR (pages 2-89, 2-94, and 3-35) that regional vehicular access to the new park will be provided from Route 1 via the Route 1/Lightfighter Drive and the Route 1/12<sup>th</sup> Street interchanges. 2
- 3) In addition to our Department, the development of the Circulation and Access Management Plan (Guideline CIR-1, page 3-35) and the Units Trails Plan (Guideline CIR-12, page 3-38) should be made in consultation with the Association of Monterey Bay Area Governments (AMBAG), the California Coastal Commission, and the Coastal Conservancy since those agencies are involved in the planning processes for the California Coastal Trail and the Monterey Bay Scenic Sanctuary Trail. 3

Fort Ord Dunes State Park Draft EIR  
State Parks and Recreation Letter – March 11, 2004  
Page 2

- 4) Our Department is statutorily responsible for the planning, design, construction, maintenance, and operation of the State highway system pursuant to the California Government Code and the California Streets and Highway Code. Therefore, the second paragraph in Mitigation Measure Tra-1 (page 4-53) should be revised as follows: “Concurrent with the planning and development of project level facilities and management plans, conduct a traffic study for the park’s components in consultation with the Department of Transportation, TAMC, and other appropriate jurisdictions.” 4
- 5) Any future work or improvements within the Route 1 right of way will require the approval of an encroachment permit from District 5. This encroachment permit requirement should be identified in the Park General Plan. If you have any questions regarding the encroachment permit process, please contact our Permits Office at (805) 549-3206 or visit the following website: [www.dot.ca.gov/hq/traffops/developerserv/permits/](http://www.dot.ca.gov/hq/traffops/developerserv/permits/) 5

The District 5 Development Review Branch would like to receive a copy of the responses to our comments and/or the Final EIR document. In addition, we would like to request a copy of any subsequent hearing notices and reports on this project. If you have any questions, you may call me at (805) 542-4751. 6

Sincerely,



Mike Galizio

District 5 Development Review Branch

cc: Dave Murray, District 5 Planning; Mark McCumsey, District 5 Planning  
Roger Barnes, District 5 Traffic Operations, Steve Senet, District 5 Permits

6 MIKE GALIZIO, STATE OF CALIFORNIA DEPARTMENT OF TRANSPORTATION

- 6-1 The California Department of Transportation requests that a description of the Monterey County Regional Transportation Plan be added to General Plan/EIR Chapter 2, Existing Conditions and Issues. General Plan/EIR page 2-83 notes that Transportation Agency for Monterey County Plans may influence the park unit, which would include the Monterey County Regional Transportation Plan. A description of the Monterey County Regional Transportation Plan has been added to the General Plan/EIR. However, a detailed description of projects that may occur in the vicinity of Fort Ord Dunes is not warranted at the General Plan level. It is noted that the General Plan calls for review of all area- and site-specific development plans for consistency with resource and land use plans, as appropriate (General Plan Policy REG-3). Further, future project specific environmental compliance would require examination of cumulative projects that could be related to the proposed projects, including an evaluation of Regional Transportation Plan projects located in the vicinity of Fort Ord Dunes. In response to Comment 6-1, the following has been added to page 2-71 as paragraph 2:

**Transportation Agency for Monterey County**

The Transportation Agency for Monterey County is a twenty-three member agency which consists of local officials from each of its twelve incorporated cities and five county supervisorial districts, and ex-officio members from six public agencies, including the Association of Monterey Bay Area Governments, Monterey-Salinas Transit, the Monterey Bay Unified Air Pollution Control District, the California Department of Transportation, the City of Watsonville, and the Monterey Peninsula Airport District. The Transportation Agency for Monterey County is Monterey County's State designated Regional Transportation Planning Agency, Congestion Management Agency, Local Transportation Commission, and Service Authority for Freeways and Expressways (TAMC, 2004).

As the Regional Transportation Planning Agency, the Transportation Agency for Monterey County is responsible for developing a plan that reflects the needs, concerns, and actions of all the agencies involved in the region and of the public and as such, prepares and updates the Regional Transportation Plan. The purpose of the Regional Transportation Plan is to provide policy guidance, plans, and programs for the next twenty years to attain balanced comprehensive, multimodal transportation solutions,

considers all modes of travel, and identifies anticipated funding for projects and programs. The Regional Transportation Plan addresses special factors affecting the transportation system, such as air quality, land use, special transportation needs and multimodal integration (TAMC, 2004).

Also in response to Comment 6-1, page 2-83, paragraph 2 has been revised as follows:

**Other Relevant Regional Plans and Policies**

Additional regional plans may influence the unit that represent adjoining jurisdictions or geographic areas, such as:

- Monterey County Local Coastal Program, North County Land Use Plan (City of Marina to Pajaro River)
- Programmatic Agreement with the Advisory Council on Historic Preservation
- ~~Transportation Agency for Monterey County Plans~~

Also in response to Comment 6-1, the following has been added as the first reference to page B-7:

Transportation Agency for Monterey County (TAMC), website information, accessed 2004. <http://www.tamcmonterey.org>

6-2 The California Department of Transportation requests that clarification be made regarding potential highway access points to Fort Ord Dunes. In response to Comment 6-2, page 2-89, paragraph 1 has been revised as follows:

***CIRCULATION***

The existing roadway network that provides access to Fort Ord Dunes is limited; 8th Street is currently the only vehicle access to the dunes. There is also a SR 1 underpass at 1st Street into Fort Ord Dunes that is currently closed by large concrete blocks. Access to the dunes from either 8th Street or 1st Street would require passage through City of Marina and/or City of Seaside streets, contributing to traffic levels on those roadways. Regional vehicular access from SR 1 would be via the SR 1/Lightfighter Drive and the SR 1/12th Street interchanges.

In response to Comment 6-2, page 2-94, paragraph 3 has been revised as follows:

In addition to issues associated with the development of access routes within the park, the methods of accessing the park from nearby cities and freeways needs to be addressed. Currently, the roadway network that provides access to Fort Ord Dunes is limited; 8th Street is the only vehicle access to the dunes. There is also a SR 1 underpass at 1st Street into Fort Ord Dunes that is currently closed by large concrete blocks. Access to the dunes from either 8th Street or 1st Street would require passage through City of Marina and/or City of Seaside streets, contributing to traffic on those roadways. Regional vehicular access from SR 1 would be via the SR 1/Lightfighter Drive and the SR 1/12th Street interchanges. The potential traffic congestion and reductions in levels of service to city streets that may result from park users is a concern for nearby communities.

In response to Comment 6-2, page 3-35, paragraph 2 has been revised as follows:

***Parkwide Circulation***

The general public has not had access to Fort Ord Dunes in the past and the roadway network that provides access to the park is limited. A SR 1 overpass at 8th Street is currently the only vehicle access to Fort Ord Dunes. Access via 8th Street is controlled by a locked gate and access to the underpass at 1st Street into the park is currently blocked large concrete barriers. Access to the park from SR 1 is limited and would occur through streets operated by local jurisdictions. Regional vehicular access from SR 1 would be via the SR 1/Lightfighter Drive and the SR 1/12th Street interchanges. This General Plan has been designed to provide public access to Fort Ord Dunes for the enjoyment of its unique resources.

- 6-3 The California Department of Transportation requests that additional coordinating agencies be listed under General Plan/EIR Guidelines CIR-1 and CIR-12. As a staff-initiated text change and in response to Comment 6-3, page 3-35, paragraph 4 has been revised as follows:

CIR-1 Consider the transportation and circulation goals, guidelines, and traffic levels of service of the Fort Ord Reuse Authority (and applicable former Fort Ord military reservation land users), Marina, Seaside, Monterey

County, Transportation Agency for Monterey County, and Caltrans, Association of Monterey Bay Governments, California Coastal Commission, Coastal Conservancy, and other applicable agencies, ~~transportation and circulation goals, guidelines, and traffic levels of service~~ with respect to potential park entrances and travel corridors approaching entrances. Develop a **Circulation and Access Management Plan** to assess circulation, access (including beach access), and parking demands, in coordination with the plans of other agencies.

As a staff-initiated text change and in response to Comments 6-3 and 9-3, page 3-38, paragraph 1 has been revised as follows:

- CIR-12 Develop a **Unit Trails Plan** that would create opportunities for visitors to enjoy the unique and diverse topography, geology, biotic communities, and scenic values of the park. The actual location, distance, and use of future trails would be governed by this plan. Include specifications and policies concerning trail construction and maintenance, coordinated with soil erosion and sedimentation control measures. Incorporate design requirements from the Federal Architectural and Transportation Board Guidelines for Outdoor Developed Areas for public pedestrian access. Coordinate development of the Unit Trails Plan with applicable agencies, including but not limited to the Association of Monterey Bay Area Governments, the California Coastal Commission, the Coastal Conservancy, and the Transportation Agency for Monterey County’s Bicycle and Pedestrian Facilities Advisory Committee.

General Plan/EIR Table ES-1 includes several text modifications, based on clarifications recommended by Department staff and as a result of comments, such as this one. Due to the extent of revisions to this table, text revisions are not included within the comments and responses chapter, but may be reviewed in Chapter 3 of this document, within the Staff-initiated Text Changes section.

- 6-4 The California Department of Transportation requests that additional coordinating agencies be listed under General Plan/EIR Mitigation Measure tra-1. In response to Comment 6-4, page 4-53, paragraph 2 has been revised as follows:

**Mitigation Measure Tra-1.** Potential traffic circulation impacts should be reviewed at the project-level for specific facilities or management plans proposed under the Fort Ord Dunes State Park General Plan, and mitigation measures shall be implemented, including but not limited to:

- Concurrent with the planning and development of project level facilities and management plans, conduct a traffic study for the park's components in consultation with the Department of Transportation, Transportation Agency for Monterey County, and other appropriate jurisdictions. Elements of the traffic study would include, but not be limited to, the following: 1) project trip generation estimate; 2) roadway, intersection and freeway mainline operations and level of service analyses; 3) an onsite circulation and access analysis; and 4) provision of mitigation measures to reduce potential project traffic impacts. Project specific mitigation would be developed based and implemented on the results of these studies.

6-5 The California Department of Transportation indicates that future work or improvements within the State Route 1 right of way would require approval of an encroachment permit. While no future work or improvement within the Department of Transportation State Route 1 right of way is anticipated at this time, the Department would further review the California Department of Transportation requirements and recommendations during area- and site-specific planning, as appropriate.

6-6 The California Department of Transportation requests a copy of responses to their comments for this project, and copies of subsequent project notifications. All agencies commenting on the Fort Ord Dunes Preliminary General Plan/Draft EIR will receive a copy of the Response to Comments document. In addition, The Department of Transportation will be added to the project mailing list and will receive notices distributed to the project mailing list.

# MST

MONTEREY-SALINAS TRANSIT

**JOINT POWERS AGENCY MEMBERS:**

*City of Carmel-by-the-Sea • City of Del Rey Oaks • City of Marina • City of Monterey • City of Pacific Grove  
City of Salinas • City of Seaside • County of Monterey*

March 12, 2004

Mr. Jason Spann  
Project Coordinator  
Northern Service Center  
California Department of Parks and Recreation  
One Capitol Mall, Suite 500  
Sacramento, CA 95814

**RECEIVED**

**MAR 15 2004**

**NORTHERN SERVICE CENTER**

**RE: Fort Ord Dunes State Park  
Preliminary General Plan and  
Draft Environmental Impact Report**

Dear Mr. Spann:

Thank you for the opportunity to comment on the Fort Ord Dunes State Park Preliminary General Plan and Draft Environmental Impact Report. MST is pleased to see that the California Department of Parks and Recreation is calling for "...an emphasis on non-motorized forms of transportation, to and within the park, use of public transportation and establishment of shuttles as appropriate..." MST will also be able to assist in promoting the use of bicycles to and within the park since all of its vehicles are equipped with bike racks.

1

As indicated in the document, parking and road facilities will be designed to accommodate and encourage possible public transit service to interior park locations. To further that end, a copy of MST's *Designing for Transit* handbook has been enclosed. This guide provides information about transit-friendly design of communities, developments and other facilities. Additionally, it includes schematic drawings and exact roadway geometrics illustrating requirements for bus stops, shelters and other passenger amenities. Please utilize this document as you design the layout and circulation patterns of the Fort Ord Dunes State Park property and circulation pattern.

2

Because the park's entrance does not lie directly on an existing bus line, a rerouting and schedule revision will be required to fully meet the expected passenger demand. Due to MST's tight budgetary situation, we look forward to working with your planning staff to identify possible sources of funding to help pay for these additional bus service levels that would be required to properly serve the park.

3

Letter to J. Spann  
March 12, 2004  
Page 2 of 2

If you have any questions regarding the *Designing for Transit* handbook or these comments, please call me at your convenience at (831) 393-8129.

Sincerely

A handwritten signature in black ink, appearing to read "B. Hunter Harvath". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

B. Hunter Harvath, AICP  
Planning Manager

Enclosure

7 B. HUNTER HARVATH, MONTEREY-SALINAS TRANSIT

- 7-1 Monterey-Salinas Transit approves of the General Plan's emphasis on non-motorized forms of transportation and notes that its vehicles are equipped with bicycle racks, further promoting non-motorized transportation to the park. This comment is noted.
- 7-2 Monterey-Salinas Transit encourages use of their *Designing for Transit* for design and layout of circulation patterns at Fort Ord Dunes State Park. The Department would further review the Monterey-Salinas Transit recommendations during area- and site-specific park planning, as appropriate.
- 7-3 Monterey-Salinas Transit indicates that additional funding would be required to reroute bus lines to accommodate public transportation at proposed park entrances and visitor facilities. The Department would coordinate with the Monterey-Salinas Transit during area- and site-specific park planning, as appropriate.



**CITY MANAGER**

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March 11, 2004

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MAR 15 2004

NORTHERN SERVICE  
CENTER

Mr. Jason Spann, Project Coordinator  
California Department of Parks and Recreation  
Northern Service Center  
One Capitol Mall, Suite 500  
Sacramento, CA 95814

RE: FORT ORD DUNES STATE PARK PRELIMINARY GENERAL PLAN AND DRAFT ENVIRONMENTAL IMPACT REPORT

Dear Mr. Spann:

Thank you for the opportunity to comment on the preliminary General Plan and draft Environmental Impact Report for the Fort Ord Dunes State Park. The City of Seaside provides the following comments with respect to the documents:

1. The Park Support/Administrative Management Zone (Page 3-60) designates the 11-acre parcel east of Highway 1 bounded by 1<sup>st</sup> Street, 1<sup>st</sup> Avenue and Lightfighter Drive, as an area suitable for a park or multi-agency visitor center and a youth hostel, as well as visitor parking to support these facilities. The City of Seaside has had discussions with the State Parks and Recreation Department to trade the 11-acre site for the larger site on the south side of Lightfighter Drive between 1<sup>st</sup> Avenue and Gigling Road. The City is still interested in pursuing this possibility. For this reason, the City requests that the Environmental Impact Report and the General Plan consider and evaluate alternative sites for the multi-agency visitor center. Figures ES-1 (Page ES-8), 1-1 (Page 1-1), 1-2 (Page 1-2), 2-5 (Page 2-25), 3-2 (Page 3-48) and Table 3-5 (Page 3-61) could be amended to reflect alternative sites. In addition, Seaside requests that the discussion of the City of Seaside's General Plan designation on Page 2-67 also reflect the City's land swap proposal.
2. The City looks forward to having this facility on the Monterey Peninsula and supports its development. We also support the State's Regional Planning Goal found on Page 3-44 to ... "continue coordination with local land use agencies regarding transfer and/or acquisition of additional nearby property, or other cooperative land management agreements" and the Guidelines established for this coordination. In particular, REG-1 (Page 3-44) encourages multi-agency planning and coordination with local cities, Monterey County, universities, youth hostels and other land managers for locating park administration...or a visitor center on non-park lands nearby, particularly in previously developed and disturbed areas of the former Fort

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Ord military reservation located east of SR 1. We agree with this regional planning approach and look forward to cooperative efforts to address the administrative needs of the new park, the housing needs of the park employees and to create the multi-agency visitor center.

2  
cont.

Thank you again for the opportunity to comment on the draft General Plan and EIR for the Fort Ord Dunes State Park. Please feel free to contact me if you require additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Daniel E. Keen", with a long horizontal flourish extending to the right.

Daniel E. Keen  
City Manager

8 DANIEL E. KEEN, CITY OF SEASIDE

- 8-1 The City of Seaside requests that the General Plan/EIR discuss alternative sites for a multi-agency visitor center and that discussion of a potential land swap with the Department be added. The General Plan/EIR includes discussion of potential transfer and/or acquisition of additional nearby property, or other cooperative land management efforts on pages 3-44 through 3-45. Guidelines within this section include Guideline REG-4, calling for consideration of a regional multi-agency visitor center, which could be located within Fort Ord Dunes State Park lands or within the jurisdiction of a cooperative agency, should such an agreement be reached.

The General Plan can only designate potential land uses for lands that would be under California Department of Parks and Recreation jurisdiction (i.e., the future Fort Ord Dunes State Park lands). In conducting the evaluation of constraints and use potential for Fort Ord Dunes, it was determined that the only suitable locations for a visitor center within Fort Ord Dunes would be the 8th Street Management Zone (visitor center/kiosk) and Park Support/Administration Management Zone lands located east of State Route 1 (park or multi-agency visitor center). It is acknowledged that the City of Seaside and the Department are considering a land swap that includes the Park Support/Administration Management Zone lands located east of State Route 1, and should this action occur, the Department would only consider a visitor center within the 8th Street Management Zone, as described in the General Plan/EIR (pages 3-53 through 3-55), or would seek to develop cooperative or other agreements to develop a park or multi-agency visitor center on non-park lands (as described in Guidelines REG-1 and REG-4).

- 8-2 The City of Seaside provides support for development of the Fort Ord Dunes State Park and guidelines calling for coordinated regional planning. This comment is noted.



Regional Transportation Planning Agency • Congestion Management Planning  
Local Transportation Commission • Monterey County Service Authority for Freeways & Expressways

March 11, 2004

Mr. Jason Spann  
Project Coordinator  
California Department of Parks and Recreation  
Northern Service Center  
One Capitol Mall, Suite 500  
Sacramento, CA 95814

**RECEIVED**  
**MAR 15 2004**  
**NORTHERN SERVICE CENTER**

**SUBJECT: TAMC Comments on the Fort Ord Dunes State Parks Preliminary General Plan Draft Environmental Impact Report**

Dear Mr. Spann:

Our agency has reviewed the Fort Ord Dunes State Parks Preliminary General Plan Draft Environmental Impact Report. The Transportation Agency for Monterey County (TAMC) serves as the Regional Transportation Planning Agency (RTPA) and the Congestion Management Agency (CMA) for Monterey County. TAMC has reviewed the report and offers the following comments:

- 1. TAMC is pleased to be included in **CIR-1** as a collaborative agency. Close collaboration with TAMC and Caltrans in the development of the **Park Circulation and Access Management Plan** will ensure the maximum visitor experience desired. | 1
- 2. TAMC praises the promotion of the use of alternate modes of transportation to access the park as mentioned in **CIR-9**. | 2
- 3. TAMC commends the trails element of the draft EIR. TAMC's Bicycle and Pedestrian Facilities Advisory Committee would like to be included in the development of the **Unit Trails Plan** to provide the maximum safe connection with other existing regional trails. | 3
- 4. TAMC would like to see the development of the north south connector trail for pedestrian and bicycle use as mentioned in **CIR-16** as soon as it is feasible to construct. TAMC suggests changing the language of **CIR-16** to read "Provide for development of a north south connector trail...", ensuring that the connector trail will be developed first and not later as part of the Unit Trails Plan. | 4
- 5. TAMC would like to be included in the list of agencies consulted in **REG-2**. TAMC is set to receive 15 acres of land from the Army adjacent to the Fort Ord Dunes State Parks site, | 5

and TAMC currently owns the railroad right-of-way along the easterly boundary of the park. In the spirit of the policy TAMC supports the careful coordination with other agencies to ensure that all concerns are addressed, to the extent feasible.

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cont.

6. TAMC commends the collaborative approach outlined in **NR-6** regarding development in close proximity to the Natural Resource Zone. TAMC will coordinate closely with State Parks in the development of environmental documents regarding any potential development in that area.

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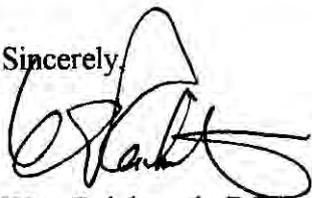
7. TAMC requests that there be no public access inside the balloon spur that is identified as part of the **PSA zone**. All public parking and public access related to that zone should be located on the east side of highway one. The potential train turn around use of the balloon spur is incompatible with public use.

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We appreciate the opportunity to review this document. We would like to request that any subsequent documentation on this project be forwarded to us for review. If you have any questions, please contact Andy Cook of my staff at (831) 775-0903.

8

Sincerely,



Wm. Reichmuth, P.E.  
Executive Director

- cc: Dave Murray, California Department of Transportation (Caltrans), District 5  
Nicolas Papadakis, Association of Monterey Bay Area Governments  
Douglas Quetin, Monterey Bay Unified Air Pollution Control District (MBUAPCD)  
Frank Lichtanski, Monterey-Salinas Transit (MST)  
Michael Houlemard, FORA  
Charles Johnson, City of Marina  
Diana Ingersoll, City of Seaside  
TAMC Board of Directors, via enclosure to Board packet

9 WM. REICHMUTH, TRANSPORTATION AGENCY FOR MONTEREY COUNTY

- 9-1 The Transportation Agency for Monterey County provides support for General Plan/EIR Guideline CIR-1, which includes the transportation agency as a collaborative agency. This comment is noted.
- 9-2 The Transportation Agency for Monterey County provides support for use of alternate modes of transportation, as called for in the General Plan/EIR. This comment is noted.
- 9-3 The Transportation Agency for Monterey County provides support for the trails element of the General Plan/EIR, and requests the inclusion of their Bicycle and Pedestrian Facilities Advisory Committee in development of the Unit Trails Plan. As a staff-initiated text change and in response to Comments 6-3 and 9-3, page 3-38, paragraph 1 has been revised as follows:

CIR-12 Develop a **Unit Trails Plan** that would create opportunities for visitors to enjoy the unique and diverse topography, geology, biotic communities, and scenic values of the park. The actual location, distance, and use of future trails would be governed by this plan. Include specifications and policies concerning trail construction and maintenance, coordinated with soil erosion and sedimentation control measures. Incorporate design requirements from the Federal Architectural and Transportation Board Guidelines for Outdoor Developed Areas for public pedestrian access. Coordinate development of the Unit Trails Plan with applicable agencies, including but not limited to the Association of Monterey Bay Area Governments, the California Coastal Commission, the Coastal Conservancy, and the Transportation Agency for Monterey County's Bicycle and Pedestrian Facilities Advisory Committee.

General Plan/EIR Table ES-1 includes several text modifications, based on clarifications recommended by Department staff and as a result of comments, such as this one. Due to the extent of revisions to this table, text revisions are not included within the comments and responses chapter, but may be reviewed in Chapter 3 of this document, within the Staff-initiated Text Changes section.

9-4 The Transportation Agency for Monterey County requests commitment for development of a north south connector trail as soon as it is feasible. See the response to Comment 5-11 regarding General Plan funding, implementation, and phasing. In response to Comment 9-4, page 3-38, paragraph 5 has been revised as follows:

CIR-16 Allow for development of a north-south connector trail for pedestrian and bicycle use. This connector trail segment is recognized as an important and high priority project by local agencies. Consider ways to separate pedestrian and bicycle uses from vehicular use. When this is infeasible, use traffic management strategies to slow vehicular traffic. Provide bike lanes along roads.

9-5 The Transportation Agency for Monterey County requests inclusion in the list of agencies consulted under Guideline REG-2. While Guideline REG-2 addresses “other agency plans and proposed land uses within, adjacent to, and near Fort Ord Dunes” without specifically listing all applicable agencies, the guideline will be modified as requested. In response to Comment 9-5, page 3-44, paragraph 4 has been revised as follows:

REG-2 Consider existing and future Fort Ord Reuse Authority, Seaside, Marina, Monterey County, Transportation Agency for Monterey County, and other agency plans and proposed land uses within, adjacent to, and near Fort Ord Dunes as related to compatibility and capacity of potential Fort Ord Dunes uses. Planning and development should be carefully coordinated with other agencies to assure that all concerns are addressed, avoiding cumulative impacts to the extent feasible.

General Plan/EIR Table ES-1 includes several text modifications, based on clarifications recommended by Department staff and as a result of comments, such as this one. Due to the extent of revisions to this table, text revisions are not included within the comments and responses chapter, but may be reviewed in Chapter 3 of this document, within the Staff-initiated Text Changes section.

9-6 The Transportation Agency for Monterey County provides support for coordinated planning related to development in the vicinity of the Natural Resource Management Zone. This comment is noted.

- 9-7 The Transportation Agency for Monterey County requests that no public access occur within the balloon spur portion of the Park Support/Administration Management Zone, which is located west of State Route 1. This comment is consistent with the description of the Park Support/Administration zone (General Plan/EIR pages 3-60 through 3-62), which indicates that public access and use would occur only in portions of the zone that are located east of State Route 1. However, the Department does recognize that operational facilities located within the balloon spur may draw public attention and the Department would coordinate with all appropriate agencies to ensure public safety, as called for in Public Safety and Law Enforcement guidelines PUB-4 and PUB-7 and Regional Planning guidelines REG-1 through REG-3.
- 9-8 The Transportation Agency for Monterey County requests that any subsequent documentation on the Fort Ord Dunes State Park General Plan/EIR project be forwarded for their review. All agencies commenting on the Fort Ord Dunes Preliminary General Plan/Draft EIR will receive a copy of the Response to Comments document. In addition, the Transportation Agency for Monterey County will continue to receive notices distributed to the project mailing list, as they have throughout this planning process.



# United States Department of the Interior



FISH AND WILDLIFE SERVICE  
Ventura Fish and Wildlife Office  
2943 Portola Road, Suite B  
Ventura, California 93003

IN REPLY REFER TO:  
PAS 201.398.1659

March 12, 2004

**RECEIVED**

**MAR 15 2004**

**NORTHERN SERVICE CENTER**

Jason Spann  
Project Coordinator  
California Department of Parks and Recreation  
Northern Service Center  
One Capitol Mall, Suite 500  
Sacramento, CA 95814

Subject: Fort Ord Dunes State Park Preliminary General Plan and Draft  
Environmental Impact Report

Dear Mr. Spann:

We have reviewed the Fort Ord Dunes State Park Preliminary General Plan and Draft Environmental Impact Report (DEIR) dated January 2004. You have prepared this document to guide the management of the future 990-acre Fort Ord Dunes State Park, which the Department of the Army (Army) is expected to transfer to the Department of Parks and Recreation (State Parks) in the near future.

We have been involved in resource issues related to these coastal lands for more than a decade, through consultations with the Army on the cleanup, closure, and reuse of former Fort Ord and, more recently, in the planning process for former Fort Ord's comprehensive Habitat Conservation Plan (HCP). The following federally listed species occur on the future Fort Ord Dunes State Park: the endangered Smith's blue butterfly (*Euphilotes enoptes smithi*), and Monterey (sand) gilia (*Gilia tenuiflora* ssp. *arenaria*), and the threatened western snowy plover (*Charadrius alexandrinus nivosus*) and Monterey spineflower (*Chorizanthe pungens* var. *pungens*). The lands also support designated critical habitat for the western snowy plover and the Monterey spineflower. The endangered Yadon's wallflower (*Erysimum menziesii* ssp. *yadonii*) was reintroduced to the parcel during restoration by State Parks. The following species, while not listed, are considered "covered species" in the draft HCP for former Fort Ord and occur at Fort Ord Dunes State Park: the black legless lizard (*Anniella pulchra nigra*), coast wallflower (*Erysimum ammophilum*), Monterey ceanothus (*Ceanothus cuneatus* var. *rigidus*), and sandmat manzanita (*Arctostaphylos pumila*).

We offer the following comments to aid you in planning for the conservation of listed and sensitive wildlife and plant species that could be affected by your proposed plan, and as a means to assist you in complying with pertinent Federal statutes. These comments are prepared in accordance with the Endangered Species Act of 1973, as amended (Act), and other authorities mandating Department of Interior concern for environmental values.

1. We commend your preparation of a plan that promotes the restoration and protection of an important coastal ecosystem. Your plan appears consistent with the 1997 Installation-wide Multispecies Habitat Management Plan for Former Fort Ord (HMP). We note that it does not preserve the distinction, present in the HMP, of the “coastal dune zone” as opposed to the “disturbed habitat zone.” Your plan’s more condensed areas of development are an improvement over the broader regions defined in the HMP. However, you should ensure your plan maintains biological corridors along the length of the Fort Ord Dunes State Park parcel. We note that two of your defined development zones (8<sup>th</sup> Street Zone and Storage Bunker Zone) extend from the Beach Range Road west to the coastal bluffs. We recommend a corridor of undeveloped, restored, native vegetation be defined and maintained through these areas to provide connections for dispersal and movement of listed and sensitive species between different regions of the Natural Resource Zone. 2  
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2. We recommend that you use the general plan as the basis for revisions to the State Park section of the Fort Ord HCP. For the HCP, you will need more detail than is currently present in the proposed general plan and DEIR. This is particularly important if the construction and use of the visitor-serving facilities proposed in the plan (or some subset of them) are to be included as HCP covered activities. Facilities that will promote increased visitation of the dunes and beaches have the potential to adversely affect the Smith’s blue butterfly, western snowy plover, and listed dune plants, far beyond the footprint of the defined visitor-oriented management zones. We provide a few comments below, to assist with revisions for the HCP. Please also refer to our November 13, 2003, comments on the draft Fort Ord HCP for other recommendations related to revising the HCP section addressing the future Fort Ord Dunes State Park. 4
  - a) BIO-1 and BIO-9 refer to monitoring that will be conducted “...to the extent feasible...” For the HCP, monitoring of covered species should be fully described, and is typically required, for the incidental take permit to remain valid.
  
  - b) We would like to work with you further to develop the Western Snowy Plover Management Program referred to in BIO-3 and the Vegetation Management Plan referred to in BIO-7. For the western snowy plover, we recommend you identify the most likely nesting areas along the beach (for instance, at the north and south ends of the parcel) and restrict visitor access to those areas from the outset, using signage or symbolic fencing and perhaps including a walking corridor at the surf line. We do not recommend a program which waits until nesting western snowy 5

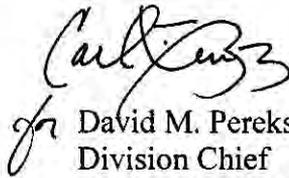
|   |            |
|---|------------|
| plovers are located before restricting public access, as pairs may be discouraged from initiating a nest due to visitor use.  | 5<br>cont. |
| c) Dogs can destroy nests of western snowy plovers, flush brooding adults, and kill chicks. The reference in BIO-18 to the California Code of Regulations should indicate that dogs will not be allowed on beaches or outside campgrounds and roads.  | 6          |
| d) We support your vision that natural resources will be the foremost consideration for all land use and management decisions in the 785-acre Natural Resource Management Zone.   | 7          |
| 3. We agree with your proposal to place developed visitor use areas, such as parking and picnic areas, in the central region of the parcel, at locations where roads, parking areas, and other military structures already exist. The north and south regions of the dunes are of particular value to listed species. The north region of the parcel supports the only known populations of Monterey gilia on the site. The greatest abundance of Smith's blue butterfly and its host plant occur in the northern and southern regions. The most appropriate nesting habitat for the western snowy plover also likely occurs at the north and south ends of the Fort Ord Dunes parcel. Maintaining these areas free of beach access points will increase the likelihood of successful breeding by western snowy plovers and provide protection for other populations of listed and sensitive species.   | 8          |
| 4. Chapter 2, Existing Conditions and Issues, provides little information on the current distribution of special status species other than the western snowy plover. Because the habitat values of the dunes have been reduced by military use and invasive nonnative iceplant on much of the future park, it is important to preserve those populations of listed and sensitive species that still remain on the dunes, such as Monterey gilia and Smith's blue butterfly. We recommend you include a discussion and map of the current known distribution of the other special status species to show their locations in relation to the management zones where you propose campgrounds, picnic areas, and day-use parking.   | 9          |
| 5. Chapter 4 of the DEIR should more thoroughly assess the impacts of the plan on special status species and their habitats in the park. Impacts Bio-1 and Bio-2 specifically address construction and footprint impacts of new facilities and should be titled to clarify this. Both should include more comprehensive analyses of the potential effects of the maximum proposed development of parking areas and camp sites, given the known existing locations of special status species such as Smith's blue butterfly, western snowy plover, and Monterey spineflower. Impact Bio-3 should more thoroughly and specifically address the effects of increased public access on listed and sensitive species, as this may be the most difficult impact to control and can preclude or disrupt breeding of the western snowy plover and lead to trampling and burial of populations of special status plant species and host plants for the Smith's blue butterfly. | 10         |

6. We recommend you reconsider the minimal facility alternative described in Chapter 4. Although your proposed plan is generally consistent with the HMP and draft HCP, both the minimal facility alternative and the minimal use facility would likely reduce conflicts between visitor use and listed and sensitive species.

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We appreciate the opportunity to comment on your preliminary general plan and DEIR. We look forward to working with you further as you revise your general plan and the HCP section that addresses the future Fort Ord Dunes State Park. If you have any questions about these comments, please contact Diane Steeck, of my staff at (805)644-1766.

Sincerely,



David M. Pereksta  
Division Chief  
Santa Cruz/San Benito/Monterey

10 DAVID M. PEREKSTA, U.S. FISH AND WILDLIFE SERVICE

10-1 The U.S. Fish and Wildlife Service lists federally listed species that occur or could occur at the future Fort Ord Dunes State Park. The special-status species list provided by the U.S. Fish and Wildlife Service is consistent with those species addressed in the General Plan/EIR (see Tables 2-5 and 2-6 in particular).

10-2 The U.S. Fish and Wildlife Service supports the General Plan/EIR's promotion of coastal ecosystem restoration and protection, and notes the consistency of the General Plan/EIR with the *Installation-wide Multispecies Habitat Management Plan for Former Fort Ord, California*. This comment is noted.

10-3 The U.S. Fish and Wildlife Service recommends inclusion of an established habitat corridor within the 8th Street and Storage Bunker Management Zones. The management zones do not designate specific sites for development of specific facilities or determine the number of facilities to be developed. Area- and site-specific management zone development would be analyzed, designed, and implemented on a project specific basis. While habitat restoration areas or habitat corridors have not been designated for the management zones, it is noted that areas of zones that are not proposed for development during area- and site-specific planning would be restored to a natural condition. See the General Plan/EIR description of management zones (pages 3-53, 3-57, 3-59, and 3-60). Also see Staff-initiated Text Changes in Chapter 3 of this document for further clarification of Guideline BIO-6. Further, the parkwide management goals and guidelines included in the General Plan/EIR emphasize habitat connectivity and establishment of biocorridors. See for example, Guideline BIO-7, calling for re-establishment of habitat corridors; Guideline BIO-8, calling for preservation of large areas of coastal dune habitat, creating large areas of connected habitat; Guidelines BIO-12 through BIO-15 addressing interconnecting biocorridors; and Guideline REG-7, which includes potential contributions to biocorridors as consideration for future land acquisition or transfer. Biocorridor functions and habitat connectivity between management zones, in compliance with these management guidelines, would be addressed further during area- and site-specific management zone development.

10-4 The U.S. Fish and Wildlife Service recommends use of the General Plan as the basis for revisions to the State Park section of the *HCP Supplement to the Installation-wide Multispecies Habitat Management Plan for Former Fort Ord, California* and recommends details that should be included in the

HCP. The HCP is being prepared as a separate planning effort, under the management of the Fort Ord Reuse Authority and no further response is required for this Response to Comments on the Preliminary Fort Ord Dunes General Plan/Draft EIR. However, it is noted that the Department would continue to coordinate with the Fort Ord Reuse Authority, and other agencies, as appropriate, regarding regional natural resources planning, including the basewide HCP.

- 10-5 The U.S. Fish and Wildlife Service requests inclusion as a coordinating agency for development of programs and plans referred to in Guidelines BIO-3 and BIO-7. The Department would further review recommendations provided regarding details of the Western Snowy Plover Management Program during preparation of that program. In response to Comment 10-5, page 3-14, paragraph 6 has been revised as follows:

BIO-3 Establish a **Western Snowy Plover Management Program** to monitor and protect nesting areas and activities, and to establish appropriate levels of public access to these areas. When determined necessary, implement appropriate supplemental measures, such as erection of exclosures, and predator control, in accordance with the Department's "Western Snowy Plover Systemwide Management Guidelines," and as necessary through consultation with regulatory agencies and local experts, including the U.S. Fish and Wildlife Service.

In response to Comment 10-5, page 3-15, paragraph 5 has been revised as follows:

BIO-7 Prepare a long-term **Vegetation Management Plan** that addresses restoring native dune habitats. Coordinate development of the plan with the U.S. Fish and Wildlife Service and other agencies, as appropriate. The Vegetation Management Plan should consider incorporation of science-based management of natural and restored habitat to the maximum extent feasible, and address ecosystem processes. The Vegetation Management Plan should include specific goals and guidelines and could address the following topics, but is not limited to:

- Continuing restoration of natural processes, topography, native dune vegetation restoration, and exotic plant management.
- Re-establishing habitat corridors
- Developing and managing non-native plant species and replacing with native plants; priority given to most invasive and conspicuous species within the park
- Controlling non-native predators, such as feral cats and dogs
- Reintroducing key animal species where feasible
- Creating buffers between habitats and high use areas
- Continuing ongoing biological monitoring
- Educating the public about natural plant and animal communities

General Plan/EIR Table ES-1 includes several text modifications, based on clarifications recommended by Department staff and as a result of comments, such as this one. Due to the extent of revisions to this table, text revisions are not included within the comments and responses chapter, but may be reviewed in Chapter 3 of this document, within the Staff-initiated Text Changes section.

10-6 The U.S. Fish and Wildlife Service requests further clarification of requirements listed in Guideline BIO-18. In response to Comment 10-6, page 3-17, paragraph 8 has been revised as follows:

BIO-18 Control domestic dogs accompanying visitors to the park in accordance with the terms of California Code of Regulations Title 14, Division 3, Section 4312 (Control of Animals) or as otherwise permitted by the Department. Section 4312 lists several requirements, including restricting dogs to the limits of campgrounds, picnic areas, parking areas, roads, etc.; restricting dogs from beaches; and requiring leashes.

10-7 The U.S. Fish and Wildlife Service supports the General Plan/EIR's vision that natural resources be the foremost consideration for planning within the Natural Resource Management Zone. This comment is noted.

- 10-8 The U.S. Fish and Wildlife Service supports the General Plan/EIR's proposal to locate developed visitor use areas within centralized park management zones; with large areas in the north and south portions of Fort Ord Dunes managed to preserve and protect the sensitive resources located there. This comment is noted.
- 10-9 The U.S. Fish and Wildlife Service requests further information regarding the distribution of special-status Species within Fort Ord Dunes. Baseline scientific studies used to develop and evaluate "The Plan" are listed in General Plan/EIR Appendix B, Literature Consulted. These include studies on the distribution special-status species, vegetation, animals, and other park natural resources. Baseline data are also found in the form of maps and geographic information system analysis. All biological and natural resource data presented in the EIR are based on scientific principals including field reconnaissance, review and analysis of existing literature, consultation with agency and local experts, and extensive review by Department and consultant resources staff. Detailed location information for special-status species and other sensitive natural resources was intentionally omitted from the EIR to promote protection and discourage harm, collection, or other damage.<sup>1</sup> However, the General Plan analysis of key elements posing constraints or potential considered the known locations of sensitive biota and natural resources. The analysis of special-status species sensitivity primarily relied on data from the California Department of Fish and Game, *California Natural Diversity Data Base for 7.5 Minute Topographic Quadrangle (Marina)*, which indicates both specific special-status populations and general population areas. Typically, management zones were designed to exclude areas of biological sensitivity, with appropriate buffers, from development oriented management zones where frequent visitor use is anticipated and maximize inclusion of known special-status species and sensitive habitat areas within a management zone that includes minimal facilities development and low visitor use.

The data provided in the EIR are appropriate given the programmatic nature of the document (i.e., the plan does not prescribe specific actions). While the management zone analysis sought to minimize inclusion of special-status species from zones where frequent visitor use is anticipated, the more 'active' zones include some small areas of known special-status species sensitivity. However, it is noted that the Department does not intend to site park facilities and uses through out each of the active management zones, but has identified management

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<sup>1</sup> Reports referenced in the bibliography are available (for a copying fee) from the Department, or are readily available at libraries, through the internet, and through other repositories.

zones that consider the presence of natural, cultural, and social resources, as well as physical connections, such as existing roadways, that allow for useful land management units. Area- and site-specific planning and survey would be required to identify specific populations within zones and recommend site design and use strategies to minimize disturbance of these populations, as well as appropriate mitigation. In addition, areas of management zones that are not proposed for development would be restored to natural condition, as noted above. Since the decision made under the General Plan/EIR is programmatic and no specific commitment of resources is made by the decision, the level of detail presented is appropriate.

10-10 The U.S. Fish and Wildlife Service requests more detailed analysis of special-status species impacts, including the effects of construction activities and the effects of use of public access areas. The analysis and data provided in the EIR are appropriate given the programmatic nature of the document (i.e., the plan does not prescribe specific actions). As described in the response to Comment 10-9 above, the General Plan includes management zones specifically designed to avoid placement of facilities and public uses in areas of resource sensitivity. Further, the Management Plan includes guidelines and mitigation measures to be implemented during site specific facility siting, construction, and use (see General Plan/EIR pages 4-28). In addition, upon conveyance of Fort Ord Dunes, the Department would be required to meet the habitat protection requirements established for the Fort Ord Dunes property (General Plan/EIR Guideline BIO-5, calling for compliance with the basewide HMP and Draft HCP). Since the decision made under the General Plan/EIR is programmatic and no specific commitment of resources is made by the decision, the level of detail presented in the General Plan/EIR is appropriate.

An overriding assumption of the Fort Ord Dunes General Plan/EIR is that future site-specific actions that could occur based on the General Plan would themselves be analyzed as required by CEQA, the Endangered Species Act, and other applicable regulations and guidelines, and that all state and federal laws will be complied with during implementation. The area- and site-specific planning would include implementation of the guidelines and mitigation measures described on General Plan/EIR and recommend more detailed site and implementation planning, as well as additional mitigation measures, as required, to reduce potential impacts to special-status species and their habitat at the project level.

Clarification regarding the impacts discussed under Impacts Bio-1 and Bio-2 has been addressed. In response to Comment 10-10, page 4-23, paragraph 4 has been revised as follows:

**Impact Bio-1. Potential Construction Phase Effects to Native Habitats and Species**

Implementation of the proposed General Plan could allow new land uses, new facilities and improvements to existing facilities, and could result in an effect on native habitats and species. Localized, minor, short-term, temporary effects on native vegetation could occur from construction activities (e.g., potential visitor center/kiosk, day-use and/or overnight parking lots, trail development and other new facilities). Effects would be related to heavy equipment and construction activities and could include soil compaction, dust, vegetation removal, wildlife harassment or mortality, root damage, erosion, and introduction and spread of non-native species. Construction effects on native habitats and species may be site-specific short-term and long-term negative effects. The development zones, i.e., 8th Street, 1st Street, and Storage Bunker Zones, could require removal of primarily disturbed plant communities, including disturbed dunes and ice plant dominant communities. Potential removal of these communities within development zones would not negatively affect native habitat; however, the majority of these areas will be developed and would not benefit native habitats and species.

As a staff-initiated text change and in response to Comment 10-10, page 4-25, paragraph 5 has been revised as follows:

**Impact Bio-2. Potential Construction Phase Effects on Special-status Species**

Implementation of the proposed General Plan could allow new land uses, new facilities and improvements to existing facilities, and could result in effects on special-status species, including Smith's Blue butterfly, globose dune beetle, black legless lizard, special-status bats and birds, Western snowy plover and several special-status plant species. The 8th Street and 1st Street Zones contain medium density and low density Monterey spineflower populations, respectively. Localized, minor, short-term to long-term effects on special-status species could occur from construction of potential facilities and/or actions. Effects would be related to night lighting

during operations, trampling, dust, heavy equipment, and construction activities and could result in direct removal of habitat, harassment or mortality, and introduction and spread of non-native species.

10-11 The U.S. Fish and Wildlife Service recommends reconsideration of the minimal facility and minimal use alternatives. As noted by the U.S. Fish and Wildlife Service and in the General Plan/EIR (see pages 4-61 through 4-63), the Minimal Use and Minimal Facility alternatives would avoid some of the potential impacts related to construction and operation of potential future park uses associated with the proposed Plan. However, the impacts of implementation of The Plan can be reduced to less than significant at the program level with measures identified in the EIR and no unavoidable significant impact would result. While the Minimal Use and Minimal Facility alternatives would respond to most or all of the basic goals and objectives of the project, the Preferred Plan would provide greater enhancement of recreational opportunities while avoiding significant resource impacts. Implementation of the General Plan would require area- and site-specific planning that would determine detailed facilities with specific size, design, and locations, as well as specific use capacities. Further, implementation of plan elements would occur in phases and ultimate park development could incorporate some elements of the minimal use and minimal facility alternatives, if deemed appropriate during area- and site-specific planning or if required by funding or regulatory permitting requirements.

RECEIVED

13 March 2004

MAR 15 2004

TO: Mr. Jason Spann and other Parks Planners, Staff and Consultants  
FROM: Dr. Suzanne Worcester, Biology Professor at Cal State Monterey Bay  
RE: Comments on DEIR Fort Ord Dunes Preliminary General Plan

Dear Mr. Spann and other State Parks Staff and Consultants,

Overall I think the Preliminary General Plan represents an excellent compromise between State Parks goals for greater visitor services and local citizen concerns with the future of the Fort Ord Dunes. Although I personally prefer the Minimal Use Alternative or the Minimal Facilities Alternative, this plan does include many improvements over past preferred versions. The improvements outlined in this document will lead to fewer environmental impacts than earlier visions of the park.

As a professor in the Division of Science and Environmental Policy, I have been leading student projects for the past three years monitoring the success of the biological restoration at the Fort Ord Dunes following lead remediation. I am familiar with nearly the entire park, and have developed expertise on the locations and survival of the special status plants on the Fort Ord dunes. With this expertise in mind, the preferred plan is well set up to protect most areas of sensitive habitat (depending on specific plans for boardwalk locations, etc. in the future).

Below I've outlined specific comments for further consideration by the planning team.

**Executive Summary – ch. 1**

*Reg-1, p. ES-7*

I applaud the Parks planning staff and consultants for listening to past public comments about including an RV park and lodging on the west side of SR 1. Regional Planning goal number 1 is a much better idea that still includes State Parks vision of offering a varied number of services to visitors (by providing the opportunity for only a hostel on the east side of SR 1), yet does not include the negative impacts of RV camping and lodging in the park proper.

1

**Existing Conditions – ch. 2**

*Regional Faults*

San Andreas fault is located to the east not the southwest as indicated on 2-14. My understanding is that there are active portions both to the northeast and the southeast.

2

*Biotic Resources*

Although ice plant dominates much of the Fort Ord dunes, the description of existing biotic conditions on pp. 2-23, second paragraph under Biotic Resources understates existing conditions. In the undisturbed areas outside of lead remediation sites, in multiple places native vegetation comprises 30-50% of the existing vegetation in most areas. Thus this section should be revised to state something about significant pockets of native vegetation still exist in this Coastal Dune Zone. Further restoration is needed of course, and ice plant does dominate throughout the park, however the description in the DEIR suggests there is nothing worth saving. If needed, I can provide specific percent cover values for native and exotic species in many areas of the Fort Ord dunes outside the lead remediation areas.

3

**The Plan – ch. 3**

*HYD-6 on p.3-9*

I would suggest stronger language than “considering water conserving design and equipment in new facilities” – this should be “require water conserving equipment and design in facilities in most cases”. I recognize that state requirements are often lesser than local municipal requirements, however, for such a precious resource State Parks should take a lead in the community. Similarly the 3<sup>rd</sup> bullet should be “require water conserving devices”.

4

*GEO-3 on p.3-11*

I appreciate the focus on using non-structural protective measures. However it suggests if structures are created then they should not adversely affect shoreline processes or significantly increase erosion. I think it may be nearly impossible to build a structure on the beach that would not lead to coastal erosion elsewhere.

5

*NOI-2 on p. 3-13*

One option that would reduce noise pollution associated with camping would be to have traditional campsites with no hook-ups or electricity. If it is tent-only camping then this would be relatively easy. Earlier versions of the plan had a focus on “environmental camping” which has walk-in sites. I suggest putting that emphasis back into the plan.

6

*BIO-13 on p.3-17*

Editorial change are needed. BIO-13 is repeated three times with only the last one being what I think was the intended version. The list then skips to BIO-18.

7

*Natural Resource Zone*

The extensive natural resource zone is excellent. In particular including all of the northern and southern parts of the park in this zone is great. These areas have some of the greatest concentrations of rare species within restored habitat and natural habitat.

One overall concern is how to maintain buckwheat plants in corridors throughout the three developed zones (to provide dispersal corridors for the Smith’s Blue Butterfly). In particular the Storage Bunker zone is already and will continue to be, as described in the plan, an extensive area nearly devoid of buckwheat plants. I would suggest that a concerted effort to plant buckwheat throughout this bunker zone (particularly along the eastern side of the dunes) be implemented. This would provide a more contiguous corridor. This would help to increase Smith’s blue butterfly populations, and provide the corridors described in the Unit Plan.

8

*Lead management in 1<sup>st</sup> St. zone pp. 3-55 to 3-57*

Given that Range 8 (the old firing range in the 1<sup>st</sup> St. Zone) is a large disturbed area, it makes sense to develop it for visitor use. However it needs additional cleanup before it can be opened to the public. Even though the area described for visitor use is not an area of large (obvious) lead clean-up, the area just to the west of the dune that was used as a firing range is still littered with bullets, metal fragments and wooden boards. The most potentially lead-contaminated area is to the southwest of the firing range in a disturbed flat area nearly devoid of ice plant. The current management zone map does not include beach access from the First St. Zone. However, knowing human behavior, if there is a parking lot, people will head to the beach. Besides the potential lead contamination issue along likely routes to the beach, the route that currently seems easiest

9

to head over the firing range dune toward the beach is covered with quite a bit of Monterey spine flower. Spineflower prefers disturbed areas and it seems to be recovering very well along this trail. Possibly an alternate route to the beach could be found from the vista point across the ice plant dominated ridge and down around the potentially lead-contaminated dune flat. However this route puts the public closer to a successful restoration area that includes many buckwheat plants in Range 6. Overall I would suggest additional lead testing west of the firing range prior to opening this area to visitor use (in keeping with you planning goal, HAZ-2). Note Mitigation Measure Haz 1, p. 4-37, does not specifically describe how lead will be managed at the one firing range that will be developed. In particular Mitigation Measure Haz 1 seems to focus on construction-related activities only and not on-going interactions of the public at this site in particular. Given the past use of the dunes for military target practice, a broader lead management plan would be in order.

9  
cont.

*Storage Bunker Zone pp. 3-57 to 3-59*

The Storage Bunker zone is a logical choice for development due to its relatively large width (west to east) and dominance by ice plant. However in keeping with the aesthetic and noise reduction goals in this plan, it seems that having up to 110 camping spaces is a bit excessive. Having only 50 camping spaces seems more in line with these other goals. In addition, during earlier drafts there had been an emphasis on environmental camping where not every camp site would have a parking space. This aspect seems to have disappeared in this version of the plan and I think some fraction of the camp sites should be of this type (to minimize noise, cars, impervious surfaces built, etc.).

10

*Park Support/Administrative Zone pp. 3-60 to 3-62*

I commend the development team for removing the proposed development of a hotel and moving the proposed development of a hostel to the east side of SR 1. Both of these moves will increase the aesthetic value of the park and were in line with public feedback.

11

**Chapter 4 "Environmental Analysis"**

*Water Resources*

The plan suggests there will be no impact on water resources. Yet the campground, restrooms, a possibly Visitor Center, fire hydrants, etc. will all require water resources. No mention was made of the water allotment to State Parks on Fort Ord by FORA. There was also no estimate of how much water would be used by these facilities. Even though these facilities will use much less water than say a housing development, water resources will be used. An assessment of the expected water use should be in the EIR.

12

*Mitigation Measure Air-1, p. 4-18*

While it is important to reduce dust during construction activities, it is important that these measures be consistent with other aspects of the general plan. For instance, hydroseed often includes non-native grass seeds. Exotic annuals are currently invading the areas restored after lead remediation activities. Thus hydroseed mixes would need to be created carefully to include natives and/or exotics that are known not to reseed in dune habitats in CA (although the latter is risky). Otherwise hydroseeding would be at odds with the natural resources goals in this plan. Such hydroseed mixes would need to be

13

checked regularly as some construction firms, etc. are not familiar with reducing exotics and may incorporate traditional hydroseed mixtures. Guidelines for hydroseeding with natives should be included in this General Plan EIR.

13  
cont.

*Mitigation Measure Air2, p. 4-21 and 4-22*

An additional bullet that should be added under mitigation measures is to ensure adequate pedestrian and bicycle access by local visitors. These measures may include opening the access by pedestrians or bicycles from Lake Court in Marina and Seaside near the Fremont/SR interchange. In addition renovating the tunnels under SR1 at 1<sup>st</sup> St. to be pedestrian/bicycle friendly would be an appropriate measure. This may include installing lighting for safety and appropriate signage and road painting to ensure safety of pedestrians since bicycles also use the same tunnel. The plan already mentioned adding pedestrian and bicycle lanes along the 8<sup>th</sup> St. overpass, which will help as well.

14

*Mitigation Measure Hyd-1, p. 4-42*

This measure was not explicitly linked to the various GEO goals that require limiting erosion. Given that past storm water outfalls on the Fort Ord dunes have led to substantial coastal erosion, efforts to deal with storm water flow must be consistent with minimizing coastal erosion. Possibly additional percolation basins may need to be created. It seems important to explicitly link this mitigation measure with the erosion control mitigation measures earlier in the DEIR.

15

*Alternatives*

Although State Parks staff and consultants have done a great job of discussing ways to minimize the effects of people and facilities on park natural resources, the preferred plan will have greater impacts than the alternatives. Given that "park and walk to the beach" facilities exist elsewhere in the region, the Minimal Use plan appears to be the one that would most protect the natural resources. Overnight use will lead to people using the dunes at night. These uses will likely negatively affect the fragile vegetation and associated animal species (due to litter and unseen activities on dunes at night). Without overnight camping, the impacts of people are likely to be significantly less. Given that dune habitat is truly rare in California as a result of development, consideration of this alternative needs to be considered. This is a truly rare resource that needs to be given very explicit preservation.

16

Given that camping is a limited resource in this area, the Minimal Facilities projects would be the next best alternative in terms of protecting natural resources. This plan would limit the number of camping spaces to a level that will likely impact natural resources less and have significantly less impact on the aesthetic impact from the SR1 or homes on Fort Ord. In addition, given no other State Park in the area has a Visitors Center (including flagship parks like Point Lobos), there is no precedent within the local parks district to have a Visitor's Center. I suspect a Visitor's Center would actually increase park visitation which may lead to greater impacts. On the other hand a Visitor's Center may increase visitor awareness of the sensitive nature of dune habitat.

*Other Comments*

I found no specific discussion of lifeguards, lifeguard stands, swimming safety or ways to deal with ocean hazards. (There was some interpretation on this issue, but I didn't see any discussion of facilities, emergencies on the beach, etc. I apologize if I

17

missed it in this very long document.). The reason I am bringing it up is that much of the Fort Ord dunes beach is fairly dangerous for swimming. However some visitors will go in the water to swim, surf, etc. Are there any plans at this stage to deal with this issue? For instance, is the plan currently that there will be no life guard stands or life guards and there will only be signage to not go in the water at each beach entry point? Given there will be no obvious vehicle access to the beach, it would be difficult to patrol the beaches or install lifeguard stands. I do not want there to be roads to the beach; however I can imagine that legal issues could arise relating to surf hazards requiring State Parks to monitor the beach with more vigilance. I'm wondering what plans are in place for the entire coast regarding water safety and access.

I look forward to seeing the revised EIR for the Fort Ord Dunes State Park.

Sincerely,



Suzanne E. Worcester, Ph. D.

17  
cont.

11 DR. SUZANNE WORCESTER, CALIFORNIA STATE UNIVERSITY MONTEREY BAY

- 11-1 Dr. Worcester supports the overall General Plan elements and Guideline REG-1. The Department has conducted an extensive planning and public outreach effort as part of the Fort Ord Dunes State Park general planning process. As described on General Plan/EIR page 1-5, the Department completed a Preliminary General Plan for Fort Ord Dunes State Park in 1996 and upon further consideration by the Department, it was determined that the level of development and some facilities envisioned in the 1996 Preliminary General Plan were duplicative of facilities available nearby and potentially inconsistent with Department land use goals and responsibilities. Further, public and agency comment expressed concern regarding the level of use, natural resource sensitivities, etc. The current planning effort attempts to address the issues raised during the earlier planning process, and to balance resolution of those issues with existing natural, cultural, social, and physiographic resources present at Fort Ord Dunes, current regulatory policies, and statewide recreation demand. In addition, the current planning process considered public outreach and input conducted throughout this planning effort, including newsletters distributed to an extensive mailing list, and three public meetings.

The General Plan is not specific in nature and does not designate detailed facilities or types of use. For instance, the General Plan calls for beach use and camping as potential public use types, but does not specify the types of beach use or camping that may be appropriate, nor does the General Plan indicate the specific size, design, or locations of park facilities. Specification of appropriate uses is an operational issue that would be addressed by the District Superintendent during implementation of the General Plan.

- 11-2 Dr. Worcester notes a typographical error related to the San Andreas Fault. In response to Comment 11-2, page 2-14, paragraph 1 has been revised as follows:

**Regional Faults**

The potentially active portions of the Ord Terrace and Seaside faults are located immediately south of Fort Ord Dunes, while the active Monterey Bay Fault Zone lies immediately offshore. The active San Gregorio Fault-Palo Colorado fault is located approximately 14 miles southwest of Fort Ord Dunes, while the active San Andreas Fault Zone is approximately 20 miles ~~southwest~~ east (see Figure 2-3). Maximum credible earthquakes

and historic seismic activity on these faults is summarized on Table 2-2.

- 11-3 Dr. Worcester comments on General Plan/EIR text related to ice plant and invasive non-native plant species dominance at Fort Ord Dunes. While the paragraph noted by Dr. Worcester (page 2-23, paragraph 3) does focus on ice plant and non-native plant species, this section goes on to describe the native dune restoration project, which is predominantly occurring within the Invasive Species Dominant Vegetation Zone. Further, the description of Vegetation Zones and General Plan/EIR Figure 2-5 indicates the presence of the Coastal Dune Zone (northern foredune, central dune scrub, northern coastal scrub, and maritime chaparral communities) intermixed with the Invasive Species Dominant Zone. Therefore, it is acknowledged that pockets of coastal dune habitat and species occur within the Invasive Species Dominant Zone. However, the General Plan does not suggest that areas of the Invasive Species Dominant Zone are not “worth saving.” Instead, the parkwide and management zone specific goals and guidelines seeks to protect and enhance biological resources to the extent feasible, including maintaining a minimum of 700 acres of existing and restored habitat within the 990 acre Fort Ord Dunes property. Much of this restoration would occur within the Invasive Species Dominant Zone, and these areas would be reverted to Coastal Dune Zone communities upon completion of restoration activities.
- 11-4 Dr. Worcester suggests requiring water conserving design and devices. The Department has identified the importance of resource protection and sustainable development as a key factor in this planning effort and as such, sustainability is integrated as a basic concept within the General Plan, as illustrated in the management guidelines and recommendations for facility locations based on natural resource opportunity and constraints analysis. In keeping with that value, the Department intends to implement water conservation strategies and design to the extent feasible, utilizing the principals called for in General Plan guidance called for in Guideline HYD-6.
- 11-5 Dr. Worcester comments that any structural protective measures preventing local coastal erosion would likely result in coastal erosion offsite. General Plan/EIR specifically prohibits the construction on new facilities or permanent structures in areas subject to coastal erosion within 100 years of construction, as noted in policy GEO-1, with the exception of some facilities that may be considered expendable (i.e., roads and trails). The structural protective measures specified in policy GEO-3 are only relevant to existing facilities or permanent structures within the projected

- 100-year coastal erosion zone; these include several bunkers and a pump station located near the southern boundary of the Park. As required in policy GEO-3, structural protective measures would be undertaken only if nonstructural measures are not feasible. Therefore, use of structural protective measures at Fort Ord Dunes would be a rare occurrence. Policy GEO-3 also includes several standards which would address potential impacts associated with use of structural protective measures. In addition, approval of the design and construction of structural protective measures at Fort Ord Dunes would require approval from the California Coastal Commission consistent with the Coastal Act. Compliance with the standards indicated in policy GEO-3 and any requirements set forth by the California Coastal Commission would address potential offsite coastal erosion resulting from construction and use of structural protective measures at Fort Ord Dunes.
- 11-6 Dr. Worcester recommends that tent-only or environmental camping be emphasized at Fort Ord Dunes State Park to reduce potential noise impacts. As noted in response to comment 11-1, the General Plan is not specific in nature and does not designate detailed facilities or types of use, such as campsite types or design. There is a statewide need to provide for all types of camping opportunities, and appropriate types of camping and uses at Fort Ord Dunes would be determined during implementation of the General Plan (and associated area- and site-specific planning) and would address the various types of uses, siting and design considerations, regulatory requirements, and detailed mitigation measures, at the project level.
- 11-7 Dr. Worcester states that editorial changes are required, related to Guideline BIO-13. The source of this comment is not known. The Preliminary Fort Ord Dunes State Park General Plan/Draft EIR circulated by the Department for public review, and posted on the Department's website, does not include the text described by the commenter.
- 11-8 Dr. Worcester indicates support for the extent of the Natural Resource Management Zone, but expresses concern for maintenance of biocorridors through the other park management zones. See response to comment 10-3.
- 11-9 Dr. Worcester recommends additional cleanup of hazardous and other discarded materials and modification to the 1st Street Management Zone. Implementation of General Plan Guidelines HAZ-1 through HAZ-3 would address potential impacts associated with lead contamination prior to and during area- or site-specific development. It is noted that the potential parking area that could be developed at the west end of the zone would

be a short-term parking area only, and would be regulated as such. It is envisioned that this parking area would be utilized as a drop off point for shuttles, etc., or for short term parking for visitors who are unable to travel by non-motorized means to the potential interpretive facilities that could be sited at the western edge of this management zone. Beach access and access to sensitive habitat that may be in the vicinity of this zone would not be permitted and would be regulated through General Plan/EIR guidelines advocating public education and enforcement of appropriate visitor use activities (INT-1, INT-2, INT-4, OPS-7, and OPS-10) would protect natural habitat from active recreation and use of interpretive facilities. Implementation of EIR Mitigation Measure Bio-3, calling for a park Specific adaptive management program, would reduce potential impacts to less than significant at the program level. Beach access may be provided within the 8th Street and Storage Bunker Management Zones and the Department has not determined the need for additional beach access from the 1st Street Management Zone, nor has the Department identified an appropriate beach access route from the 1st Street Management Zone, given the topography and the presence of sensitive habitat west and south of this zone. Development of a Unit Trails Plan (General Plan/EIR Guideline CIR-12) would further address appropriate locations, distances, and use of future trails, and would balance resource protection with opportunities for visitors to enjoy the diversity of park resources.

- 11-10 Dr. Worcester recommends a smaller campground and a focus on environmental camping. The potential range of approximately 50 to 110 campsites within the Storage Bunker Management Zone is a conservative estimate based exclusively on the permissive inclusion of all acreage available within the two cypress tree lines running east-west along the northern edge and center of the zone, which provide potential screening of uses and facilities between the tree lines. The estimate does not include area- and site-specific design considerations, including landscape elements, topography, biological resources survey, etc. See also the responses to Comments 11-1 and 11-6 regarding specification of camping use type designations.
- 11-11 The commenter supports exclusion of overnight lodging from the west of State Route 1 park lands. This comment is noted.
- 11-12 The commenter indicates that water allotment and potential impacts associated with water supplies was not addressed in the General Plan/EIR. See the response to comment 5-10 regarding water use requirements for development of Fort Ord Dunes State Park.

The Environmental Analysis, Utilities and Service Systems section (pages 4-56 and 4-57) considers whether a project would normally result in a significant utilities and service systems impact, including whether the project would have insufficient water supplies available to serve the project from existing entitlements and resources, or if new or expanded entitlements are needed. As indicated in this program level analysis, full implementation of the General Plan would result in minimal increase in demand for utilities services and is not expected to exceed water supply entitlements.

11-13 Dr. Worcester recommends modification to General Plan/EIR mitigation measure Air-1. In response to Comment 11-13, page 4-18, paragraph 3 has been revised as follows:

**Mitigation Measure Air-1.** Potential construction air quality impacts should be reviewed at the project-level for specific facilities or management plans proposed under the General Plan and mitigation measures shall be considered, including but not limited to requiring construction contractors to implement a dust abatement program to reduce the contribution of project construction to local respirable particulate matter concentrations. The program may include the following specific measures:

- Water all active construction areas at least twice daily
- Cover all trucks hauling soil, sand, and other loose materials, or require all trucks to maintain at least two feet of freeboard (i.e., the minimum required space between the top of the load and the top of the trailer)
- Pave, apply water two times daily, or apply non-toxic soil stabilizers to all unpaved access roads, parking areas, and construction staging areas
- Sweep daily with water sweepers any paved access roads, parking areas, and staging areas at construction sites
- Sweep streets daily with water sweepers if visible soil material is carried onto adjacent public streets

- Limit the area of construction sites with minimal earthmoving to 8.1 acres per day and the area of construction sites with grading and/or excavation to 2.2 acres per day<sup>2</sup>
- Suspend excavation and grading activity when winds (instantaneous gusts) exceed 25 miles per hour
- Hydroseed with native species or apply (non-toxic) soil stabilizers to inactive construction areas previously graded areas inactive for ten days or more
- Enclose, cover, water twice daily or apply (non-toxic) soil stabilizers to exposed stockpiles (dirt, sand, etc.)
- Limit traffic speeds on unpaved roads to 15 miles per hour
- Install sandbags or other erosion control measures to prevent silt runoff to public roadways
- Replant vegetation in disturbed areas as quickly as possible
- Where applicable, phase construction projects in such a manner that minimizes the area of surface disturbance (e.g., grading, excavation) and the number of vehicle trips on unpaved surfaces

11-14 Dr. Worcester requests adequate pedestrian and bicycle access under Mitigation Measure Air-2. See the response to Comment 5-6.

11-15 Dr. Worcester requests that Mitigation Measure Hyd-1 be linked to Geology and Soils guidelines addressing soil erosion. The general parkwide management goals and guidelines included in The Plan are intended to address existing issues and provide ongoing guidance for the incremental actions that would be taken over time to realize the long-term vision for the park. These goals and guidelines apply to all geographic areas of the park and all park activities are therefore linked to development of any future stormwater drainage facilities developed within Fort Ord Dunes.

11-16 Dr. Worcester recommends reconsideration of the minimal facility and minimal use alternatives. See the response to Comment 10-11.

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<sup>2</sup> These limits are based on Monterey Bay Unified Air Pollution Control District's threshold of 82 pounds/day of direct PM10 emissions in the *CEQA Air Quality Guidelines*, 2002. The limits are intended for screening purposes and do not represent a definitive significance threshold.

11-17 Dr. Worcester requests discussion of hazardous ocean conditions. Ocean and coastline hazards was identified as a planning issue early in the planning process, and is noted in the General Plan/EIR Site Constraints and Opportunities section (pages 2-88 and 2-94). This issue is addressed through guidelines on emergency vehicle access (CIR-7 and CIR-8), public operations and facilities (OPS-2, OPS-7, and OPS-10), public safety and law enforcement (PUB-3 through PUB-9), and hazards and hazardous materials (HAZ-5). Guidelines PUB-9 and HAZ-5 specifically address emergency services, trained rescue personnel, and regulation of beach use, while other guidelines address parkwide public safety and emergency services.

## **COMMENT LETTERS POSTMARKED AFTER THE CLOSE OF THE CEQA COMMENT PERIOD AND CONSIDERATION OF THOSE COMMENTS**

This section has been prepared in consideration of comments to the Fort Ord Dunes State Park Preliminary General Plan/Draft EIR that were postmarked or faxed after the close of the CEQA 45-day public review period, as described in Chapter 1, Introduction. These comment letters (see Table 2-2) are being considered by the Department, and will become part of the official project record for the proposed action. Each comment is numbered in the margin of the comment letter, and the Department consideration of the comments in a particular letter follow. The comments are referenced by comment letter and comment number. A brief summary of the issue(s) raised in each comment is provided for context, but is not intended to be comprehensive; all comments on the content and adequacy of the Draft EIR are considered in full.

**TABLE 2-2**  
**FORT ORD DUNES PRELIMINARY GENERAL PLAN/DRAFT EIR COMMENT LETTERS**  
**POSTMARKED AFTER THE CLOSE OF THE PUBLIC COMMENT PERIOD**

| Comment Letter Number | Commenter  | Affiliation  | Location               | Date Postmarked or Faxed/ Date Received |  | Comment Topics      | Number of Comments |
|-----------------------|--|--|------------------------|---|--|---------------------|--------------------|
|                       |  |  |                        |   |  |                     |                    |
| A                     | Alan W. Church   | Not Applicable   | Monterey, California   | March 15, 2004/<br>March 16, 2004       |  | Natural Resources   | 30                 |
| B                     | Theresa McGarry, Hazardous Substances Scientist, Office of Military Facilities | California Department of Toxic Substances Control  | Sacramento, California | March 16, 2004/<br>March 16, 2004       |  | Hazardous Materials | 2                  |
| C                     | Joyce Stevens  | Not Applicable   | Carmel, California     | March 15, 2004/<br>March 16, 2004       |  | Natural Resources   | 8                  |
| D                     | Charles Lester, District Director  | California Coastal Commission  | Santa Cruz, California | March 22, 2004/<br>March 24, 2004       |  | Coastal Resources   | 42                 |
| E                     | Nat Roajanasathira, Environmental Senator                                      | California State University Monterey Bay, The Associated Students  | Seaside, California    | March 30, 2004/<br>April 2, 2004        |  | Regional Planning   | 19                 |
| F                     | James M. Willison, Director, Environmental and Natural Resources Management    | U.S. Department of the Army, Defense Language Institute Foreign Language Center and Presidio of Monterey | Monterey, California   | April 2, 2004/<br>April 5, 2004         |  | Regional Planning   | 17                 |

**Alan W. Church**

□ 1251 Josselyn Canyon Road □ Monterey, California 93940 □

March 14, 2004

**RECEIVED**

**MAR 16 2004**

**NORTHERN SERVICE CENTER**

Mr. Jason Spann  
Project Coordinator  
California Department of Parks and Recreation  
Northern Service Center  
One Capitol Mall, Suite 500 Sacramento, CA 95814

Dear Mr. Spann:

The Fort Ord Dunes State Park Preliminary General Plan and Draft Environmental Impact Report (January 2004) is extremely well written and organized. Reviewing it, helped me identify and isolate my major objections which are the basis of many of the fallacies I noted in the General Plan (GP) and the Draft Environmental Impact Report (DEIR).

In general, the GP is well developed and contains many park activities that will bring the public into contact with this unique area. To its detriment however, the plan promotes full access that may overtax the fragile park ecosystem attempting to satisfy all the public comments in Appendix C (Public Review I and II Comments) rather than a stepped plan. In particular, several conflicts exist between the unique existing conditions and sometimes-zealous General Plan recreational opportunities.

I have summarized my observations in items 1-5 (below) where I see the greatest conflicts between the existing conditions in the proposed Fort Ord Dunes State Park (FODSP) and uses proposed in the General Plan. The subsequent attachments identify those deficiencies in specific areas by providing a list of suggested amendments to the text and mitigations in Attachment A for the General Plan and in Attachment B for the Draft Environmental Impact Report (DEIR).

While the GP and DEIR try to address the points that follow, few concrete solutions exist. Often generalizations are offered as solutions at the project level. This tends to marginalize the issues and trivialize the mitigation.

Although the following points are touched upon in Section 2 (Existing Conditions and Issues) they have not been addressed fully in the GP and the DEIR does not reflect them.

1. Pristine Dune Environment.

The Army closed off the dunes, beaches, surf zone and offshore waters behind the firing ranges to protect their personnel and the public from the hazard of live fire. Even though it has an earlier Army history, Camp Ord was in full swing about 1933 (71 years ago). The fore dune area, not having seen human footprints or intervention in all these years, may be returning to near pristine conditions. (Recreation Resources, pg 2-56)

2. Fragile Habitat.

The coastal ecology is fragile and subject to wind erosion (blowouts) and "is not adapted to withstand extensive human disturbance". The limited extent of habitat remaining is why many of the surviving species are rare, threatened or endangered (Ecology, pg 2-40), so that trails into the areas as proposed by the Habitat Management Plan (HMP) seem counter indicated.

The section, Installation Wide Multispecies Management Plan for Former Fort Ord (pg 2-68) indicates the beach access would provide prime public recreation opportunity. But recommended hiking trails are in direct conflict with the previous paragraph especially considering the paragraph goes on to say that the endangered species (sand gilia, Monterey spine flower, Smith's blue butterfly, Western snowy plover, black legless lizard and coast wall flower) require special measures and protection.

2

3. Dune Erosion.

The dune geology is particularly sensitive to erosion and slope failure (Geology and Soils, pg 2-86; Biotic Resources, pg 2-87). Vegetation plays an important role in stabilization. Yet the GP advocates opening the dune area to trails, human and pet traffic. Other Monterey beaches have demonstrated that the public cannot be confined to the beach area. Idle curiosity or adventure draws the public to play on the dune faces which leads in turn to vast blowout areas.

3

4. Infrastructure (Emergency and Public Services, pg 2-89).

a. Fire must not be allowed. The proposed park is located in an area of high fire danger as recently demonstrated by wild fires resulting in extensive air pollution and ash fallout. This region of the state is subject to drought conditions. Firefighters and water to fight fires are extremely scarce.

4

b. Drinking water. The GP proposes 50-110 campsites in the Bunker Zone. Is this equivalent to the water needs of the same number of families while they occupy the sites?

Water is scarce in the Monterey area. It is absent at FODSP. Consideration of the desalination plant is ongoing for the foreseeable future with no solution in sight. FODSP aquifers are contaminated with seawater and a potential toxic plume exists (pg 2-90) so that wells are not feasible.

5

c. Plumbing and Sewage. No sewage facilities exist. The GP should advocate the most primitive sewage facilities: vault toilets, salt water wash/freshwater rinse shower facilities, camp site drinking water provided by campers, capture of natural precipitation for non-drinking water needs. This philosophy will be beneficial to educating the public who may take water availability for granted.

6

d. Electricity. The fantastic biotic resources described have developed in isolation, in natural seasonal daylight and darkness. Artificial lighting must be minimized, directed out of habitat areas, preferably only adjacent to SR 1.

7

Excavation and grading to install these services must be next to and parallel SR1 to avoid further destruction of habitat.

7  
cont.

5. Biotic Resources (pg 2-90)

This paragraph seems in direct conflict with itself and the CA State Park mission. On one hand it admits that FODSP contains one of the last well preserved examples of dune landforms and high quality, natural habitat areas. Yet it advocates full public access and beach activities. In other words, here is an area that evolved protected from human activity and has become unique, particularly since most other similar areas have been destroyed by human activity. Is the GP advocating opening it up to human activity?

8

In closing, most of the activities listed in Section 2, pg 2-91 are in direct conflict with maintaining the wild, natural state that has developed in the area. The creatures and plants that now inhabit the area gravitated to this place because of absence of human activity. This is blatantly overlooked. In particular, wind driven vehicles (kites and gliders) resemble and mimic the flight patterns of raptors (hover, dive and float on the thermals) that prey on shore birds and their nests. Once again these activities are being encouraged to the direct detriment of our rare, threatened and endangered animal species.

We must remember in development of Fort Ord Dunes State Park that many, far more accessible beaches are less than a mile or two away. These parks fully meet the requirements of the public that are being proposed for Fort Ord Dunes State Park. And, they have been at the full disposal of the public. But most importantly, these beaches reflect the toll of human activity and they may be a harbinger of the results of the policy set out for the Fort Ord Dunes State Park.

9

Sincerely,



Alan W. Church

## Attachment A

The following is a list of suggested amendments to the General Plan, noted by section number and page.

### **Land Use and Park Resources (3-7), *Guidelines***

Add:

LU-2a: Analyze carefully if overnight camping is necessary.

LU-2b: Determine the most primitive and least damaging type of camping that will serve public need since Fort Ord Dunes has neither water, sewage or electricity infrastructure.

LU-2c: Work with the goal that it is the park and not the accommodations that is the cultural, biotic, educational, historical, geological, archeological experience desired.

LU-6a: If camping is necessary, ensure that the area chosen is as far removed from environmental impact as possible and close to SR1 to minimize road grading in the habitat.

LU-6b: Ensure that all measures are implemented to prevent exotic plant infestation, that lighting and noise is minimized, that maximum buffering shield areas of light and noise from habitat.

LU-6c: Ensure camping is located in the rear dune areas near SR1 so that grading and infrastructure needed to create these sites will be minimized and least damaging to the habitat. Campsites "with-a-view" will be discouraged in favor of controlled passage into habitat, via self guided trails and boardwalks.

10

### **Meteorology and Air Quality (3-8), *Guidelines***

Add:

AIR-1a: The Park is located in a highly flammable area of CA. Often drought conditions prevail. Water to fight fires is scarce. The camp area may not be patrolled at night for fire safety. For all of these reasons, no individual campfires will be permitted.

11

### **Hydrology (3-9), *Guidelines***

Add:

HYD-4a: To the maximum extent possible the park will be designed to catch storm water run off from buildings, directing the flow to catch basins and cisterns.

HYD-4b: Captured storm water will be used to the maximum extent possible to furnish sewage water, irrigation and access to animals if drought conditions prevail.

HYD-6a: Dry camping will prevail. Vault toilets will be used to the maximum extent possible.

HYD-6b: Self-contained recreation vehicles units are permitted but issuing water to fill their tanks will be restricted.

HYD-6c: No facilities for recreation vehicle sewage dumping will be provided.

12

**Noise Environment (3-13), Guidelines**

Add:

NOI-2a: Maximize camp area setback from habitat to protect it from human noise. Employ maximum use of buffers and fences to prevent inadvertent encroachment into habitat.

13

**Special Status Species (3-14), Guidelines**

Add:

BIO-2a: Over flight of hang gliders and other human wind powered conveyances will be banned from the Natural Resource Zones. These vehicles resemble predatory species that may discourage and prevent rare, threatened and endangered birds from occupying their historic nesting sites in the shoreline dune ecosystem.

14

BIO-3a: Provide tools to enforce guidelines to prevent human and pet violation.

15

**Native Habitat Restoration, (3-16), Guidelines**

Add:

BIO-8a: Care will be observed opening up the shore/fore dune areas. Small parcels will be exposed to human intervention on a trial basis and a careful monitoring program will assess the impact to habitat areas. Some land areas will be retained in the wild state banning access except by permit.

BIO-8b: Access will be granted at one of the three proposed zones followed by a period of monitoring. After the period of time for the opening of the area has expired, this area will be closed and a complete analysis of the effect on habitat and wildlife will be performed. During the analysis period, a new area may be opened and subject to full monitoring methods. Determination of corrections to human access, learned from the analysis will be immediately put into useage.

16

**Native Plant and Animal Species (3-17), Guidelines**

Add:

BIO-20a: Set aside area(s) to remain wild, in the shoreline/fore dune interface. If possible extend this section inland to represent a cross-section, natural progression studies area. A natural progression of the changes in habitat and animal life across the boundaries of shoreline, fore dune, middle to rear dune ecosystems.

BIO-20b: Ban human and pet activities and over flights in these cross-section areas.

17

**Trails (3-38), Guidelines**

Add:

CIR 12a: Prevent trails that cut across the natural wildlife corridors of dune to shore feeding creatures.

CIR-12b: Prevent trails that parallel the shoreline along the crest of the dunes. Instead, develop trails that to go into the dune area at selected spots of least sensitivity. Then encourage returning to north/south traverse trails in rear areas of minimum habitat impact.

CIR-12c: Prevent trail construction or boardwalks that foster vegetation die-off and dune blowout.

18

CIR-12d: Prevent trails or boardwalks into sensitive or pristine areas. Reserve these areas for scientific study.

18  
cont.

**Management Intent (3-55), Guidelines**

Add:

8S-5a: Under no circumstances will land be swapped from the Fort Ord Dunes park area under guidelines 8S-5, 1S-4 or PSA-5 with any person, city or governmental body seeking the exchange to realize commercial development of shoreline with the swapped land.

19

This concludes the additions to Guidelines of the General Plan. The following are two appeals pertaining to the Management Zone discussions found on page 3-45. Please refer to Figure 3-1.

First, please do not allow beach access at both the 8<sup>th</sup> Street Zone and the Bunker Zone at the same time. Reason: People and dogs will roam north and south from each of these points up to ¼ mile along the coast. This will cut across the traditional feeding corridors of shore birds historically operating in this dune/shore habitat. This area has been protected for the last 71 years, probably achieving near pristine ecosystem. Opening beach access points simultaneously will unleash dogs and humans up and down the shoreline and dune faces destroying 50% of the length of the shoreline-foredune habitat. "Natural Resource Zone" in this area will be a joke.

20

One has only to witness the destruction of the similar environment on the Monterey and Seaside State Beaches from Sand City, Tioga Avenue south to the Monterey Beach Hotel and south of the hotel. Historic Western snowy plover nesting in this area has been lost to kite flying, off-leash dogs and humans drawn curiously to areas roped off to protect the bird.

Secondly, if the day-use areas operate at the full capacity, the sheer volume of people projected on page 3-48 together with pets and vehicular impact will overload park natural resources producing little reason for, and value of, the General Plan goals and themes.

The impact of 50-110 campsites at the Bunker Zone suggests 200-440 people will gravitate toward the beach since this is the ultimate experience of the park. Consider in addition full capacity day-use at the 8<sup>th</sup> Street Zone of perhaps another 300-400 people on the beach. People will spread farther up and down the beach to achieve privacy. Unless confinement measures are taken (and enforced) it is realistic to assume that the beach extending from the south boundary north to 8<sup>th</sup> Street will be over whelmed. And if not prevented, hang gliders following the shore dune updrafts, will float from the City of Marina south into the northern Fort Ord Dunes section, frightening shoreline foredune dwelling creatures, and quickly destroying the northern Natural Resource Zone.

21

## Attachment B

The following is a list of comments and suggested amendments to the Draft Environmental Impact Report, noted by section number and page.

### **SIGNIFICANT ENVIRONMENTAL EFFECTS AND MITIGATION, IMPACTS AND MITIGATION MEASURES, Mitigation Measure Aes-1, (4-10,11)**

The mitigation appears to destroy the habitat. Consider:

- a. There is no existing water or sewage infrastructure available. If required, it would have to be installed.
- b. Fort Ord Dunes is historically untrammled along the dunes behind the ranges.
- c. Most native habitat outside the ranges grew during a period absent human activity, except within the firing pits and along the road paralleling SR1.
- d. The area is typically a massive dune ecosystem without native trees.

22

However, all elements in this section emphasize heavy new activity such as excavating, mixing soils, planting screening vegetation, introducing non-native species, etc.

### **Impact Aes-3. Potential Aesthetic Quality Impacts (Public Use), (4-13)**

It is my experience that the public will tend to trespass and especially into remote areas roped off to protect creatures or habitat. CA Parks does not have sufficient manpower to police these areas all of the time. This problem must be addressed early.

23

### **BIOLOGICAL RESOURCES, *THRESHOLD*, (4-22,23)**

I suggest that a complete botanical survey of all species be performed to inventory the Special Status Plant and Animals as listed in Table 2-5 and Table 2-6 on pages 2-31 through 2-38.

24

Then plan access to meet goals requested by the public in Appendix C, Fort Ord General Plan, Agency and Public Comment Report 1, (page 5-8) with particular attention given to page 6, Environmental Issues. Similarly plan access corresponding to Public Comment Report 2, (page 4-7) with particular attention given to page 5, Natural Resource Zone.

25

### **Mitigation Measure Bio-1. (4-24)**

On the second bullet item add the phrase 'and enforcement' as follows:  
Implement a compliance-monitoring and enforcement program ...

26

The other mitigation measures in this section are untenable and unrealistic (e.g. Mitigation Measure Bio-2 and Mitigation Measure Bio-3).

The impact of these two measures will be far-reaching and probably permanent. Fort Ord Dunes has been undisturbed for years. Making it accessible to the public via construction, artificial lighting, mixing soil strata during excavation, biotic harassment, trampling and the impact of pets will sustain irreparable damage.

27

**GEOLOGY AND SOILS, IMPACTS AND MITIGATION MEASURES**

**Mitigation Measure Geo-1. Potential Erosion and Unstable Slope Impacts, (4-34)**

This mitigation measure is totally unsatisfactory. Time after time I have seen sturdy native plantings blown out due to wind in this area. Human traffic and grading will exacerbate this problem on steep dune slopes.

I have assisted in native plant restoration programs along the coast from Marina State Beach to Carmel River State Beach. One has only to look at the fore dune areas in the vicinity of Tioga Avenue, along the recreation trail. This area is constantly being blown out even though the dunes were straw plugged and planted with many native species in the blow out areas. People straying into these roped off areas worsen the problem.

28

**MINIMAL USE ALTERNATIVE, DESCRIPTION OF ALTERNATIVE  
IMPACTS AND REASONS FOR REJECTION, (4-61)**

This reasoning for rejection is flawed.

The public comments summarized in Appendix C do desire the type of park experience proposed in *Description of Alternative*.

And the park lends itself to this type of usage: It does not have water, sewage or electric infrastructure to support traditional camping. The whole region is water deficient. Section 2, Existing Conditions, points out that the aquifers are contaminated by saltwater intrusion. A toxic plume exists, further restricting wells, and it may grow with the lead hazard present. A large number of Monterey State Beach Parks show that human activity generally has degraded the habitat, so that holding this park in minimal use status would retain its quality.

29

The stated reason for rejection is that it "would not fully respond to the Purpose and Vision regarding available public use and diversity of visitor experiences". However, with the sole exception of coastal camping, seven local CA State Beaches present opportunity for beach park experience in a very wide range of both sports activities or simply in quiet contemplation of the natural habitat away from public intrusion.

**EFFECTS FOUND NOT TO BE SIGNIFICANT, (4-66)**

**ASTHETICS**

**SCENIC HIGHWAY IMPACTS**

I take issue with the first paragraph stating that "the surrounding land uses do not include state scenic highways, or otherwise designated scenic routes;"...

SR1 (CA Coast Highway 1) immediately adjacent to Fort Ord Dunes is a scenic highway at least so far as its route south of Monterey and north of Santa Cruz. Some people may even consider its course through the Castroville artichoke fields scenic. And in so far as tourists are concerned, they choose SR1 for the view route, (particularly of Monterey Bay in this area) a scenic highway route, designated or not.

30

So with this in mind, this aspect should not be dismissed.

A ALAN W. CHURCH

A-1 Mr. Church comments that because the Army restricted access to Fort Ord Dunes, the dunes have not seen human use and are returning to near pristine conditions. While it is true that existing land use is limited and undeveloped, past development and extensive use of the land has altered its natural resources and landform. The Department has implemented a large scale native dune restoration project and non-native plant control project; and it is envisioned that the Department would further restore Fort Ord Dunes under the provisions of the Fort Ord Dunes State Park General Plan.

A-2 Mr. Church provides comments related to the *Installation-wide Multispecies Habitat Management Plan for Former Fort Ord, California* and cites potential public uses described in that plan. The Habitat Management Plan was prepared as a separate planning effort, under the management of the U.S. Army Corps of Engineers, and comments regarding the details of the Habitat Management Plan are not addressed in this California Department of Parks and Recreation Response to Comments on the Preliminary Fort Ord Dunes General Plan/Draft EIR. However, it is noted that while Department management of Fort Ord Dunes State Park would be in compliance with the management requirements set forth in the Habitat Management Plan, trail planning and public use areas designated within the Fort Ord Dunes General Management Plan may differ from that described in the Habitat Management Plan. Development of a Unit Trails Plan (General Plan/EIR Guideline CIR-12) would further address appropriate trail locations, distances, and use of future trails, and would balance resource protection with opportunities for visitors to enjoy the diversity of park resources.

A-3 Mr. Church comments on public use of Fort Ord Dunes beaches and the potential for unauthorized use of dune areas. Access to sensitive habitat that may be in the vicinity of beaches would not be permitted (see the Department consideration of Comment A-2 regarding development of a Unit Trails Plan) and would be regulated through General Plan/EIR guidelines advocating public education and enforcement of appropriate visitor use activities (INT-1, INT-2, INT-4, OPS-7, and OPS-10). Implementation of EIR Mitigation Measure Bio-3, calling for a park specific adaptive management program would reduce potential impacts to less than significant at the program level. Public use programs operated at Asilomar State Beach, Marina State Beach, and Salinas River State Beach have demonstrated successful resource protection projects that include boardwalks or other management and use techniques that allow for appropriate levels of public use while protecting sensitive resources. It

- is anticipated that similar programs could be implemented at Fort Ord Dunes, along with implementation of the management goals, guidelines, and mitigation measures described in the General Plan/EIR to provide opportunities for public appreciation of the unique resource values of Fort Ord Dunes, while enhancing and protecting those values.
- A-4 Mr. Church comments that fire should not be permitted at Fort Ord Dunes. This comment is noted. Specification of appropriate uses is an operational issue that would be addressed by the District Superintendent during implementation of the General Plan. The Department would review this recommendation further at that time.
- A-5 Mr. Church comments on potential park water demands and sources and asks whether campground water use demand is equivalent to residential water use demands. See the response to Comment 5-10. Because campgrounds typically lack utilities such as full kitchens, laundry, etc. and because campground users are not typically at campgrounds the same number of hours per day as occurs in residential uses, the gallons per day water demand projection is lower for campgrounds. The Department has established standard Guidelines for Determining Water Supply and Wastewater Disposal Requirements (2001) which estimate that campground water use demands would be 27.3 gallons per day per visitor, while the estimate for residential uses would be 100 gallons per day per person.
- A-6 Mr. Church encourages use of 'primitive' park utilities. This comment is generally consistent with General Plan/EIR goals and guidelines regarding sustainable design practices (see pages 3-33 through 3-34). The Department has identified the importance of resource protection and sustainable development as a key factor in this planning effort and as such, sustainability is integrated as a basic concept within the General Plan, as illustrated in the management guidelines and recommendations for facility locations based on natural resource opportunity and constraints analysis. The Department would further review the recommendations provided during planning and design phases for area- and site-specific development that includes wastewater facilities.
- A-7 Mr. Church recommends minimal park lighting, the construction of which should not disturb sensitive habitat. This comment is consistent with aesthetic resources guidelines AES-6 through AES-8, as well as the program level discussion of impacts associated with construction and development of recreation and associated facilities (see General Plan/EIR, Chapter 4, Environmental Analysis).

- A-8 Mr. Church comments that full public access to Fort Ord Dunes is in direct conflict with maintaining the natural resources of this area. The Department Mission includes a dual mission to protect the state's most values natural and cultural resources, and create opportunities for high-quality outdoor recreation. Fort Ord Dunes State Park provides a unique opportunity to fulfill both aspects of the Department mission through retention of the relatively undeveloped character and spectacular natural and scenic beauty, while allowing for development of recreation and interpretation/education facilities in portions of Fort Ord Dunes. The list of potential recreation opportunities cited by Mr. Church (General Plan/EIR page 2-91) describes potential park uses recommended during early planning stages by the Department, resource and other agencies, and the public. The planning process carefully considered the sensitivity of park resources in concert with statewide and local public use needs and desires to determine the range of uses and facilities most appropriate at Fort Ord Dunes, as well as to determine the most appropriate placement of public use or other facilities. The planning process included careful consideration of existing natural, cultural, and social resources, as well as existing facilities and areas of disturbance in order to determine the overall management intent for the park, as described in General Plan/EIR Chapter 3, The Plan, and to determine management zones (see General Plan/EIR pages 3-46 through 3-62). It is noted that the majority of the park acreage (approximately 785 of the 990 acre property) would be categorized within a Natural Resource Management Zone, with minimal facility development and public use and that areas not developed for public use and facilities in other zones would be restored.
- A-9 Mr. Church comments that the region includes beaches that allow public access. While the Monterey Bay region includes public beaches, campground development and other facilities, such as interpretive displays and trails, are not readily available in the central Monterey Bay area. Local and statewide public recreation demand demonstrates the need and desire for additional recreation opportunities, particularly those providing coastal access and camping. Further, provision of recreational opportunities, combined with public use education, can provide visitor experiences that develop an appreciation of natural and cultural resources and can improve quality of life, and mental and physical health. This appreciation of natural and cultural resources can encourage resource conservation and stewardship on a state, national, and global scale through increased public support and funding for land conservation, resource management, and environmental protection policy.
- A-10 Mr. Church requests consideration of General Plan/EIR land use and park resources guidelines amendments. The requested planning processes

- are consistent with the extensive planning conducted in developing the General Plan/EIR and the resource consideration and evaluation conducted throughout the planning process. See the Department consideration of Comments A-6, A-7, and A-8. The planning process included careful consideration of existing natural, cultural, and social resources, as well as existing facilities and areas of disturbance, in order to determine appropriate park uses and facilities, management zones, and potential circulation, particularly in regard to potential campground locations. The Department selected an area within the Storage Bunker Management Zone for a potential campground specifically because this area represents the most accessible, yet secluded area of the unit (see General Plan/EIR pages 3-57 through 3-59). See also the responses to Comments 11-1 and 11-6 regarding specification of camping use type designations.
- A-11 Mr. Church requests consideration of General Plan/EIR air quality guideline amendments. See the Department consideration of Comment A-4.
- A-12 Mr. Church requests consideration of General Plan/EIR hydrology guidelines amendments. This comment is generally consistent with General Plan/EIR goals and guidelines regarding sustainable design practices (see pages 3-33 through 3-34), as well as guidelines regarding stormwater systems, water quality, and utilities. The Department would further review the recommendations provided during planning and design phases for area- and site-specific development that would generate stormwater or water use demands.
- A-13 Mr. Church requests consideration of General Plan/EIR noise guideline amendment. This comment is generally consistent with the General Plan/EIR goals and guidelines regarding the noise environment and biological resources (see Guidelines NOI-2, BIO-2, BIO-3, and BIO-7 in particular). In addition, management zone planning (see General Plan/EIR pages 3-46 through 3-62) included an approximately 100 foot buffer between a potentially sensitive resource and the delineation of a development oriented management zone
- A-14 Mr. Church recommends banning park uses resulting in over flight of the Natural Resource Management Zone. The General Plan/EIR does not designate take-off or landing areas for such uses because of the availability of such facilities within nearby recreation areas. The Department would continue to consider visitor preferences and comments, along with local and statewide public recreation demand, state policies, and resource conditions as consistent with the range of uses and facilities

considered appropriate in the General Plan/EIR when developing area- and site-specific plans for Fort Ord Dunes. In addition, the Department would monitor occurrences of over flight of Fort Ord Dunes from nearby areas as part of the adaptive management process described on General Plan/EIR pages 3-62 through 3-68 and the adaptive management program called for in Mitigation Measure Bio-3. If it is determined that over flight of Fort Ord Dunes is resulting in special-status species effects, the Department would work with applicable regulatory agencies to take appropriate action.

- A-15 Mr. Church recommends inclusion of enforcement guidelines within General Plan/EIR special-status species guidelines. Park enforcement guidelines are specifically addressed under Public Safety and Law Enforcement (General Plan/EIR pages 3-41 and 3-42). Control of domestic animals is addressed in General Plan/EIR guideline BIO-18. Guideline Bio-18 has been revised, under the request of the U.S. Fish and Wildlife Service, to further describe California Code of Regulations, Title 14, Division 3, Section 4312 requirements, such as restricting dogs to the limits of campgrounds, picnic areas, parking areas, roads, etc.; restricting dogs from beaches; and requiring leashes (see the response to Comment 10-6). See also the Department consideration of Comment A-3.
- A-16 Mr. Church recommends phased use of park areas. This comment is generally consistent with the adaptive management process described on General Plan/EIR pages 3-62 through 3-68.
- A-17 Mr. Church recommends inclusion of undeveloped areas in the shoreline/foredune interface. See the Department consideration of Comments A-8, A-14, and A-15.
- A-18 Mr. Church requests consideration of trails guidelines amendments. This comment is generally consistent with natural resource protection guidelines developed for this General Plan/EIR. In addition, Development of a Unit Trails Plan (General Plan/EIR Guideline CIR-12) would further address appropriate trail locations, distances, and use of future trails, and would balance resource protection with opportunities for visitors to enjoy the diversity of park resources.
- A-19 Mr. Church recommends terms regarding potential land transfers. Detail regarding transfer and/or acquisition of additional nearby property, or other cooperative land management efforts is found on General Plan/EIR pages 3-44 through 3-45 (guidelines REG-1 through REG-8). The terms of any land transfer would require consistency with the General Plan/EIR, State of California regulations (California Department of Parks and Recreation,

California Coastal Commission, and other state regulatory bodies), and other applicable regulatory requirements.

- A-20 Mr. Church recommends inclusion of a single beach access point. The Department may consider phased addition of beach access points, as consistent with the adaptive management process described on General Plan/EIR pages 3-62 through 3-68. See also the Department consideration of Comments A-3 and A-15 regarding regulation of unauthorized use and control of domestic animals.
- A-21 Mr. Church comments on the visitor capacity that could occur under the General Plan/EIR. The potential range of approximately 50 to 110 campsites within the Storage Bunker Management Zone is a conservative estimate based exclusively on the permissive inclusion of all acreage available within the two cypress tree lines running east-west along the northern edge and center of the zone, which provide potential screening of uses and facilities between the tree lines. The estimate does not include area- and site-specific design considerations, including landscape elements, topography, biological resources survey, etc. The Department would undergo area- and site-specific planning for implementation of General Plan elements, including campground development, and would determine if further environmental review at a more detailed level were necessary. See also the Department consideration of comments above.
- A-22 Mr. Church comments that the aesthetic resources mitigation measure addressing design practices would result in resources impacts. The comment indicates that development of park uses and facilities would result in damage of park resources. The General Plan/EIR was specifically prepared to ensure that all park uses and facilities are developed consistent with the natural, cultural, and social resources of Fort Ord Dunes. The goals and guidelines included in Chapter 3, The Plan, and the mitigation measures listed in Chapter 4, Environmental Analysis were developed in response to evaluation of existing conditions and are intended to address existing issues and provide ongoing guidance for the incremental actions that would be taken over time to realize the long-term vision for the park. The park's resources would be managed by balancing the needs for recreation with the protection and restoration of its resources. Implementation of the general plan goals and guidelines, in combination with recommended mitigation measures, would reduce program level impacts to less than significant for all activities associated with construction, design, and operation of park uses and facilities. See also the Department consideration of Comment A-1.

- A-23 Mr. Church comments on the discussion of aesthetic quality impacts related to public use. See the Department consideration of Comment A-3.
- A-24 Mr. Church recommends botanical survey of special-status species at Fort Ord Dunes. General Plan/EIR guidelines LU-1, LU-3, LU-4, BIO-1, and BIO-9 specifically address park resources survey.
- A-25 Mr. Church recommends park planning that is consistent with public use goals presented through agency and public outreach and environmental issues identified for Fort Ord Dunes through that process. Chapter 3, The Plan, including the development of management zones with appropriate uses and facilities, was developed partially in response to the formal and informal comments collected through extensive agency and public outreach efforts. The planning team utilized public and agency comments to develop potential uses and facilities, and to identify natural, cultural, and social resource sensitivities perceived by commenters. Management zones were established based on natural, cultural, social, and physiographic resources at Fort Ord Dunes, while considering future goals for the area based on opportunities, constraints, and issues identified through review of the existing conditions of the park unit—in addition to state policies, statewide recreation demand, and agency and public comment.
- A-26 Mr. Church recommends addition of an enforcement element to mitigation measure Bio-1. The cited mitigation measure addresses biological resources protection associated with potential future development of new facilities and the required compliance-monitoring program related to CEQA and other pertinent regulations, and incorporates enforcement, as appropriate. Park enforcement is also addressed in the Department consideration of Comment A-3.
- A-27 Mr. Church comments that Mitigation Measures Bio-2 and Bio-3 are untenable and unrealistic because development of park uses and facilities would result in damage of park resources. See the Department consideration of Comment A-22.
- A-28 Mr. Church comments that Mitigation Measure Geo-1 is unsatisfactory. Mitigation Measure Geo-1 is recognized as an appropriate measure by geology and engineering professionals. This measure, in addition to General Plan guidelines that address coastal erosion, restoration of landforms, geotechnical investigations and design requirements, etc. (see General Plan/EIR pages 3-10 through 3-12), would reduce potential erosion and unstable slope impacts to less than significant at the program level. Site-specific design would be required to tailor erosion control

measures appropriate for the unique character of each development area considered for Fort Ord Dunes.

- A-29 Mr. Church requests reconsideration of the minimal facility and minimal use alternatives. See the response to Comment 10-11.
- A-30 Mr. Church disagrees with statements in the General Plan/EIR regarding state scenic highways and designated scenic routes. The Department recognizes the high scenic value of Fort Ord Dunes as seen from State Route 1 and other areas outside the property, as described in General Plan/EIR pages 2-49 through 2-56. While no officially designated scenic areas or routes occur within or in close proximity of Fort Ord Dunes, as recognized by any regulatory body (i.e., California Department of Transportation or Monterey County), the aesthetic quality of Fort Ord Dunes is of utmost concern for the Department and was considered foremost among park resources requiring protection during development of The Plan and park management zones. For example, as described on General Plan/EIR page 4-46 management zones were developed to exclude areas of biological, aesthetic, and geographic sensitivity from development oriented management zones where frequent visitor use is anticipated. Areas of Fort Ord Dunes where aesthetic resources sensitivity is greatest is displayed on General Plan/EIR Figure 2-8 and were areas that were avoided when delineating development oriented management zones.



Terry Tamminen  
Agency Secretary  
Cal/EPA



## Department of Toxic Substances Control

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Arnold Schwarzenegger  
Governor

March 16, 2004

**RECEIVED**

MAR 16 2004

**NORTHERN SERVICE CENTER**

Mr. Jason Spann  
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**REVIEW AND COMMENTS FOR FORT ORD DUNES STATE PARK, PRELIMINARY  
GENERAL PLAN/DRAFT ENVIRONMENTAL IMPACT REPORT, JANUARY 2004**

Dear Mr. Spann:

Thank you for allowing the Department of Toxic Substances Control (DTSC), the opportunity to review the above subject document. The public comment period closed on March 14, 2004, a Sunday. Although our comments are postmarked March 15, 2004, based on our telephone conversation on March 12, 2004, you concurred that our comments will be included in the official record. DTSC understands the Department of Parks and Recreation is the lead agency responsible for this document, pursuant to the California Environmental Quality Act (CEQA).

DTSC is the State Lead agency for environmental cleanup of Fort Ord and has jurisdiction over all hazardous substances and hazardous waste issues. The basis for DTSC's regulatory authority is found in California Health and Safety Code, Division 20, Chapters 6.5 (Hazardous Waste Control Law), Chapter 6.8 (Hazardous Substances Account Act), and California Code of Regulations, Title 22, Division 4.5.

The Central Coast Regional Water Quality Control Board (CCRWQCB) has authority over the remediation of petroleum sites and the protection of the waters of the State of California. The CCRWQCB regulatory authority is found in the Porter-Cologne Water Quality Control Act, California Water Code and California Code of Regulations, Title 22 and 23.

Please consider the following comments:

**General Comments:**

1. A post-remediation risk assessment for ecological and human health is currently being conducted which will be considered in the Army's Proposed Plan and Record of Decision for ecological risk for the site.
2. DTSC is currently working with State Parks to finalize an agreement that will address property use restrictions, inspections, ordnance recognition training and reporting. This agreement will also provide for Army ordnance recognition training for workers involved in soil disturbance during park construction. As a provision to this agreement DTSC will enter into a Land Use Covenant (LUC) with State parks pursuant to Civil Code 1471 to implement any necessary land use restrictions due to the presence of residual lead on the parcel.

1

**Specific Comments:**

Background and Current Site Condition section; Soil Conditions; page 2-62

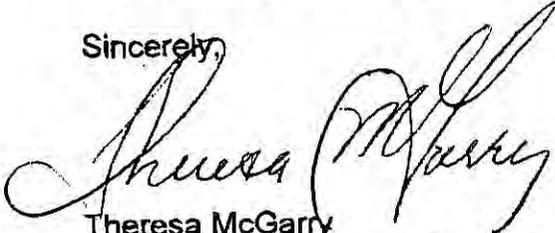
As described in the Draft EIR, much of the parcel was used for small arms firing ranges. The Army subsequently removed a large amount of lead bullets and lead contaminated soil. A Baseline Ecological Risk Assessment (BERA), conducted as part of the Remedial Investigational Feasibility Study (RI/FS) evaluated the potential effects of site-related activities on ecological receptors. Results of the evaluation were inconclusive, specifically the effects of lead on ecological receptors. Since some of the results of the BERA were inconclusive, a cleanup strategy for ecological receptors was not developed. A human health based remediation action objective (RAO) of 1860 mg/kg for lead was recommended on the basis of the Baseline Human Health Risk Assessment. This cleanup strategy was developed for the proposed reuse of ranges as a limited access state park. If the reuse changes, site specific clean-up goals which are consistent with the characteristics and intended reuse of the site will need to be evaluated (i.e., DTSC lead spread model to evaluate residential scenario).

2

Mr. Jason Spann  
March 16, 2004  
Page 3

If you have any questions, please contact me at (916) 255-3664 or Mr. Roman Racca,  
Project Manager, at (916) 255-6407.

Sincerely,



Theresa McGarry  
Hazardous Substances Scientist  
Office of Military Facilities

cc: Ms. Claire Trombadore  
U.S. Environmental Protection Agency  
75 Hawthorne Street  
San Francisco, California 94105

Ms. Gail Youngblood  
Fort Ord BRAC Environmental Coordinator  
Department of the Army  
Environmental and Natural Resources  
Post Office Box 5004  
Presidio of Monterey, California 93955-5008

Mr. Guenther Moskat  
Planning and Environmental Analysis Section  
California CEQA Tracking Center  
1001 I Street, 22<sup>nd</sup> Floor  
Sacramento, California 94812-0806

Office of Planning and Research  
State Clearinghouse  
1400 Tenth Street  
Post Office Box 3044  
Sacramento, California 95812-3044

Mr. Jason Spann  
March 16, 2004  
Page 4

cc: Mr. Grant Himebaugh  
Regional Water Quality Control Board  
Central Coast Region  
895 Aerovista Place, Suite 101  
San Luis Obispo, California 93401-7906

Mr. Roman Racca  
Project Manager  
Office of Military Facilities  
Department of Toxic Substances Control  
8800 Cal Center Drive  
Sacramento, California 95826-3200

**B THERESA MCGARRY, CALIFORNIA DEPARTMENT OF TOXIC SUBSTANCES CONTROL**

- B-1 The Department of Toxic Substances Control indicates that an ecological and human health risk assessment is being conducted for Fort Ord Dunes and that they are working with the Department on property use restrictions, inspections, and other procedures. This comment is consistent with information included in the General Plan/EIR (see pages 2-61 through 2-65).
- B-2 The Department of Toxic Substances Control indicates that clean-up goals may need to be evaluated, should Fort Ord Dunes be developed with more than 'limited' access. The Department would further review the Department of Toxic Substances Control requirements and recommendations during area- and site-specific planning. As noted, the Department of Toxic Substances Control is currently working with the Department on property use restrictions, inspections, and ordnance recognition training and reporting.

**JOYCE STEVENS**  
**P.O. Box 2116**  
**Carmel-by-the-Sea, California 93921**

14 March 2004

Mr. Jason Spann  
Project Coordinator  
California Department of Parks and Recreation  
Northern Service Center  
One Capitol Mall, Suite 500  
Sacramento, Ca., 95814

**RECEIVED**

**MAR 16 2004**

**NORTHERN SERVICE CENTER**

Dear Mr. Spann:

Since 1985 I have worked with several environmental groups to preserve the dunes of Monterey Bay. The following are my comments on the Fort Ord Dunes State Park Preliminary General Plan, Draft Environmental Impact Report:

1. Generally, the plan is proceeding in a good direction.
2. Recommend that the plan include a description of the Monterey Bay State Seashore, (which was created by Sam Farr's legislation in the mid 1990s) and describe how the Fort Ord Dunes State Park becomes a part of the State Seashore, sharing the overall goal of recreation and restoration of the ecosystem of the Central California Coast. | 1
3. I feel that the following recreational uses are not compatible with this area: horseback riding; motor vehicles of any kind; swimming (dangerous off-shore currents); unrestricted beach use (eroding step cliffs are dangerous); hiking in dunes—except on boardwalks located out of sensitive areas; overnight camping (day use only). | 2
4. I agree with public access only at 8<sup>th</sup> Street and definitely no thru-road from Marina to Seaside – as once suggested by Marina. | 3
5. The Beach Garden Project has done some dune restoration work. I recommend that this volunteer program and other similar ones be continued and expanded. | 4
6. Special protection should be given to the existing Smith's Blue butterfly preserve located in the southern area (sign designates the area). | 5
7. Provide storm drain system that prevents further beach erosion. | 6
8. Recommend that all facilities be designed to be "green" architecture (i.e., passive solar, bale construction, Clivas Malthum toilets, photovoltaic electrical system, water reclamation, etc.) | 7

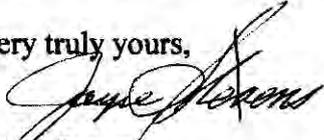
9. Use electric park vehicles.

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cont.

Please put my name on the mailing list so that I can receive all future notices. I see that these comments are to be mailed by 14 March. However, since 14 March is a Sunday, this letter will have a 15 March postmark.

8

Very truly yours,

A handwritten signature in cursive script, appearing to read "Joyce Stevens".

Joyce Stevens

C JOYCE STEVENS

- C-1 Ms. Stevens recommends addition of a description of the Monterey Bay State Seashore to the General Plan/EIR. The Monterey Bay State Seashore is described on General Plan/EIR pages 3-4 and 3-5. In addition, Guideline REG-6 calls for public policy development that shapes and supports present and future parks and notes that as the largest unit of the Monterey Bay State Seashore, Fort Ord Dunes State Park offers an opportunity to present a high profile model for ecological sensitivity balanced with quality recreational use.
- C-2 Ms. Stevens states a preference to restrict certain recreation uses from Fort Ord Dunes. The Department would continue to consider visitor preferences and comments, along with local and statewide public recreation demand, state policies, and resource conditions as consistent with the range of uses and facilities considered appropriate in the General Plan/EIR, when developing area- and site-specific plans for Fort Ord Dunes.
- C-3 Ms. Stevens states a preference for public access at 8th Street and no connections to the cities of Marina and Seaside west of State Route 1. This comment is consistent with the circulation goals and guidelines described in the General Plan/EIR.
- C-4 Ms. Stevens recommends inclusion of the Beach Garden Project as a park volunteer program. This comment is consistent with the interpretive goal calling for volunteers and cooperating associations, and the associated Guidelines INT-11 and INT-12.
- C-5 Ms. Stevens recommends special protection for Smith's blue butterfly habitat in the southern Fort Ord Dunes Area. This comment is consistent with parkwide goals and guidelines regarding biological resources, and special-status species in particular (Guidelines BIO-1, BIO-2, and BIO-4); as well as the designation of the Natural Resource Management Zone, which includes the areas noted in this comment.
- C-6 Ms. Stevens requests inclusion of a storm drain system that prevents further beach erosion. This comment is consistent with hydrology and geology and soils goals and guidelines addressing park erosion control and stormwater drainage (see for example Guidelines HYD-6, HYD-7, GEO-1, and GEO-2).
- C-7 Ms. Stevens recommends use of "green" architecture and electric park vehicles. This comment is consistent with General Plan/EIR goals and

guidelines regarding sustainable design practices (see pages 3-33 through 3-34). The Department would further detail sustainable design features during area- and site-specific planning for implementation of General Plan elements.

- C-8 Ms. Stevens requested addition of her name to the project mailing list. Ms. Stevens has been included on the project mailing list throughout this planning process and will continue to receive materials distributed to the Fort Ord Dunes State Park General Plan mailing list.

**CALIFORNIA COASTAL COMMISSION**

CENTRAL COAST DISTRICT OFFICE  
 725 FRONT STREET, SUITE 300  
 SANTA CRUZ, CA 95060  
 (831) 427-4863

**RECEIVED**

MAR 24 2004

**NORTHERN SERVICE CENTER**

March 20, 2004

Mr. Jason Spann  
 Project Coordinator  
 California Department of Parks and Recreation  
 Northern Service Center  
 One Capitol Mall, Suite 500  
 Sacramento, CA 95814

Subject: Fort Ord Dunes State Park Preliminary General Plan and Draft Environmental Impact Report, January 2004, Coastal Commission Staff Comments

Dear Mr. Spann:

Thank you for the opportunity to review and comment on the California Department of Parks and Recreation (Department) Fort Ord Dunes State Park Preliminary General Plan and Draft Environmental Impact Report (Plan), January 2004. Due to staffing constraints we were unable to meet the March 14 submittal date and appreciate the Department's willingness to consider our comments.

The 2004 Preliminary General Plan and EIR is a program level plan. As a first tier of planning for the park, the Plan is a framework that sets overall goals for desired resource conditions, provisions for public use and park management but does not define project level development specifics. The Plan also states that since the specifics as to development are not provided in the document, additional CEQA review would be needed for individual projects

The Fort Ord Dunes State Park lands are geographically located within the Local Coastal Program jurisdiction of Monterey County. However, until such time as the County has a certified local coastal program for the area, pursuant to the state's coastal management program under the Coastal Act of 1976, development activities in the Fort Ord Dunes including construction of buildings, grading, paving, and activities that change the intensity of use of the land or public access to the coast will require review for coastal development permit requirements from the Coastal Commission. We recommend that planning documents such as the Unit Trail Plan and the Circulation and Access Management Plan be developed in consultation with Commission staff. Another option is for the Department to submit a Public Works Plan (PWP) under Section 30605 of the Coastal Act. A PWP if certified by the Coastal Commission would allow DPR to undertake specific development projects in the PWP without further review by the Commission.

We would like to acknowledge the significant and high quality work the Department has accomplished in the development of the Plan. The Department has responded to many of the issues raised by the Coastal Commission and other commentators to the 1996 General Plan through revisions to the Plan or by actions taken by the Department or in conjunction with U.S. Army during these interim years.

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We note major modifications from the 1996 General Plan that more clearly reflect the State Parks Public Resources Code 5019.53 requirement that allows only attractions that directly enhance enjoyment of the natural, scenic, cultural, or ecological values of the resource. Among these are the deletion of all lodge and cabin units (55-110 units); deletion of the two restaurants; reduction of the number of camping units from a range of 150-300 to a range of 50-110; reduction of day use vehicle parking from 240 to a range of 145-190; and a revised circulation system that deletes public vehicular access to both the far north and south ends of the park.

In addition, a GIS database of park resources has been created to analyze and map the patterns of resources within the park. The Plan also provides for coordination between public agencies and municipalities in an effort to prevent the duplication of facilities, reduce development on the dunes and provide continuity of recreational trails. When planning future development the Plan provides for conformance with all plans – Habitat Conservation Plan, Monterey County General Plan, California Coastal Act, National Marine Sanctuary and would consider, but is not required to comply with, the Fort Ord Reuse Authority Development Plans.

Many physical changes have also altered the planning landscape, including the removal of Stillwell Hall in 2003, the removal of fifty-seven buildings along with utility poles in 1997, and in the fall of 2003 the removal of four and reinforcement of two failing outfalls. Three stormwater percolation basins and diversion facilities were installed. Long term planning proposes that with the future redevelopment of former Fort Ord military reservation, the drainage master plan will locate all percolation basins east of State Highway 1 (SR-1).

The U.S. Army has undertaken extensive hazardous material cleanup which was required prior to transfer of the land to the Department, and the Department has undertaken a large scale (150 acre) dune restoration project and non native plant control project at these lead remediation and recontoured sites.

#### Fort Ord Dunes State Park Management Zones

The Plan identifies five conceptual Fort Ord Dunes State Park Management Zones. According to the Plan the Zones were identified to maximize inclusion of existing disturbed areas, exclude areas of biological, aesthetic and geographic sensitivity, with no spent ammunition present, and to maximize special status species in zones of minimal development and low visitor use. The Zones and possible facility improvements are:

- The Natural Resources Zone of 785 acres which could include habitat preservation/restoration, walking/trail use, nature study and observation, sightseeing, beach use, emergency/operational access and interpretation of park resources.
- The 8<sup>th</sup> Street Zone of approximately 30 acres includes trails and beach access, entrance station, picnic area, visitor center, restrooms/utilities, parking for 90-100 (existing and new) and existing emergency/operational vehicle routes.
- The 1<sup>st</sup> Street Management Zone of approximately 45 acres could provide an entrance station, visitor center, vista point, restroom/utilities, 15-20 parking spaces, interpretation

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of military era structure and former firing range, new paved and unpaved trails, new and existing emergency/operational vehicle routes.

- The Storage Bunker Zone is approximately 80 acres. Uses could include group and family camping (potential range of 50-110 campsites) and day use parking areas with 40-80 parking spaces (total). Administrative uses, adaptive reuse of bunkers for storage. Restrooms/utilities infrastructure. Trails, interpretive facilities.
- The Park Support/Administrative Management Zone is approximately 25 acres. 14 acres within the Balloon Spur of the railroad are proposed for park support facilities, administration and employee housing. Park visitors would not enter this area. The eleven acres inland of SR1 (not within the coastal zone) could provide a park or regional multi-agency visitor center, youth hostel, and associated parking, approximately 40-80 spaces.

In addition to the 5 zones there are 25 acres of existing facilities such as percolation basins, an abandoned wastewater treatment plant and wastewater pump stations leased and/or managed by other agencies.

#### Development in Coastal Dunes

The Plan reports that coastal dune communities and dune landforms constitute an increasingly scarce resource along the California coast that is highly susceptible to change due to natural forces and to the traffic of human activity. It also reports that local and statewide public recreation demand demonstrates the need and desire for additional recreational opportunities, particularly those providing coastal access and camping. The recreational facilities would support public needs and would provide revenue to the system.

Hundreds of acres of the Fort Ord Dunes State Park coastal dunes have been degraded, many were vegetated with ice plant for dune stabilization by the U.S Army, and others were covered with spent shell casings from the Army's firing ranges. We understand that the Management Zones (development envelopes) designated in the Preliminary General Plan 2004 for facility development are outside the areas designated by the USFWS as natural resource areas where protection and restoration of habitat and standards for successful implementation of a sustainable ecosystem are required. These are the areas set aside for protection to fulfill the legal requirements that allow USFWS and CDFG to issue Take Authorizations for Covered species pursuant to the ESA and NCCP Act for development in other areas. Under the HCP there is to be no net loss of HMP species populations. Though the HCP may result in diminution of habitat and taking, it will assure sustainability. Hence, according to the HCP the disposal and reuse of Fort Ord coastal dune parcels results in a positive effect on coastal populations of special status species. Most parcels designated for development will contain no restrictions or habitat management requirements under the HCP (Draft HCP Implementing Agreement 9/2000).

However, as discussed above, the state's coastal management program under the Coastal Act of 1976 provides for independent review by the Coastal Commission of development activities in the Coastal Zone including in the Fort Ord Dunes. Though the requirements of the federal HCP

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will be implemented, additional and more rigorous standards may be required by the Coastal Commission for a determination of consistency with the Coastal Act. The General Plan confirms that dune landforms represent one of California's most degraded communities with few naturally functioning systems left in the state. Because coastal dunes are such an extremely limited environmental resource of statewide significance and provide unique, sensitive habitat values, it has been the Coastal Commission's determination that *all* dunes are environmentally sensitive habitats.

Section 30240 Environmentally sensitive habitat areas; adjacent developments

*(a) Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas.*

*(b) Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas, and shall be compatible with the continuance of those habitat and recreation areas.*

Dunes vegetated with introduced plant species, e.g., ice plant (*carpobrotus edulis*) or deformed by off-road vehicle use or other activities are, nevertheless, environmentally sensitive habitat subject to protection under Coastal Act Public Resource Code Section 30240. Only uses that are resource dependent should be proposed for dune areas. Uses that have been considered resource dependent in dune habitats include low impact interpretive facilities, boardwalks, sand ladders, and environmental campsites. A possible exception for non resource dependent uses in the dunes may be for dune areas that contain impervious surfacing and structures.

To determine the areas of the Fort Ord Dunes State Park that may be suitable for non resource dependent uses, we recommend that the Department map and quantify the areas of impervious surfacing and buildings within the five Management Zones identified in the Preliminary General Plan.

Throughout the Plan many of the discussions and guidelines recognize the desirability of locating non-resource dependent uses outside the coastal dunes. We support the Department's consideration of adaptive reuse of existing facilities, such as bunkers and buildings, and exploring potential for cooperative agreements with other land owners and land management agencies to provide for operations and other facilities east of SR1. For example, Guideline 1S-4 proposes to explore placement of the visitor entrance station outside the park in vicinity of 1st street overpass. Guideline 8S-5 proposes to explore placement of visitor entrance station outside park in vicinity of 8<sup>th</sup> street overpass. Regional Planning guideline REG-1 provides for multi agency planning to evaluate locating park administration, operations, employee housing and maintenance facilities, overnight lodging, an entrance station or a visitor center on non-park lands east of SR 1.

The Minimal Facility Alternative discussed in Chapter 4, Environmental Analysis, of the Plan focuses on non vehicular access, provides a smaller acreage of overnight camping at the

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Storage Bunker Zone, an 8<sup>th</sup> Street beach access route with day use parking and a 1<sup>st</sup> Street Zone with interpretive displays and a lookout but no parking. There would be no hostel or visitor center (or they would be located east of Highway 1). The Resource Management Zone would be increased in acreage. With the relocation of non-resource dependent uses east of Highway 1, some variation of this alternative would be more consistent with Coastal Act Section 30240.

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### The Natural Resource Zone

According to the Plan one of the major checks on the maximum level of visitor use of an area is the prevalence of sensitive habitat areas and the need to maintain a minimum of 700 acres of restored habitat within the Fort Ord Dunes (p.3-64). The 700 acres includes beaches, bluffs, and dunes. Plan Guideline BIO-6 states "Identify and maintain a minimum of 700 acres of park property that will be designated for habitat preservation and restoration. Restore natural landforms and native plant communities within this area. Restore plant communities to the conditions that prevailed in the area prior to Euro-American influences, to the maximum extent practical."

As part of our review of the Plan, Commission staff reread Coastal Commission comments for the 1996 Draft General Plan. The 1996 Plan reported a total acreage of 886 in the park unit of which 137 acres (15.5%) were designated for development. According to the Department a current and more accurate analysis of the geographic extent of the park lands indicate that the total acreage is 990 acres. In the 2004 Preliminary Plan, 11 of the 990 acres are inland of Highway 1 and not in the Coastal Zone. Of the 979 acres of west of Highway 1, 169 acres are within the Plan's four Management Zones (development envelopes) where development can take place. Additionally, there are the 25 acres of existing facilities west of Highway 1, which are leased and/or managed by other entities. The Plan does not appear to include these 25 acres in considering land uses; nonetheless, these acres in conjunction with the 169 acres could create an area of 194 acres or 19.4% of the 979 acres west of highway 1 that are either developed or open to potential development.

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As discussed in the preceding section, Development in the Dunes, the Coastal Act provides priority for protection of California's dwindling dune ecosystem. The number and extent of acres proposed for and available for restoration is not fully clear. Please provide the following clarifications.

- What portion of the 25 acres of existing facilities can be or has been restored, e.g., percolation basins. Do they qualify as "restoration acres" under the HCP?
- What portion of the 785 acres is subject to tidal influences; according to Draft HCP Supplement 73 acres of land in the coastal zone conservation area will be lost through coastal erosion in the 50 year term of the IA.
- How many acres of the NRZ are currently paved. How many unpaved acres are not subject to restoration, e.g., unpaved roads? Please map this.
- Does the 169 acres in the four development envelopes include the access system, e.g. paved roads?
- Does the HCP/HMP reflect the change in acres identified by the State Parks? There are discrepancies between the GP and Executive Summary of the USACE Multispecies HMP, (e.g., see S-14).

- Please map the 700 reserve acres subject to restoration under the HCP/HMP.
- What percentage of the 700 acres to be restored is mitigation for loss of habitat inland of the freeway (i.e., outside the Coastal Zone)?
- If available, please provide a map of the 150 acres of dune areas that have been restored.

Though the HCP/HMP are separate documents included by reference in the GP, it would facilitate planning review if the most fundamental graphics were included in the GP document itself.

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The Plan designates the 785 acres Natural Resources Zone (NRZ), 85 more acres than required by the HCP and Guideline BIO-6. If it is the intention of the Department to maintain the 85 acres as part of the Natural Reserve, the guidelines should be modified to so indicate.

It is understood that to allow for flexibility in design that the development envelopes may encompass a greater area than what may in the future be proposed for development. However, the establishment of the area could be considered a commitment to full development since no standards limiting footprints currently exist.

#### Carrying Capacity

The Plan reports that "Public Resources Code Sections 5001.96 and 5019.5 state that the land carrying capacity shall be determined before any park development plan is adopted, and that attendance at State Park System units shall be held within the limits established by this capacity" (p.3-62). However, no definition of carrying capacity was provided by the code. Because of the visionary nature of the Plan, it uses the management zones in combination with the Plan's Adaptive Management Program to provide the method to address carrying capacity. "Carrying Capacity" is defined qualitatively rather than quantitatively and denotes a level of visitor use that is sustainable and does not cause substantial degradation to the natural and cultural resources or visitor experience (p.3-63). One of the major checks on the maximum level of visitor use of an area is the prevalence of sensitive habitat areas and the need to maintain a minimum of 700 acres of restored habitat within the Fort Ord Dunes..."(3-64). Camping, day use, and parking capacities are approximate only and indicate only potential limitations on peak capacity; actual development may be less. Nevertheless, all future development will need to be consistent with this Plan and as proposed the generality provides a latitude for development in the Management Zones that is hard to evaluate. It is clear from the text that capacity may be less than stated but it is not clear that it may not also be more. Please clarify if the proposed intensities are intended to be maximum intensities.

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#### Habitat Conservation Plan

The April 1997 Installation-Wide Multispecies Habitat Management Plan for Former Fort Ord (HMP) by the USACOE and the Habitat Conservation Plan Supplement to the HMP of September 2000 qualify as a programmatic Habitat Conservation Plan (HCP) in compliance with the federal Endangered Species Act of 1973. A general goal of the HMP is to promote conservation, enhancement and restoration of habitat and populations of special status plant and animal species including Monterey spineflower, sand gilia, coast wallflower and Smith's

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blue butterfly while allowing implementation of a community-based reuse plan that promotes economic recovery after closure of Fort Ord. The HCP is referenced throughout the Preliminary General Plan for Fort Ord Dunes State Park and is the source of the biological goals, management requirements and monitoring strategies for habitat areas. These documents are still in process and not yet finalized.

The USFWS (Diane K. Noda, November 13, 2003) has submitted a detailed review of the HCP recommending clarifications needed to assure development is phased with habitat restoration, providing adequate funding, monitoring standards, mitigating and minimizing incidental take, additional information on the biology and habitat needs of covered species so the link between habitat needs, management techniques and success criteria are clearly understood, etc. Some of these recommendations make direct reference to the Fort Ord Dunes parcels. If appropriate, the Plan should be revised to reflect the comments. Though it goes without saying that the Department must follow the HCP as finalized, for accuracy the Plan should indicate this.

Additionally, according to USFWS it is likely that State Parks would need to obtain direct take authorization from the Service to complete restoration activities and implement recreational use of the area.

#### Environmental Analysis

The Preliminary General Plan for the Fort Ord Dunes State Park is a long term planning document with program level goals and visions. "This General Plan does not approve or commit the Department to specific projects, sites or management plans (p. 4-1). Every identified impact described in the Environmental Analysis Chapter includes the provision that "because implementation information, such as locations of specific facilities and development of project-specific management plans, is not yet known, specific facilities and plans would be reviewed at the time they are proposed for implementation to determine the potential for project-specific impacts and to identify appropriate mitigation measures". And every mitigation measure provides that implementation would reduce the potential program level impacts associated with implementation "however, the department would require examination of many specific facilities and management plans included in the General Plan at the time they are proposed for implementation to determine if further environmental review at a more detailed project-specific and site specific level were necessary".

Hence, most of the analysis of environmental impacts will take place in the future. Comments addressing the major issues raised for compliance with the Coastal Act are discussed in the preceding sections of this document.

#### General Comments

- Though the Plan is programmatic and likely to be implemented incrementally through the next two decades, some sense of how the development and restoration will be phased would be very helpful.
- The abandoned wastewater treatment facility site near Beach Range Road and 8<sup>th</sup> is now under lease to the Marina Coast Water District and, therefore, not under the jurisdiction of the DPR. It is proposed as the site for a potential seawater desalination

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plant. The preferred location for this facility is inland of the freeway. We recommend that the Department work with MCWD to locate any future facility east of Highway 1 to preclude visual and recreational conflicts. Any uses other than parks and restoration in the area west of Highway 1 raises potential conflicts with the Coastal Commissions 1994 Federal Consistency Determination and would require further review by the Commission.

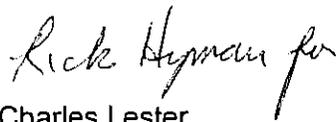
- We recommend that the Department work with the Marina County Water District that in the long term, if feasible, the pump stations in the dunes be relocated to the east side of Highway 1.
- The Department's frontage road which is proposed as a bike/hike through trail parallels and will duplicate the Caltrans paved bike trail. Since the Department's proposed trail may be safer and is quieter, the Department should work with Caltrans to explore the potential to over the long term remove and restore the Caltrans trail area with native vegetation. The paving for the park trail should be narrowed the maximum extent feasible.

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Additional specific comments are attached as Exhibit A. Thank you for the opportunity to comment on the January 2004 draft Preliminary General Plan for Fort Ord Dunes State Park. We look forward to working with you on the planning for this unique coastal area. Please contact Rick Hyman, Chief Planner, if you have any questions.

Sincerely,



Charles Lester  
District Director

cc: Ken Gray, DPR, Monterey  
Scott Hennessey, Planning Director, Monterey County  
Mark Delaplaine, Coastal Commission, San Francisco

EXHIBIT A

Coastal Commission Staff Specific Comments  
Fort Ord Dunes State Park Preliminary General Plan and  
Draft Environmental Impact Report, January 2004

|   |    |
|---|----|
| 1. Table ES-2, Possible Facilities for a Park Support Administrative Zone, does not show overnight lodging as shown on Figure ES-1.   | 13 |
| 2. Figure 1-2 Project Site and Existing Facilities. Please locate existing stormwater outfalls.   | 14 |
| 3. p.2-28 The Northern Foredune Community with only 2,000-10,000 acres remaining is considered "very threatened" by DFG and the Central Dune Scrub Community with only 2,000-10,000 acres remaining is considered "threatened"? Is this correct?  | 15 |
| 4. p. 2-34 Smith's Blue Butterfly habitat restoration is ongoing. Can this be mapped?   | 16 |
| 5. p. 2-59 Stormwater Facilities. Only 4 of the 6, stormwater outfalls are shown on Figure 1-2.   | 17 |
| 6. p. 2-91 Recreation – hang gliding, paragliding, radio controlled glider flying and kite flying over dunes leads to issues of entrance into sensitive dune habitat to retrieve gear, and potential impacts to Western Snowy Plover nesting habitat.   | 18 |
| 7. p. 3-8 AIR-1 Design all new permanent parking and road facilities to accommodate and encourage possible public transit service to interior park locations. Since minimal paved surfaces in the dunes is preferable, larger public transit vehicles may not be appropriate.   | 19 |
| 8. p. 3-9 HYD-3 We recommend that this guideline prohibit park visitors from entering percolation basin areas, rather than making efforts to discourage.  | 20 |
| 9. p. 3-9 HYD-6 This guideline should be more directive, i.e, new facilities <i>shall</i> use water conserving design and equipment; native vegetation <i>shall</i> be used in landscaping; water conserving devices <i>shall</i> be used.  | 21 |
| 10. p. 3-11 GEO-3 This guideline provides for shoreline protective structures in certain cases. However, under the Coastal Act the installation of shoreline protective works is very limited. What structures are you considering for protection? No new permanent structures can be developed in the erosion set back zone. | 22 |
| 11. p. 3-13 NOI-2 This guideline provides for planting additional native vegetation and creating berms between campsites and other facilities etc. It may not be possible to create berms without impacting native habitat. This decision should be left for the specific site plans.   | 23 |
| 12. p. 3-13 NOI-3 Construction should not take place during the nesting/breeding seasons of sensitive wildlife.   | 24 |

EXHIBIT A

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| 13. p. 3-13 through 3-17 Biotic resources. This section contains excellent biological guidelines including development of the Western Snowy Plover Management Program and a long term Vegetation Management Plan. Are these guidelines in process?  | 25 |
| 14. p. 3-14 BIO-2 This guideline should be directive. Active recreational uses and facilities <i>shall</i> be sited beyond the limits of direct and indirect effects for known existing special status plant and wildlife populations.  | 26 |
| 15. p. 3-15 BIO-6 The acreages to be designated for habitat preservation should be identified prior to approval of the final plan. The Commission staff recommends that the Plan designate a larger area for habitat restoration.   | 27 |
| 16. p. 3-16 BIO-8 Please clarify this guideline. It would appear that in order to meet the minimum requirement of 700 acres of restoration, everything outside the 4 development zones would need to be restored, basically creating one large co-extensive habitat. If this is the case, what would constitute the network of habitats? We would recommend that in all cases boardwalks, bridges, etc. be used to assure that in areas to be developed, continuity would be assured. If this guideline is referring to phased restoration, please provide at least a tentative idea of how long restoration will take. | 28 |
| 17. p. 3-16 BIO 11 We support restoration of the stormwater percolation basin to native dune habitat (in 20 years)  | 29 |
| 18. p. 3-17 BIO-19 We suggest that landscaping in the dunes use plants native to the coastal <i>dunes</i> of Monterey Bay.  | 30 |
| 19. p. 3-31 REC-7 Mountain biking would not be an appropriate use in a dune environment.  | 31 |
| 20. p. 3-35 CIR-2 (1) Bicycles may not be appropriate on all trails/trailheads. (2) We support a single controlled vehicle entrance to park.  | 31 |
| 21. p. 3-36 Emergency Vehicle Access – Is there a standard acceptable distance between emergency access points ? Figures ES-2 and 3-2 Potential Circulation do not show emergency access routes. The minimal number of emergency routes over the dunes that is feasible is desirable.   | 32 |
| 22. p. 3-37 CIRC-11 If overflow parking is required for special events, it should be located east of Highway 1. Large-scale special events, such as 4 <sup>th</sup> of July fireworks viewing may not be appropriate in the dune areas.   | 33 |
| 23. p. 3-37 Trails – with few exceptions, e.g., the frontage road, access routes into development areas, the trail system in the park should be boardwalks. Bicycles could be stored at trailhead facilities and users could walk.  | 34 |

EXHIBIT A

- |   |    |
|---|----|
| 24. p. 3-39 OPS-1 The guidelines under this section should be more directive. For example, a consistent, reliable system for collecting visitor use data is essential and should not be "considered" but "required"   | 35 |
| 25. p. 3-39 OPS-4. Same as above. Any bunkers that become unsafe or undermined by coastal erosion should be removed, not considered for removal.  | 36 |
| 26. p. 3-44 REG-5 Consider inclusion of Fort Ord Dunes in the basewide incidental take authorization for the former Fort Ord military reservation as consistent with the requirements of the HMP and HCP. Mitigation Measure Bio-2 provides for surveying development areas for presence of special status plant and animal species and complying with the Endangered species Act etc. Does Mitigation Measure Bio-2 supersede guideline REG-5? | 37 |
| 27. p. 3-52 NR-3 Could emergency access be provided at the north end of the park from the adjacent Marina State Beach to avoid the need to grade the dune?  | 38 |
| 28. p. 3-52 NR-1 and NR-5 Paved and stabilized trails should be limited to existing paved areas. Boardwalks should be used in the NRZ as in the adjacent Marina State Beach   | 39 |
| 29. p. 3-52 NR-6 It would be helpful if the Plan provided more discussion on the potential development of the railroad right of way and how it might impact the park lands. If there is a potential for loss of natural resource acres to rail transportation uses, the plan should reserve additional restoration acreages to compensate for the loss.   | 40 |
| 30. p. 3-53 through 3-62 These guidelines address facility development. Comments are in the body of this letter.  | 41 |
| 31. p. 4-23 Impact Bio-1 This impact statement says development would impact disturbed plant communities but not negatively affect native habitat; however, both the 8 <sup>th</sup> Street and 1st Street zones contain Monterey spineflower. Please explain.  | 42 |

D CHARLES LESTER, CALIFORNIA COASTAL COMMISSION

- D-1 The Coastal Commission indicates that development at Fort Ord Dunes would be subject to coastal development permit requirements. The California Coastal Commission's jurisdiction of the coastal portion of Fort Ord Dunes is noted on General Plan/EIR page 2-67. Upon transfer of Fort Ord Dunes to the state and upon obtaining funding for General Plan projects, the Department would begin implementation of the General Plan. The Department would comply with the Coastal Commission requirements and recommendations (including necessary permits) during the planning and permitting stages of General Plan projects, as required and as noted on General Plan/EIR page 2-67. Prior to property conveyance, Fort Ord Dunes would continue to be managed by the Army and subject to the federal consistency process. It is noted that the Coastal Commission has been added as a coordinating agency, along with several other agencies, for development of a Unit Trails Plan (see Chapter 3, Preliminary General Plan and Environmental Impact Report Text Changes). Development of a Public Works Plan may be considered by the Department at a later time, but is not included in the General Plan/EIR process.
- D-2 The Coastal Commission provides overall support for the General Plan/EIR and references significant portions of General Plan/EIR text. This comment is noted.
- D-3 The Coastal Commission indicates that all coastal dunes are environmentally sensitive habitat. This comment is consistent with potential uses and facilities discussed in General Plan/EIR Chapter 3, The Plan. The possible exception is the potential campground, which may not be limited to environmental camping. General Plan development and designation of management zones carefully considered the natural, cultural, social, and physiographic resources of park areas, as well as physical connections such as existing roadways, and existing development/disturbance that allow for useful land management units. It is also noted that areas of management zones that are not proposed for development would be restored to natural condition and that a major feature of the Fort Ord Dunes State Park General Plan is the restoration of degraded coastal dunes. While Chapter 3, The Plan, includes some potential uses and facilities that could be interpreted as conflicting with some Coastal Act policies; the overall planning effort described above attempted to balance Coastal Act consistency, resource protection, and regulatory requirements with provision of public recreation use at the General Plan level.

Balancing the Coastal Act policies for resource protection, providing public access, and protecting scenic and other Fort Ord Dunes resources requires the Department and the Coastal Commission work together in planning area- and site-specific development. In addition, site-specific planning and survey would be required to identify any areas of resource sensitivity that may occur within the designated management zones and to recommend site design and use strategies to minimize disturbance of resources within each management zones, as well as appropriate mitigation.

As described in the Department consideration of Comment D-1, the Department may consider development of a Public Works Plan in the future, which would allow the Coastal Commission to review and establish site requirements that apply to the entire property and implementation of all elements of the General Plan, rather than require the Coastal Commission to analyze project requirements on a case-by-case basis.

- D-4 The Coastal Commission recommends mapping of existing impervious surfacing and buildings. General Plan/EIR Figure 1-2 exhibits facilities and impervious areas existing in 2003 (the date of the aerial photo base) such as roads and parking lots. This information was used in the analysis of key elements posing constraints or potentials for development of management zones, through use of ArcGIS Spatial Analyst. As noted above, areas of management zones that are not proposed for development would be restored to their natural condition. Because existing impervious surfaces and buildings may be restored to natural conditions, these features were not quantified as separate features within each management zone. The management zones and zone acreages do not include existing facilities managed by other agencies, such as percolation basins, the wastewater treatment plant, and the wastewater pump stations. In addition, Beach Range Road and an adjacent buffer would likely be retained as a paved road under General Plan implementation and therefore was not included within the management zones.
- D-5 The Coastal Commission supports the General Plan's approach regarding adaptive reuse of existing facilities, and guidelines that advocate placement of some park facilities in nearby, non-park or east of State Route 1 park areas. This comment is noted.
- D-6 The Coastal Commission indicates that some variation of the Minimal Facility Alternative would be more consistent with Coastal Act Section 30240. See the response to Comment 10-11.

D-7 The Coastal Commission asks several questions regarding the acreage of the Natural Resource Management Zone and how it relates to the Habitat Management Plan requirement for 700 acres of restored coastal dune habitat. The Coastal Commission requests explanation for the number and extent of areas proposed for and available for restoration. The Department has not designated the minimum of 700 acres subject to restoration under the HMP/Draft HCP and would undertake this effort as part of General Plan implementation as required in General Plan/EIR Guideline BIO-6. While the minimum of 700 acres of restored habitat would chiefly be located within the 785 acre Natural Resource Management Zone, restored habitat would also be located in other zones. The Department does not intend to site park facilities and uses throughout each of the four active management zones and areas of the zones that are not proposed for development during area- and site-specific planning would be restored to a natural condition. Further, areas of Fort Ord Dunes that are currently developed may be designated for restoration, if appropriate and if the Department determines that adaptive reuse of existing development is not desired. Area- and site-specific management zone development would be analyzed, designed, and implemented to designate the parkwide restoration areas in concert with designation of facility development sites. While the management zones do not designate specific sites for development of facilities or determine the number of facilities to be developed, the Department anticipates that significant portions the active management zones would be retained as restoration areas and that overall restoration acreage would exceed the 700 acre requirement. Since the decision made under the General Plan/EIR is programmatic and no specific commitment of resources is made by the decision, the level of detail presented is appropriate.

The Coastal Commission requests information regarding the 25 acres of existing facilities identified in the General Plan/EIR. As noted in the Department consideration of Comment D-4 above, and as described on General Plan/EIR page 3-48, areas of existing development managed by other agencies are not included within the park management zones. Further, these areas would not be considered part of the Fort Ord Dunes restoration efforts to be implemented in the near future. However, guideline BIO-11 calls for restoration of the existing percolation basins at the end of their period of use (approximately 20 years). Similarly, should other facilities currently under the management of other agencies be removed and management of those areas transferred to the Department, it is likely that these areas would be restored and included in the Natural Resource Management Zone.

The Coastal Commission asks what portion of the Natural Resource Management Zone is subject to tidal influences. The Natural Resource Management Zone includes the entire Fort Ord Dunes coastline and is therefore subject to tidal influences. The predicted extent of coastal erosion at Fort Ord Dunes over the next 100 years is displayed on General Plan/EIR Figure 2-2, indicating the worst case scenario where an average of 7 feet of coastal erosion occurs annually. As described above, the Natural Resource Management Zone does not represent the entire area that would be included in the restoration area and the Department would work with the appropriate regulatory agencies to ensure that restoration requirements are satisfied as the ongoing, natural coastal erosion process progresses.

The Coastal Commission asks what portion of the management zones include paved areas, and whether the paved areas are subject to restoration. See the Department consideration of Comment D-4. As noted, it is expected that Beach Range Road would be retained for long term park use and therefore was not included within any of the management zones. Each of the management zones includes some existing paved areas (roads, parking areas, etc.) that could be retained or restored during park development, depending on area- and site-specific planning, as described above. Should paved areas be retained during park development, they would not be considered within the required restoration acreage. Planning for active management zones attempted to include some existing roads and disturbed areas for use as potential park access routes and facility sites in order to reduce potential disturbance of areas of sensitivity during facility development and use. However, as described above, areas of existing development that are not proposed for reuse may be restored. Existing paved areas within the Natural Resource Zone would be restored where they are not retained for use as trails or for emergency access.

The Coastal Commission requests a map of the dune restoration project area associated with 1998 lead remediation. The Department's annual habitat mitigation and monitoring reports include the requested maps, which were used for preparation of this General Plan/EIR (including designation of management zones) and are available for review through the Monterey District office.

The Coastal Commission includes a request for clarification and modification of information included or relevant to the *Installation-wide Multispecies Habitat Management Plan for Former Fort Ord, California* and the associated Draft Habitat Conservation Plan. Modification of the Habitat Management Plan and Habitat Conservation Plan to address the

- current and more accurate analysis of the geographic extent of park lands would require action by the U.S. Army Corps of Engineers and the Fort Ord Reuse Authority. It is noted however that the U.S. Army's former Fort Ord military reservation property transfer parcel database indicates acreage for future California Department of Parks and Recreation conveyance that is consistent with the total acreage included in the General Plan/EIR for the future Fort Ord Dunes State Park. Additional inquiry regarding details of the Habitat Management Plan or the Habitat Conservation Plan (i.e., mitigation for areas east of Fort Ord Dunes) are not related to the Fort Ord Dunes State Park General Plan Preliminary General Plan/Draft EIR and the commenter is referred to the U.S. Army Corps of Engineers and the Fort Ord Reuse Authority for further information. The Department would continue to coordinate with those agencies, and other agencies, as appropriate, regarding regional natural resources planning, including the basewide Habitat Management Plan and Habitat Conservation Plan.
- D-8 The Coastal Commission requests clarification regarding carrying capacity. See the response to Comment 5-10 regarding maximum facility capacities. In addition, the Department recognized the need to clarify some General Plan/EIR text regarding maximum facility capacities. See Chapter 3, Preliminary General Plan and Environmental Impact Report Text Revisions.
- D-9 The Coastal Commission indicates that the Habitat Conservation Plan is not yet finalized and that the General Plan/EIR would be subject to the Habitat Conservation Plan as finalized. This comment is consistent with information included in General Plan/EIR page 2-70. General Plan development includes Fort Ord Reuse Authority and Habitat Management Plan coordination, and compliance with applicable permitting and regulatory requirements, as required in the regional planning guidelines of the General Plan/EIR (see pages 3-44 through 3-45).
- D-10 The Coastal Commission recommends inclusion of phasing information. See the response to Comment 5-11.
- D-11 The Coastal Commission provides comments regarding use of facilities that would be under easement to the Marina Coast Water District, following conveyance of Fort Ord Dunes to the California Department of Parks and Recreation. As noted in Comment D-11, use of this site is not under the jurisdiction of the Department. The Department agrees that this site may not be the ideal location for a potential future seawater desalination plant. Future development of a seawater desalination plant by the Marina Coast Water District would require CEQA compliance and

- obtainment of applicable regulatory permits, such as those of the California Coastal Commission, as required for Coastal Act compliance. As part of existing and ongoing participation in regional planning, and as called for in General Plan/EIR Guideline REG-6, the Department would review and comment on any future project proposals issued by the Marina Coast Water District.
- D-12 The Coastal Commission proposes that the Department coordinate with the California Department of Transportation for restoration of their trail, which is located adjacent to Fort Ord Dunes. As part of parkwide and regional planning, the Department intends to coordinate with the Department of Transportation, and other applicable agencies regarding preparation of a Unit Trails Plan. This coordination could include discussion of Department participation in potential restoration of the Department of California trail, should that trail be removed.
- D-13 The Coastal Commission indicates that General Plan/EIR Table ES-2 does not include overnight lodging for the Park Support/Administrative Management Zone. Table ES-2, line 1, under Visitor and Administrative Uses indicates that the Park Support/Administrative Management Zone could include indoor overnight uses (east of State Route 1). Possible facilities include a youth hostel (Table ES-2, line 2). This is the extent of overnight lodging that is considered in the General Plan/EIR.
- D-14 The Coastal Commission provides comments to Figure 1-2. Department staff identified minor modifications applicable to Figure 1-2, among which is identification of additional outfalls. See Chapter 3, Preliminary General Plan and Environmental Impact Report Text Revisions
- D-15 The Coastal Commission inquires as to the California Department of Fish and Game determinations for Northern Foredune and Central Dune Scrub communities. The California Department of Fish and Game categorizes state ranking and threat designations for sensitive communities and the information on General Plan/EIR page 2-28 is correct in reference to these designations.
- D-16 The Coastal Commission inquires as to whether Smith's Blue Butterfly habitat restoration can be mapped. The Department's annual habitat mitigation and monitoring reports include the requested maps, which were used for preparation of the General Plan/EIR and are available for review through the Monterey District office.
- D-17 The Coastal Commission provides further comments to Figure 1-2. See the Department consideration of Comment D-14.

- D-18 The Coastal Commission comments that dune over flight can result in potential impacts to sensitive dune habitat. See the Department consideration of Comment A-14.
- D-19 The Coastal Commission comments that larger public transit vehicles may not be appropriate at interior park locations. As part of General Plan transportation planning and regional planning coordination, the Department would coordinate with public transit providers to design facilities that would accommodate appropriately sized vehicles.
- D-20 The Coastal Commission recommends prohibition of park visitors from entering percolation basin areas. Though not a part of the Natural Resource Management Zone, the percolation basins are located within this zone. Public access within this zone is limited to use of multi-use stabilized and/or paved trails, unpaved trails, boardwalks, vista points, and outdoor exhibit stations/kiosks. Use of non-public use areas is prohibited, including access to percolation basins.
- D-21 The Coastal Commission recommends requiring water conserving design and devices. See the response to Comment 11-4.
- D-22 The Coastal Commission indicates that appropriate use of shoreline protective measures is very limited and no permanent structures should be developed in the erosion setback zone. See the response to Comment 11-5.
- D-23 The Coastal Commission comments that noise reducing berms could impact native habitat and would require area- and site-specific planning. This comment is noted. The Department selected an area within the Storage Bunker Management Zone that may be appropriate for camping specifically because this area represents the most accessible, yet secluded area of the unit (see General Plan/EIR pages 3-57 through 3-59). This area includes areas of existing ground disturbance, including pavement, graded areas, and berms. This area also includes tree lines that would serve to limit the visual and acoustical effects associated with a potential campground. However, the Department acknowledges that project level campground planning would be required to ensure that design, construction, and implementation of a campground project would avoid all potential resource impacts to the extent feasible, including further consideration of native habitat effects associated with construction of berms and other campground features.
- D-24 The Coastal Commission comments that construction should not occur during the nesting/breeding seasons of sensitive wildlife. Guideline NOI-3

- indicates that construction during the nesting/breeding seasons of sensitive wildlife known to occur in the project vicinity be avoided, to the extent feasible. In some area- and site-specific cases, construction during the nesting/breeding season of sensitive wildlife may occur, with appropriate mitigation (i.e., survey for active nests, site activity with prescribed buffers), consistent with the Endangered Species Act and applicable federal and state regulations.
- D-25 The Coastal Commission indicates support for biotic resources goals and guidelines and inquires whether the Western Snowy Plover Management Program and Vegetation Management Plan are in process. While the Department conducted a large-scale native dune restoration project and non-native plant control project at lead remediation and recontoured sites, with annual monitoring ongoing (see General Plan/EIR pages 2-30 through 2-33), development of the Western Snowy Plover Management Program and Vegetation Management Plan recommended in the goals and guidelines of the General Plan/EIR has not yet commenced.
- D-26 The Coastal Commission comments that active recreation uses and facilities should be sited beyond the limits of direct and indirect effect for known existing special-status plants and wildlife populations. While the Department intends to locate active recreational uses and facilities beyond these sensitive areas, in some limited area- and site-specific cases, such as siting boardwalks in dune areas, recreational uses and facilities may be appropriate, where consistent with the Endangered Species Act and applicable federal and state regulations. The Department would undergo area- and site-specific planning for implementation of General Plan elements and would determine if further environmental review at a more detailed level were necessary.
- D-27 The Coastal Commission comments that acreages for habitat preservation should be included in the General Plan. See the Department consideration of Comment D-7. While the habitat restoration acreage has not been designated, the Department anticipates that significant areas of active management zones would be available for restoration and that overall restored habitat would exceed the required 700 acres.
- D-28 The Coastal Commission requests clarification of General Plan/EIR guideline BIO-8. See the Department consideration of Comment D-7. The intent of guideline BIO-8 is to ensure connectivity of areas being restored parkwide. See also the response to Comment 5-11 regarding General Plan implementation and phasing.

- D-29 The Coastal Commission provides support for General Plan/EIR guideline BIO-11. This comment is noted.
- D-30 The Coastal Commission comments that landscaping should include plants native to the coastal dunes of Monterey Bay. The Department is aware of the desire to use plant materials with a local genetic composition and does so, to the extent possible.
- D-31 The Coastal Commission comments that mountain biking would not be an appropriate use in a dune environment and comments on potential park access/trailheads. Guideline REC-7 is not intended to suggest appropriate uses for Fort Ord Dunes, but to consider innovative recreational experiences and trends as they arise, if appropriate and consistent with park and regional recreational, land use, and resource management goals. Mountain biking is cited within Guideline REC-7 as an example of a recreation trend that has arisen in the recent past, and is not suggested as a specific use at Fort Ord Dunes. The Department also recognizes that some trail uses, such as bicycling, would not be appropriate on all trail types or locations. Consideration of appropriate uses on park trails would be addressed during development of the Unit Trails Plan (Guideline CIR-12). The Coastal Commission preference for a single vehicle entrance to the park is noted.
- D-32 The Coastal Commission comments that the minimal number of emergency routes is desirable. There is no standard acceptable distance between emergency access points. The Department intends to utilize existing paved and unpaved roadways to the extent possible for emergency and operational activities. In addition, it is expected that public beach access routes would be utilized for emergency and operational activities along the coastline, as necessary. Emergency access planning (Guideline CIR-7) would establish the minimum number of access routes required to protect park users while also protecting park resources by minimizing disturbance by park users as well as by operational activities.
- D-33 The Coastal Commission comments that overflow parking should be located east of State Route 1. This comment is noted and is consistent with General Plan/EIR guideline CIR-11. The Department has not considered specific special event uses at Fort Ord Dunes at this time, but acknowledges that there may be request for such use in the future. The District Superintendent would review applications for special event use, in consideration of the General Plan goals and guidelines, state and other regulatory requirements, and the input of regional land use planning agencies, such as the Coastal Commission.

- D-34 The Coastal Commission recommends trail use requirements (i.e., use of boardwalks and bicycle use restrictions). Consideration of trail types and locations, and designation of appropriate uses on park trails would be addressed during development of the Unit Trails Plan (Guideline CIR-12). The California Department of Transportation and the Transportation Agency for Monterey County requested that Guideline CIR-12 be modified to include coordination with several regional land use planning agencies, including the Coastal Commission, and the Department has implemented the requested text change (see the responses to Comments 6-3 and 9-3). The Coastal Commission preferences, and other recommendations and requirements, for trail use types and uses would be reviewed during implementation of Guideline CIR-12 as part of that coordinated planning effort.
- D-35 The Coastal Commission recommends requiring establishment of a visitor use data collection system. A reliable system for determining visitor use data is considered an essential tool for making informed decisions about future area-specific projects. However, such data collection efforts are very costly. As funding becomes available for visitor use data collection, the Department would welcome suggestions on how to improve data collection efforts.
- D-36 The Coastal Commission recommends removal of any bunkers that are undermined by coastal erosion or otherwise become unsafe. Should bunkers become unsafe or undermined by coastal erosion, the Department would consult with applicable regulatory agencies to evaluate options and requirements for protection or removal of these structures.
- D-37 The Coastal Commission inquires as to relationship between guideline REG-5 and mitigation measure Bio-2. Upon approval of the basewide incidental take authorization, the terms of the authorization area- and site-specific mitigation, such as site-specific surveys and Endangered Species Act compliance, would be considered consistent and in addition to implementation of guideline REG-5.
- D-38 The Coastal Commission inquires whether allowing emergency access from adjacent Marina State Beach would avoid the need to grade dunes within the Natural Resource Management Zone. See the Department consideration of Comment D-32. The need, benefits, and constraints of use of Marina State Beach as a potential emergency access point for Fort Ord Dunes would be considered during emergency access planning (Guideline CIR-7).

D-39 The Coastal Commission provides comments regarding trail types within the Natural Resource Management Zone. See the Department consideration of Comment D-34.

D-40 The Coastal Commission inquires regarding potential Transportation Agency for Monterey County development adjacent to the Natural Resource Management Zone. This project is undergoing planning and CEQA compliance that is separate from the Fort Ord Dunes State Park planning effort under the Department. The Coastal Commission is referred to the Transportation Agency for Monterey County regarding planning within lands being conveyed to that agency.

At this time, a land transfer from the Department to the Transportation Agency for Monterey County is not proposed; however should such a transfer be proposed in the future, the Fort Ord Dunes State Park restoration acreage would need to be addressed. As described in the Department consideration of Comment D-7, the required 700 acres of restoration areas are not limited to the Natural Resource Management Zone.

D-41 The Coastal Commission notes that guidelines on facility development are addressed elsewhere in their comment letter. This comment is noted.

D-42 The Coastal Commission comments that Impact Bio-1 may not address Monterey spineflower populations within the 8th Street and 1st Street zones. See the Department consideration of Comment D-7. As described, the management zones do not designate specific sites for development of specific facilities or determine the number of facilities to be developed. Area- and site-specific management zone development would be analyzed, designed, and implemented to maximize use of previously disturbed areas (due to either existing facilities or prevalence of disturbed plant communities) for facility development and public use and to avoid areas of significant resource values within the active management zones, to the extent feasible. Implementation of biological resources guidelines referenced in Impact Bio-1 would further guide site development that avoids sensitive resources and includes measures that would ensure that project construction does not result in significant biological resource impacts. As noted, project-level planning and compliance, as required, would further address potential biological resource impacts.



# California State University, Monterey Bay

The Associated Students  
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24 March 2004

Mr. Jason Spann  
Project Coordinator  
California Department of Parks and Recreation  
Northern Service Center  
One Capitol Mall, Ste. 500  
Sacramento, CA 95814

**RECEIVED**

APR 02 2004

**NORTHERN SERVICE CENTER**

**Subject: Comments to Fort Ord Dunes State Park Preliminary General Plan and Draft Environmental Impact Report**

Dear Mr. Spann:

Thank you for accepting public comments past the deadline. Below are comments to the Fort Ord Dunes State Park Preliminary General Plan and Draft Environmental Impact Report:

For Summary of Key Goals and Guidelines, under CIR-1, to “Consider Fort Ord Reuse Authority, Marina, Seaside, Monterey County, Transportation Agency for Monterey County, and Caltrans transportation and circulation goals, guidelines, and traffic levels of service with respect to potential park entrances and travel corridors approaching entrances.” It would seem also practical to consider California State University, Monterey Bay in the list of agencies to consider. California State University, Monterey Bay, located adjacent to the proposed Fort Ord Dunes State Park, must be concerned about potential park entrances and travel corridors as well.

1

Under Summary of Key Goals and Guidelines, under CIR-13, it may be wise to include narrative describing the importance of recognizing the Fort Ord Dunes State Park as an important route connection between the Monterey Bay Coastal Recreation Trail and the former Fort Ord. Currently, there is no connection between the Monterey Bay Coastal Recreation Trail and the former Fort Ord community.

2

Under Summary of Key Goals and Guidelines, under HAZ-1, it may be appropriate to specifically include the United States Environmental Protection Agency to the list of regulatory agencies (the Army, California Department of Toxic Substances Control are already listed.)

3

On page 1-4, when stating “Unlike the high-use beaches in Sand City, Seaside, and Monterey, the bluffs and surf noise separate this area from direct contact with the urban scene,” consider Pacific Grove and Carmel in the list.

4

On page 2-1, when stating “The former Fort Ord military reservation, residential, commercial, and recreation land uses dominate the area surrounding Fort Ord Dunes,” include “educational” and “research” uses as well, as these land uses make up a large percentage of the former Fort Ord military reservation.

5

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|---|----|
| On page 2-3, second bullet, correct spelling from “Imjun Parkway” to “Imjin Parkway”.   | 6  |
| On page 2-4, under “Regional Recreation Uses,” include Asilomar State Beach in Pacific Grove.   | 7  |
| On page 2-7, under “The monitoring station in Monterey (on Silver Cloud Court) is the closest to Fort Ord Dunes at about five miles to the south. This station monitors ozone levels,” note that the monitoring station in Monterey is south east of the Fort Ord Dunes.  | 8  |
| On page 2-11, under “Groundwater” states: “The former Fort Ord military reservation was placed on the National Pollutant List Superfund list in 1990 due to the extent of groundwater contamination resulting from Army operations. Although the majority of groundwater impacted areas are outside Fort Ord Dunes, a portion of Fort Ord Dunes is underlain by impacted groundwater (see Hazards and Hazardous Materials, below). A groundwater treatment system was constructed to remediate volatile organic compounds concentrations and began operation in 1994; it is anticipated that the system will operate for 30 years in order to reach water quality cleanup objectives (USACOE, 2002).” It may be appropriate to add more information about groundwater cleanup activities. In addition, groundwater was not the only reason that the former Fort Ord was placed on the NPL Superfund List. | 9  |
| Caption for Figure 2.6, Fiesta Mural, it states “Now located in Pomeroy Hall at California State University Monterey Bay”. The location of the mural is in fact the University Center Ballroom at California State University, Monterey Bay.  | 10 |
| Under aesthetic resources, page 2-49, include the former Hayes Hospital (currently DMDC center, for Department of Defense) as well as CSUMB campus buildings (current Science Building, future 4-story CSUMB Library).  | 11 |
| On page 8, under Meteorology and Air Quality, include narrative on the prescribed vegetation burns on the Former Fort Ord. These prescribed burns occur up to twice per year for the next several years, and impacts air quality at the Fort Ord Dunes State Park. This should be detailed elsewhere in the General Plan.   | 12 |
| On page 3-9, Hydrology, HYD-6, specifically identify low-flow toilets and waterless urinals as options to reduce water usage.   | 13 |
| On page 3-8, Hydrology, include water source and agency water will be supplied from   | 14 |
| On page 3-22, it is very important to mention the potential impacts of lead on human health and lead levels, it is important that this remain in the general plan.  | 15 |
| Under guideline REC-3 on page 3-31, possibly collaborate with California State University Monterey Bay on a regional visitor center.  | 16 |
| Under guideline CIR-1 on page 3-35, include California State University Monterey Bay’s circulation goals, guidelines, and traffic levels with respect to park entrances and travel corridors.   | 17 |
| Under Public Safety & Law Enforcement, page 3-41, include jurisdiction which would respond to ocean-related incidents (U.S. Coast Guard, Pacific Grove Ocean Rescue, etc.)  | 18 |

On page 4-4, under Agricultural Resources, correct grammatical error to state that "Fort Ord Dunes is not zoned as farmland and no impact would occur."

If you have any questions or concerns regarding the comments, please feel free to contact me directly via e-mail at rojan@csumb.edu. I look forward to receiving responses to the comments provided. Thank you very much for your continued work and support.

Sincerely,



Nat Rojanasathira  
Environmental Senator, Associated Students  
California State University, Monterey Bay

Interim Chair, Fort Ord Community Advisory Group

- E NAT ROJANASATHIRA, CALIFORNIA STATE UNIVERSITY  
MONTEREY BAY, THE ASSOCIATED STUDENTS
- E-1 The Associated Students requests coordination with California State University Monterey Bay under Guideline CIR-1. The California Department of Transportation also requested modification of Guideline CIR-1, which led the Department to consider other coordinating parties that may be appropriately listed under this guideline. For instance, the Department recognizes that land users of the former Fort Ord military reservation may have land use and transportation plans that differ from or expand upon Fort Ord Reuse Authority plans. See the response to Comment 6-3.
- E-2 The Associated Students request inclusion of detail regarding potential connection between Monterey Bay Coastal Recreation Trail and the former Fort Ord military reservation under Guideline CIR-13. General Plan/EIR Guideline CIR-13 recognizes the importance of unifying public use areas within the non-contiguous portions of Monterey Bay, which includes the former Fort Ord military reservation. Guideline CIR-13 is intended to address regional trail connections, rather than focus specifically on those areas in the immediate vicinity of Fort Ord Dunes.
- E-3 The Associated Students request inclusion of the U.S. Environmental Protection Agency to Guideline HAZ-1. General Plan Guideline HAZ-1 calls for the Department to coordinate remediation and site management to appropriate state and federal standards by working with the Army, the California Department of Toxic Substances Control, and other responsible regulatory agencies. The Army and the California Department of Toxic Substances Control are currently working with the Department to address remediation and site management and are therefore identified as the main responsible agencies included under Guideline HAZ-1. The U.S. Environmental Protection Agency is considered among other responsible regulatory agencies the Department would coordinate with, as appropriate, in implementing Guideline HAZ-1.
- E-4 The Associated Students recommend inclusion of additional beaches to a description of high-use beaches on General Plan/EIR page 1-4. The General Plan/EIR Sense of Place description (page 1-4) focuses of the character and enduring values of Fort Ord Dunes. The comparison between Fort Ord Dunes and high-use beaches was not intended as an exhaustive list of regional beaches, but to provide a few relevant, nearby examples. The addition of other high-use beaches would not improve the value of the Sense of Place description or affect the environmental issues addressed in the General Plan/EIR.

- E-5 The Associated Students request the inclusion of educational and research uses in the summary description of surrounding land uses included on General Plan/EIR page 2-1. The text referred to in this comment is a brief introduction that lists land uses adjacent to Fort Ord Dunes. As noted, the introduction lists the former Fort Ord military reservation as an adjacent land use, and therefore all uses within this area are incorporated. The introduction is followed by more detailed descriptions and Figure 2-1 and the description of the former Fort Ord military reservation both note the California State University Monterey Bay within this land use area.
- E-6 The Associated Students note a typographical error on General Plan/EIR page 2-3. The Department also noted this error; see Staff-initiated Text Changes in Chapter 3 of this document.
- E-7 The Associated Students request that Asilomar State Beach be described under Regional Recreation Uses. The General Plan/EIR includes detailed description of three regional recreation uses located in very close proximity to Fort Ord Dunes, and more general descriptions of other recreation uses within the immediately adjacent communities. Other Monterey Bay recreation opportunities, such as public beach access, which would include Asilomar, were noted on page 2-5 but not specifically described. Listing of all regional recreation opportunities would not improve of the Existing Conditions description or affect the environmental issues addressed in the General Plan/EIR.
- E-8 The Associated Students request an editorial change regarding the location of an offsite air quality monitoring station. The location of the Monterey monitoring station on Silver Cloud Court could be considered to be either south or southeast of Fort Ord Dunes.
- E-9 The Associated Students request further description of groundwater cleanup efforts being undertaken by the U.S. Army on General Plan/EIR page 2-11. The description of groundwater quality on General Plan/EIR page 2-11 summarizes information from the Hazards and Hazardous Materials section of Chapter 2, Existing Conditions and Issues and refers the reader to that section for more information. Further information requested by the Associated Students may be found on General Plan/EIR pages 2-64 and 2-65. The Department noted a minor clarification required regarding National Priority List designation; see Staff-initiated Text Changes in Chapter 3 of this document.
- E-10 The Associated Students provide clarification for location of a mural from the former Stilwell Hall. This comment is noted and would be addressed

- as appropriate during implementation of the Final General Plan (i.e., implementation of the Interpretation program).
- E-11 The Associated Students request addition of two structures in the summary of Visual Resources, Scenic Characteristics, and Viewsheds on General Plan/EIR page 2-49. The noted description provides an overview of views and features visible from Fort Ord Dunes and is not intended to be inclusive of all visible features.
- E-12 The Associated Students request that description of prescribed burning at inland portions of the former Fort Ord military reservation be added to General Plan/EIR page 2-8 and elsewhere. General Plan/EIR page 2-9 describes the local air pollutant sources in and near Fort Ord Dunes. Given the distance of prescribed burn activities from Fort Ord Dunes, and infrequency of events, prescribed burning was not considered a primary source of air pollutant affecting Fort Ord Dunes. The General Plan addresses park uses that could generate potential air quality pollutants (i.e., campfires and vehicular trips associated with park use), but has no authority over prescribed burns conducted by other agencies.
- E-13 The Associated Students recommend detailed water conservation strategies. The Department would further detail water conservation strategies during area- and site-specific planning for implementation of General Plan elements.
- E-14 The Associated Students request designation of water source and agency within Hydrology guidelines (General Plan/EIR page 3-8). Water supply issues are addressed under the General Plan/EIR Park Operations and Facilities topic, rather than Hydrology. As described on General Plan/EIR page 2-59, the Marina Coast Water District supplies water to the former Fort Ord military reservation and the Fort Ord Reuse Authority has designated an annual allocation of 45 acre-feet for Fort Ord Dunes State Park.
- E-15 The Associated Students refer to the description of interpretive themes on General Plan/EIR page 3-22, noting the importance of this theme. This comment is noted.
- E-16 The Associated Students request inclusion of California State University Monterey Bay under Guideline REC-3. General Plan/EIR Guideline REC-3 calls for the Department to consider development of a Regional Visitor Center and pursue opportunities to combine efforts with other agencies with similar interpretive missions. This guideline does not specify potential coordinating agencies, but would allow for coordination

- with the California State University Monterey Bay and other organizations, consistent with implementation of Regional Planning Guidelines REG-1 and REG-4.
- E-17 The Associated Students request coordination with California State University Monterey Bay under Guideline CIR-1. See the Department consideration of Comment E-1.
- E-18 The Associated Students request designation of jurisdictions that would respond to ocean-related incidents within the Public Safety and Law Enforcement guidelines section on Draft General Plan/EIR page 3-41. The introductory text preceding the goals and related guidelines for each resource of environmental topic of Chapter 3, The Plan summarizes information included in Chapter 2, Existing Conditions and Issues, establishing context as to the necessity of the guidelines that follow. Detail regarding ocean safety responsibility is found on General Plan/EIR pages 2-59 and 2-60 and was not determined necessary for the page 3-41 text referenced in this comment.
- E-19 The Associated Students note a typographical error on General Plan/EIR page 4-4. This error was also noted by the Department; see Staff-initiated Text Changes in Chapter 3 of this document.



REPLY TO  
ATTENTION OF

**DEPARTMENT OF THE ARMY**  
Defense Language Institute Foreign Language Center and Presidio of Monterey  
Directorate of Environmental and Natural Resources Management  
Bldg 4463 Gigling Rd – P.O. Box 5004  
Monterey, California 93944-5004

APR 01 2004

Directorate of Environmental and Natural  
Resources Management

**RECEIVED**

APR 05 2004

**NORTHERN SERVICE CENTER**

California Department of Parks and Recreation  
Northern Service Center  
One Capitol Mall, Suite 500  
Sacramento, CA 95814  
(ATTN: Jason Spann, Project Coordinator)

Dear Mr. Spann:

Thank you for the opportunity to review the “Fort Ord Dunes State Park Preliminary General Plan and Draft Environmental Impact Report,” dated January 2004. The Presidio of Monterey Directorate of Environmental and Natural Resources Management staff have reviewed the document and provided the following comments for your consideration:

**General**

- 1. The preliminary general plan/draft EIR is well organized and written. | 1
- 2. Projects located on federal land are subject to compliance with the National Environmental Policy Act (NEPA) requirements. Our understanding is your project will be implemented after the State of California obtains the property. However, the Preliminary General Plan and Draft EIR is being completed with the property still under federal ownership. Suggest that your legal office review the applicability of NEPA to this project. Determination should be made regarding the applicability of both CEQA EIR and NEPA Environmental Impact Statement requirements in certifying the final document. | 2
- 3. The document should state current conditions of the property. Text regarding environmental conditions involving building demolition, soil erosion and site remediation need to be updated. | 3

**Executive Summary**

- 1, Table ES-1, page ES-7. “*Hazards and Hazardous Materials*” HAZ-1 states the CDPR will “Work closely with the Army...to develop procedures that would assure that all contaminated sites within the Park are remediated...” Groundwater remediation continues to be monitored. However, the U.S. Army’s environmental remediation procedures and processes for lead/other metals are completed. Furthermore, the groundwater is not part of the potable water supply. This point is extremely important and should be emphasized in the document. Similar text on pages 2-1, 2-68, 3-22 and 3-43 should be revised accordingly. | 4

2. Statements in Table ES-1 conflict with the description of cleanup outlined in Chapter 2, page 2-62 and beyond. The cleanup descriptions state human health risks and hazards associated with metals in the soil are considered unlikely. The text should be reworded to be project-oriented and reference or identify site-specific hazards/risks associated with a particular action/project. 4 cont.

3. The text states that the CDPR will perform a site-specific review of soil data within identified lead-impacted areas prior to development. Additional environmental remediation work of this nature will be completed by the CDPR at the discretion of the California Department of Toxic Substances Control (DTSC). The U.S. Army will transfer this property based upon the work completed and approved by the USEPA and CalEPA. 5

4. There is a significant amount of information regarding environmental site remediation on the former Fort Ord website, [www.fortordcleanup.com](http://www.fortordcleanup.com) and on file at the Fort Ord Administrative Record. This information is available for use by the CDPR to revise their document. 6

## **CHAPTER 1** INTRODUCTION

1. Page 1-1. “**PURPOSE AQUIRED**” the word **acquired** is misspelled.  
2. Figure 1-2 labeled “Old Village Sewage Treatment Plant” should be **Ord Village...** 7

## **CHAPTER 2** EXISTING CONDITIONS AND ISSUES GEOLOGY AND SOILS

1. Page 2-3. Second bullet: “Imjun Parkway” should be Imjin Parkway.  
2. Page 2-3. Fourth bullet: “Fritzsche Field” should be referred to as either the former Fritzsche Army Airfield or by it’s current name, Marina Municipal Airport. 8

3. Page 2-3. Second paragraph: DoD has retained approximately 800 acres. Plus the figures stated in the text are outdated. 8

4. Page 2-5. The Monterey Bay Recreation Trail extends north of Sand City as well, through the Fort Ord Dunes area (adjacent to State Route 1) to the City of Marina. 9

5. Page 2-6. Figure 2-2 is located on this page but not referenced until page 2-17. The figure should be located closer to where it is referenced. 10

6. Page 2-9. **HYDROLOGY SURFACE WATER** states there are six storm water outfalls in the Fort Ord Dunes area, but only four outfalls are shown in Figure 1-2. 11

7. Page 2-11. **WATER QUALITY Groundwater** states “National Pollutant List” and should read National Priority List (NPL). 11

8. Page 2-17. **GEOLOGIC HAZARDS Soil Erosion Figure 2-4** is outdated. The existing conditions have changed since these photographs were taken. The extent of the soils erosion is greater. Erosion control measures are working at storm water outfalls 1 and 2. Soil stabilization 12

measures (e.g. reseeded, straw crimping) are in place atop the former Stilwell Hall site. Current pictures of those areas should be incorporated.

12  
cont.

9. Page 2-47. **ARCHIVAL RESULTS Figure 2-6** Former Stilwell Hall shows the building was removed in 2003. Building demolition and removal was actually completed in February 2004.

10. Page 2-59. **STORMWATER FACILITIES** states there are six storm water outfalls in the Fort Ord Dunes area, but only four outfalls are shown in Figure 1-2.

11. Page 2-62. First paragraph: “ml/kg” should be mg/kg.

12. Page 2-62. First paragraph: Figure 2-9 is not relevant to blood lead levels and should be referenced elsewhere.

13

13. Page 2-64. **Existing Army Structures** fifth line down, “army” should be Army.

14. Page 2-64. **Groundwater** The description of the groundwater remediation is incorrect. The groundwater extraction system was constructed in 1999. The volatile organic compounds of concern are chloroform; 1,2-Dichloroethane; 1,2-Dichloroethene; cis-1,2-Dichloroethene; tetrachloroethene; trichloroethene and vinyl chloride.

15. Page 2-82. Second paragraph: “Environmental Protection Agencies” should be Environmental Protection Agency’s.

### **CHAPTER 3 THE PLAN GENERAL PARKWIDE MGMT. GOALS & GUIDELINES**

1. Page 3-7. **LAND USE AND PARK RESOURCES Guidelines** LU-2 states “...avoiding placement of facilities in areas with potential hazardous materials contamination...” This guideline could be construed to mean the Army has not completed environmental remediation of contaminated areas within the proposed park site. The Army’s environmental remediation process in the former Fort Ord coastal zone is completed.

14

2. Page 3-22. The Primary Theme section regarding hazardous materials and other pollutants implies there are on-going problems. The section should be phrased in the past tense, particular for lead and coastal water quality, since mitigation measures have already been completed.

### **CHAPTER 4 ENVIRONMENTAL ANALYSIS**

1. Page 4-1. The proposed park is on land that is currently under federal ownership. Projects on federal property require NEPA analysis. As previously stated, recommend that your legal office consider the applicability of NEPA to this project.

15

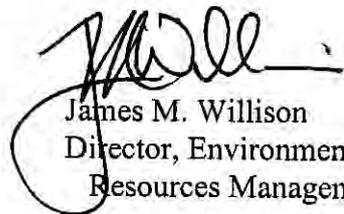
2. Page 4-2. **AREAS OF KNOWN CONTROVERSY**, the sixth bullet item states “Potential human health hazards associated with lead contamination...” The text should reference the Army’s risk assessment (and it’s conclusions) that was prepared for this site.

16

3. Page 4-41. The second bullet point regarding groundwater depletion is not relevant and could be deleted. As noted in the General Plan, the groundwater is not suitable for use due to seawater intrusion and the existing contamination plume. Additionally, the area of Fort Ord Dunes is within a Special Groundwater Protection Zone, as defined by Monterey County Ordinance 04011; therefore it is likely a land use covenant restricting access to groundwater will be required by DTSC and attached to the deed.

17

Thank you again for the opportunity to review and comment on the EIR. Please contact Mr. Robert Guidi at 831-242-7928 or e-mail [robert.guidi@monterey.army.mil](mailto:robert.guidi@monterey.army.mil) if you have questions regarding our comments.



James M. Willison  
Director, Environmental and Natural  
Resources Management

- F JAMES M. WILLISON, U.S. DEPARTMENT OF THE ARMY  
DEFENSE LANGUAGE INSTITUTE FOREIGN LANGUAGE  
CENTER AND PRESIDIO OF MONTEREY
- F-1 The Department of the Army notes that the General Plan/EIR is well organized and written. This comment is noted.
- F-2 The Department of the Army requests determination of the applicability of National Environmental Policy Act requirements. The Department of the Army has undertaken National Environmental Policy Act compliance for disposal and reuse of the former Fort Ord military reservation, and addressing property transfer. The General Plan/EIR have been prepared prior to transfer of Fort Ord Dunes to the State such that implementation of the General Plan may begin upon transfer (and upon receipt of General Plan funding), ensuring that this high demand recreation opportunity is made available to the public as soon as possible. Because National Environmental Policy Act compliance has addressed property transfer and no General Plan action (implementation) would occur prior to property transfer to the state, no further National Environmental Policy Act compliance is required.
- F-3 The Department of the Army requests update regarding existing conditions of Fort Ord Dunes. CEQA Guideline 15125 indicates that an EIR must include a description of the physical environmental conditions, as they exist at the time the notice of preparation is published. This allows a lead agency to evaluate impacts against a description of baseline physical conditions. The Fort Ord Dunes State Park General Plan notice of preparation was published in May of 2003. Since that time, a variety of activities have occurred and continue to occur at Fort Ord Dunes, including remediation and restoration activities, removal of Stilwell Hall and other existing facilities, removal and/or repair of stormwater outfalls, and construction of percolation basins. In addition, weather conditions have resulted in unpredicted changes to Fort Ord Dunes, such as increased erosion at stormwater piping following rainstorms. Many of these actions have resulted in changes to the landform and site conditions at Fort Ord Dunes on a monthly or even weekly basis. While not required by CEQA, the Department recognized that the changing conditions at Fort Ord Dunes occurring since publication of the notice of preparation could affect development and relevance of details of The Plan, as well as the accuracy of the program-level environmental analysis. Therefore, the Department updated portions of the existing conditions section of the General Plan/EIR prior to preparation of The Plan and the environmental analysis.

While additional changes to landform and site condition have occurred since that time, they do not affect the content or accuracy of The Plan or the environmental analysis and further modification of the existing conditions description to reflect additional land condition changes that have occurred since publication of the notice of preparation is warranted. Future area- and site-specific plans and any future General Plan update would include updated Fort Ord Dunes existing conditions descriptions.

- F-4 The Department of the Army comments on the status of their environmental remediation activities at Fort Ord Dunes. The description and status of Department of the Army lead is located on General Plan/EIR pages 2-62 through 2-64 and indicates that the required lead remediation activities were completed and that a human health risk assessment has been conducted. As noted, the human health risk assessment found that human health risks associated with metals in soils were considered unlikely for potential receptors such as park rangers, habitat management workers, construction workers, youth recreational visitors, and adult and child residents. The Department recognizes the importance and extent of lead remediation conducted by the U.S. Army. However, the Department understands that additional hazardous materials investigation and management may be required for use of Fort Ord Dunes as a state park to ensure that specific use types and locations are appropriate for site conditions. See also Comment B-2, provided by the California Department of Toxic Substances Control. Guideline HAZ-4 (General Plan/EIR page ES-1 and 3-43) reflects additional hazardous materials management strategies and monitoring guidelines that may be required for a state park and does not refer to any remediation procedures already completed by the U.S. Army. Guideline HAZ-2 reflects site-specific hazardous materials investigation, and is consistent with the U.S. Army request that site-specific hazards be referenced.

General Plan/EIR page 2-64 notes that shallow groundwater underlying the Fort Ord Dunes is no longer used for drinking water due to its high salinity, consistent with this comment. General Plan/EIR page 3-22, noted in this comment, includes a brief description of interpretive themes that may be implemented at Fort Ord Dunes State Park, including hazardous materials and pollutants. Development of this element would include a detailed description that reflects past use as well as current conditions at Fort Ord Dunes. The other General Plan pages referenced in this comment (2-1, 2-68) reflect the overall U.S. Army hazardous materials management and other management activities undertaken by the Army relevant to Fort Ord Dunes, while more detailed descriptions of U.S. Army remediation activities are found within the Hydrology, Geology and Soils,

and Hazardous Materials sections of Chapter 2, Existing Conditions and Issues.

- F-5 The Department of the Army comments that following property transfer, site specific hazardous materials would be conducted by the Department at the discretion of the California Department of Toxic Substances Control. This comment is noted.
- F-6 The Department of the Army suggests use of the Fort Ord website for review of additional information regarding basewide remediation. The Department utilized the suggested website several times throughout the planning process, and found the website to be very useful, along with contact with representatives of the Department of the Army. The Department would continue to use this website for development of area- and site-specific plans and for any future update of the General Plan.
- F-7 The Department of the Army notes typographical errors on General Plan/EIR page 1-2, Figure 1-2, and page 2-3. These errors were also noted by the Department; see Staff-initiated Text Changes in Chapter 3 of this document.
- F-8 The Department of the Army suggests updated information regarding former Fort Ord military reservation land uses. See the Department consideration of Comment F-3.
- F-9 The Department of the Army comments that the Monterey Bay Recreation Trail description on General Plan/EIR should note that the trail extends to the City of Marina. The trail area referenced is described on General Plan/EIR page 2-4, which notes that portions of the Monterey Bay Recreational Trail are located along the west side of State Route 1, within the California Department of Transportation right of way and adjacent to Fort Ord Dunes.
- F-10 The Department of the Army comments that Figure 2-2 is located on General Plan EIR page 2-6 but is not referenced until page 2-17. While Figure 2-2 is referenced on page 2-17, it is first referenced on page 2-5 in the Fort Ord Dunes topography description. Therefore, Figure 2-2 is properly placed on page 2-6.
- F-11 The Department of the Army comments on General Plan/EIR Figure 1-2 and notes a typographical error on page 2-11. These errors were also noted by the Department; see Staff-initiated Text Changes in Chapter 3 of this document.

- F-12 The Department of the Army requests update regarding existing conditions of Fort Ord Dunes. See the Department consideration of Comment F-3. In addition, while it is noted that the site conditions at locations shown in Figure 2-4 have changed, this figure demonstrates an ongoing management issue at Fort Ord Dunes and was deemed important to facilitation of development of The Plan.
- F-13 The Department of the Army comments on General Plan/EIR Figure 1-2 and text on pages 2-62, 2-64, and 2-82. These errors were also noted by the Department; see Staff-initiated Text Changes in Chapter 3 of this document.
- F-14 The Department of the Army comments that General Plan Guideline LU-2 could be construed to mean that the Army has not completed remediation of contaminated areas within Fort Ord Dunes and that interpretive themes described on 3-22 may imply ongoing problems. See the Department consideration of Comment F-4. Guideline LU-2 applies to all hazardous materials, including previously unidentified or subsurface contaminants.
- F-15 The Department of the Army requests determination of the applicability of National Environmental Policy Act requirements. See the Department consideration of Comment F-2.
- F-16 The Department of the Army requests the addition of detail to the General Plan/EIR listing of areas of known controversy (page 4-2). As described on General Plan/EIR page 4-3, the areas of known controversy evolved from main issues and concerns raised by the public and agencies during development of the general plan. Potential soil contamination and human health effects were raised several times by public commenters during the planning process and it noted that the Department described the U.S. Army's remediation process and conclusions at public meetings held during the planning process. The description of areas of known controversy does not attempt to resolve the issues raised or indicate where each issue is addressed. Detail regarding the Department of the Army's remediation efforts is described elsewhere in the General Plan/EIR, primarily in the Hazards and Hazardous Materials section of Chapter 2, Existing Conditions and Issues.
- F-17 The Department of the Army comments that groundwater depletion is not a relevant threshold for evaluation of water quality impacts due to existing groundwater conditions underlying Fort Ord Dunes. The list of thresholds for determining significant resource impacts was adapted from the CEQA Environmental Checklist. The Department determined that this checklist was appropriate for use as significance thresholds for evaluation of

potential impacts of projects conducted at state parks. While it is acknowledged that shallow groundwater underlying the Fort Ord Dunes is no longer used for drinking water due to its high salinity, evaluation of potential groundwater depletion addresses potential offsite impacts as well. For instance, a project that requires large amounts of water supply from a water district that relies on groundwater supplies could result in a potential groundwater depletion impact, even though the groundwater source is not beneath the proposed project area.

# CHAPTER 3

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## PRELIMINARY GENERAL PLAN AND DRAFT ENVIRONMENTAL IMPACT REPORT TEXT REVISIONS

### INTRODUCTION

The following corrections and/or clarifications have been made to the text of the Preliminary General Plan/Draft EIR text. These corrections include: minor corrections made by the authors to improve writing clarity, grammar, and consistency; corrections or clarifications requested by a specific response to comments; or staff-initiated text changes to update information presented in the Preliminary General Plan/Draft EIR. The text revisions are organized by the chapter and page number that appear in the Preliminary General Plan/Draft EIR. Text changes initiated by Department staff precede changes initiated by EIR commenters. ~~Deleted text~~ indicates text that has been deleted from the General Plan/EIR. Text that has been added is presented as single underlined.

### DEPARTMENT STAFF-INITIATED TEXT REVISIONS

#### ***EXECUTIVE SUMMARY***

As a staff-initiated text change, page ES-1, paragraph 2 has been revised as follows:

The 990 acre Fort Ord Dunes State Park unit is a new park unit that will provide a unique opportunity to preserve and make available for public use, inspiration, aesthetic enjoyment, and education, an area along the Monterey Bay shoreline of unique natural beauty and scientific significance including sandy beaches, coastal dunes, and remnants of the site's military history. Given the history of use of Fort Ord Dunes as a portion of the former Fort Ord military reservation, the landscape is altered from its natural state, but also includes an expansive seascape and a landform of dune habitat and an undeveloped seashore.

As a staff-initiated text change, page ES-3, paragraph 1 has been revised as follows:

Some of the key goals and guidelines of the plan, particularly those recommending specific management plans and programs (see items called out in **bold text**), are listed on Table ES-1.

As staff-initiated text changes and in response to Comments 4-3, 6-3, 9-3, 9-5, and 10-5, Table ES-1, pages ES-4 through ES-7, has been revised (see following pages).

As a staff-initiated text change, page ES-9, Table ES-2 has been revised (see following pages).

As a staff-initiated text change, page ES-11, paragraph 6 has been added as follows:

The CEQA Guidelines (Title 14, California Code of Regulations), Article 9, Contents of Environmental Impact Reports, Section 15120(c) states that Draft Environmental Impact Reports shall contain the information required by Sections 15122 through 15131. The following table shows where the required items are found in this General Plan and Environmental Impact Report.

As a staff-initiated text change, page ES-13 has been added (see following pages).

## **CHAPTER 1, INTRODUCTION**

As a staff-initiated text change, page 1-1, paragraph 4 has been revised as follows:

### **PURPOSE ACQUIRED**

The area that comprises Fort Ord Dunes, as well as significant acreage to the east, was originally established as a military post by the War Department in 1917. For the next 75 years, Fort Ord served the United States Army for training and other functions until it was designated for closure in 1991. The Department applied to the National Park Service for the conveyance of the coastal Fort Ord

TABLE ES-1  
SUMMARY OF KEY GOALS AND GUIDELINES

| Goals   | Guidelines  |
|---|---|
| <b>Geology and Soils</b>  |   |
| Identify potential management actions to minimize potential damage to park resources from erosion, seismic activity, or other potential adverse impacts associated with the park's geologic setting.  | GEO-1 Exclude construction of new facilities and permanent structures in areas expected to be subject to coastal erosion within 100 years of construction (a maximum of approximately 700 feet).  |
| <b>Biotic Resources</b>   |   |
| Preserve, maintain, restore, and interpret the dunes special-status species and communities.  | BIO-2 To the extent feasible, site active recreation uses and facilities beyond the limits of direct and indirect effects for known existing special-status plant populations, and known existing special-status wildlife habitat. Limit public use of dune habitat areas to designated trails and public use areas.  |
| Continue native dune restoration and non-native plant control to reach the ultimate goal of maintaining a minimum of 700 acres of existing and restored habitat, as set forth in the base-wide Habitat Management Plan (HMP) and the Draft Habitat Conservation Plan (HCP). | BIO-3 <del>4</del> Establish a <b>Western Snowy Plover Management Program</b> to monitor and protect nesting areas and activities, and to establish appropriate levels of public access to these areas. When determined necessary, implement appropriate supplemental measures, such as erection of enclosures, and predator control, in accordance with the Department's "Western Snowy Plover Systemwide Management Guidelines," and as necessary through consultation with regulatory agencies and local experts, <u>including the U.S. Fish and Wildlife Service.</u> |
|   | BIO-5 Review all area- and site-specific planning for consistency with the base-wide HMP and Draft HCP.   |
|   | BIO-6 Identify and maintain a minimum of 700 acres of park property that will be designated for habitat preservation and restoration, <u>including all areas of management zones that are not proposed for development during site-specific planning.</u> Restore natural landforms and native plant communities within this area. Restore plant communities to the conditions that prevailed in the area prior to Euro-American influences, to the maximum extent practical.   |
|   | BIO-7 Prepare a long-term <b>Vegetation Management Plan</b> that addresses restoring native dune habitats. <u>Coordinate development of the program with the U.S. Fish and Wildlife Service and other agencies, as appropriate.</u>   |

**TABLE ES-1 (Continued)  
SUMMARY OF KEY GOALS AND GUIDELINES**

| Goals   | Guidelines   |
|---|--|
| <b>Aesthetic Resources</b>  |  |
| Identify, preserve, and perpetuate the distinctive landscape qualities of the dunes.  | <p>AES-1 Limit the placement of park facilities and uses from which State Route (SR) 1 would be visible to those uses that are not dependent on high quality aesthetic resources, such as vehicular travel, entrance stations, and paved trail use.</p>  |
|   | <p>AES-2 Develop unobtrusive park facilities to enhance and create public opportunities for viewing existing panoramic views from the dunes.</p>   |
| Ensure manmade facilities complement and do not detract from the park's natural setting.  | <p>AES-4 Visually integrate park facilities into the environment through the use of siting techniques, building forms, scale, materials, and colors. Work with adjoining jurisdictions regarding land use and development within the Fort Ord Dunes viewshed that may affect the park and its scenic resources.</p>  |
|   | <p>AES-5 Create architectural design guidelines that place a strong emphasis on the overall park vision, and that direct consistent implementation of design principles in all aspects of park management and development. Integrate guidelines into the design and siting of park components, buildings, and facilities to reflect the overall vision of the park.</p>  |
| <b>Recreation</b>   |  |
| Provide, plan, and manage a variety of recreational opportunities that will allow California's diverse population to visit, enjoy, and better understand the significance of the dunes, while maintaining the highest levels of resource management and protection. | <p>REC-1 Develop recreational uses that consider both user needs and resource protection requirements and are compatible with other visitor experiences. Where feasible, develop facilities and recreational and operational use areas that are already developed, disturbed, or of low resource value.</p> <p>REC-2 Develop and operate recreational facilities to enable the public to see, enjoy, and understand the primary resources of the park.</p> |

**TABLE ES-1 (Continued)  
SUMMARY OF KEY GOALS AND GUIDELINES**

| Goals   | Guidelines  |
|---|---|
| <b>Circulation</b>  |   |
| Establish a circulation system that establishes clear traffic patterns, conveys the park image, and minimizes traffic impacts.  | <p>CIR-1 Consider <u>the transportation and circulation goals, guidelines, and traffic levels of service of the Fort Ord Reuse Authority (and applicable former Fort Ord military reservation land users), Marina, Seaside, Monterey County, Transportation Agency for Monterey County, and Caltrans, Association of Monterey Bay Governments, California Coastal Commission, Coastal Conservancy, and other applicable agencies. <del>transportation and circulation goals, guidelines, and traffic levels of service</del> with respect to potential park entrances and travel corridors approaching entrances. Develop a <b>Circulation and Access Management Plan</b> to assess circulation, access (including beach access), and parking demands, in coordination with the plans of other agencies.</u></p>  |
| Balance the need for parking with visitor experience, aesthetics, and protection of park's natural and cultural resources.  | <p>CIR-9 Balance parking needs with alternate forms of transportation to accommodate public access to the park and serve park uses and facilities.</p>  |
| Provide a system of trails that link all management zones of the park into an integrated whole and encourage development of trail connections to other nearby parks and open space providers. | <p>CIR-12 Develop a <b>Unit Trails Plan</b> that would create opportunities for visitors to enjoy the unique and diverse topography, geology, biotic communities, and scenic values of the park. The actual location, distance, and use of future trails would be governed by this plan. Include specifications and policies concerning trail construction and maintenance, coordinated with soil erosion and sedimentation control measures. <u>Incorporate design requirements from the Federal Architectural and Transportation Board Guidelines for Outdoor Developed Areas for public pedestrian access. Coordinate development of the Unit Trails Plan with applicable agencies, including but not limited to the Association of Monterey Bay Area Governments, the California Coastal Commission, the Coastal Conservancy, and the Transportation Agency for Monterey County's Bicycle and Pedestrian Facilities Advisory Committee.</u></p> |

**TABLE ES-1 (Continued)  
SUMMARY OF KEY GOALS AND GUIDELINES**

| Goals   | Guidelines  |
|---|---|
| <b><i>Circulation (continued)</i></b>   |   |
| Provide a system of trails that link all management zones of the park into an integrated whole and encourage development of trail connections to other nearby parks and open space providers (continued). | CIR-13 Develop trails that provide for public access within the park and to adjacent regional trail systems, with priority for achieving unitwide resource management goals and objectives. Support regional trail objectives, coordinate with other land management agencies in the vicinity to evaluate and monitor resource conditions and share information to develop open space management programs and multiple use trail plans on a regional scale. Recognize the Monterey Bay Coastal Trail and California Coastal Trail as an important non-vehicular transportation corridor and an important means of unifying public use areas within the non-contiguous portions of Monterey Bay. |
| <b><i>Public Safety and Law Enforcement</i></b>   |   |
| <u>Anticipate wildfires, plan strategies to preserve sensitive park resources, ensure human safety, and protect property</u>  | <u>PUB-10 Coordinate with appropriate fire suppression agencies, such as the California Department of Forestry and Fire Protection and county and volunteer fire departments, to maintain a <b>Fire Management Plan</b> for the park. Include in the plan all aspects of wildfire planning, including prevention, pre-suppression, and suppression. Identify modified fire suppression methods and ways to protect sensitive park resources in the plan.</u>  |
| <b><i>Hazards and Hazardous Materials</i></b>   |   |
| Protect park visitors and staff from potential hazardous conditions, and park staff, visitors, and the environment from adverse impacts associated with hazardous materials.                              | HAZ-1 Work closely with the Army, the California Department of Toxic Substances Control, and other responsible regulatory agencies to develop procedures that would assure that all contaminated sites within the Park are remediated and managed to appropriate State and Federal standards. Adopt measures to assure public and employee safety will be undertaken.   |
|   | HAZ-2 Perform a site-specific review of soil data, as deemed appropriate, for proposed recreation uses and facilities to be located within identified lead-impacted areas prior to area- or site- specific development, and assure appropriate protection of people and the environment from potential impacts associated with handling and disposal of lead-impacted soils.  |

**TABLE ES-1 (Continued)  
SUMMARY OF KEY GOALS AND GUIDELINES**

| Goals   | Guidelines   |
|---|--|
| <b>Regional Planning</b>  |  |
| Continue coordination with local land use agencies regarding transfer and/or acquisition of additional nearby property, or other cooperative land management efforts. | <p>REG-1 Evaluate regional land use planning and encourage multi-agency planning, coordination with local cities, Monterey County, universities, youth hostels, and other land managers for locating park administration, operations, employee housing, and maintenance facilities, overnight lodging, an entrance station, or a visitor center on non-park lands nearby, particularly in previously developed and disturbed areas of the former Fort Ord military reservation located east of SR 1.</p> |
|   | <p>REG-2 Consider existing and future Fort Ord Reuse Authority, Seaside, Marina, Monterey County, Transportation Agency for Monterey County, and other agency plans and proposed land uses within, adjacent to, and near Fort Ord Dunes as related to compatibility and capacity of potential Fort Ord Dunes uses. Planning and development should be carefully coordinated with other agencies to assure that all concerns are addressed, avoiding cumulative impacts to the extent feasible.</p>       |

**TABLE ES-2  
SUMMARY OF MANAGEMENT ZONE USES AND FACILITIES**

|                                 | <b>Natural Resource Management Zone</b>  | <b>8th Street Management Zone</b>  | <b>1st Street Management Zone</b>   | <b>Storage Bunker Zone</b>   | <b>Park Support Administrative Zone</b>   |
|---------------------------------|--|--|---|--|---|
| Visitor and Administrative Uses | <ul style="list-style-type: none"> <li>No motorized use by visitors (except to comply with Americans with Disabilities Act requirements); low impact walking/trail use through natural resources</li> <li>Beach use, nature study and observation, interpretation sightseeing</li> <li>Emergency/operational vehicle access</li> </ul> | <ul style="list-style-type: none"> <li>Walking/trail use, nature study and observation, sightseeing, pedestrian beach access, picnicking, interpretation, visitor arrival and orientation</li> <li>Emergency/operational vehicle access</li> </ul>   | <ul style="list-style-type: none"> <li>Interpretation with walking/trail access and vehicular access, visitor arrival and orientation</li> <li>Emergency/operational vehicle access</li> </ul>  | <ul style="list-style-type: none"> <li>Camping, day use parking, pedestrian beach access, and interpretation</li> <li>Emergency/operational vehicle access, park operations, adaptive reuse of bunkers for storage</li> </ul>  | <ul style="list-style-type: none"> <li>This zone will provide park administration and maintenance uses</li> <li>East of SR 1 only, this zone will also provide additional uses such as orientation and interpretation and indoor overnight uses</li> <li>Emergency/operational vehicle access</li> </ul>  |
| Possible Facilities             | <ul style="list-style-type: none"> <li>Limited new multi-use stabilized and/or paved trails, unpaved trails, boardwalks, vista points, outdoor exhibit stations/kiosks</li> <li>Existing and new Emergency/operational vehicle routes</li> </ul>   | <ul style="list-style-type: none"> <li>New Entrance station, visitor center/kiosk</li> <li>New vista point, paved and unpaved trails, outdoor exhibit stations, restroom/utilities infrastructure</li> <li>Existing parking (up to approximately 90 to 100 day use parking spaces may be appropriate within this zone)</li> <li>New and existing Emergency/operational vehicle routes</li> </ul> | <ul style="list-style-type: none"> <li>New entrance station, visitor center/kiosk</li> <li>New paved and unpaved trails</li> <li>Interpretation of existing former firing range and military era structures with outdoor exhibit stations</li> <li>New vista point, limited short-term parking (up to approximately 15 to 20 parking spaces may be appropriate within this zone), restroom/utilities infrastructure</li> <li>New and existing emergency/operational vehicle routes</li> </ul> | <ul style="list-style-type: none"> <li>New family and group campgrounds (up to approximately 50 to 110 campsites may be appropriate within this zone), paved and unpaved trails, boardwalks, new and existing day-use parking (up to approximately 40 to 80 day use parking spaces may be appropriate within this zone), and outdoor exhibit stations</li> <li>Adaptive reuse of existing bunkers and existing buildings</li> <li>New restrooms/utilities infrastructure</li> <li>New and existing emergency/operational vehicle routes</li> </ul> | <ul style="list-style-type: none"> <li>New administrative facilities, maintenance/operations yard, employee housing</li> <li>East of SR 1 only – new park or multi-agency visitor center, youth hostel, and visitor parking (up to approximately 40 to 80 visitor serving parking spaces may be appropriate within this zone)</li> <li>New and existing emergency/operational vehicle routes</li> </ul> |

**TABLE ES-3**  
**LOCATION OF CEQA EIR REQUIRED CONTENT WITHIN THIS DOCUMENT**

| <u>CEQA Guidelines Content</u>   | <u>Location within Fort Ord Dunes State Park General Plan and EIR</u>   |
|--|---|
| 15122 <u>Table of Contents or Index</u>  | <u>The Table of Contents is located at the beginning of this document, following title pages and the Notice of Availability</u>   |
| 15123 <u>Summary</u>   | <u>The EIR Summary is located on pages 4-1 through 4-8</u>  |
| 15124 <u>Project Description</u>   | <u>Chapter 3, The Plan describes the Project and Pages 4-8 through 4-9, Project Description, summarize the plan. Chapter 1, Introduction included information about the project objective and the general plan process.</u> |
| 15125 <u>Environmental Setting</u>   | <u>Chapter 2, Existing Conditions and Uses</u>  |
| 15126.2 <u>Consideration and Discussion of Environmental Impacts, Consideration and Discussion of Significant Environmental Impacts</u>      | <u>Chapter 4, Environmental Analysis</u>  |
| (a) <u>Significant Environmental Effects of the Proposed Action</u>  | <u>Significant Environmental Effects and Mitigation, pages 4-9 through 4-57</u>   |
| (b) <u>Significant Environmental Effects Which Cannot be Avoided if the Proposed Project is Implemented</u>                                  | <u>Unavoidable Significant Environmental Effects, page 4-57</u>   |
| (c) <u>Significant Irreversible Environmental Changes Which Would be Involved in the Proposed Project Should it be Implemented</u>           | <u>Significant Irreversible Environmental Changes, pages 4-57 through 4-58</u>  |
| (d) <u>Growth-Inducing Impact of the Proposed Project</u>  | <u>Growth-inducing Impacts, page 4-58</u>   |
| 15126.4 <u>Consideration and Discussion of Mitigation Measures to Minimize Significant Effects</u>   | <u>Significant Environmental Effects and Mitigation, pages 4-9 through 4-57</u>   |
| 15126.6 <u>Consideration and Discussion of Alternatives to the Proposed Project</u>  | <u>Alternatives to the Proposed Action, pages 4-59 through 4-64</u>   |
| 15127 <u>Limitations on Discussion of Environmental Impact (excludes requirement for compliance with 15126.2(c) under some circumstances</u> | <u>Not applicable, there are no limitations on discussion of irreversible changes because the proposed action includes enactment of a plan of a public agency</u>   |
| 15128 <u>Effects Not Found to Be Significant</u>   | <u>Effects Found Not To Be Significant, pages 4-66 through 4-74</u>   |
| 15129 <u>Organizations and Persons Consulted</u>   | <u>Appendix B, Literature and Sources Consulted and Appendix C, Public and Agency Consultation</u>  |
| 15130 <u>Discussion of Cumulative Impacts</u>  | <u>Cumulative Impacts, pages 4-64 through 4-66</u>  |
| 15131 <u>Economic and Social Effects</u>   | <u>This optional topic is addressed in Chapter 3</u>  |

As a staff-initiated text change, page 1-3, Figure 1-2 has been revised (see following page).

## **CHAPTER 2, EXISTING CONDITIONS AND ISSUES**

As a staff-initiated text change, page 2-3, bullet 2 has been revised as follows:

- The Main Garrison Area, which is the main developed portion of the former Fort Ord military reservation and is directly accessed from two freeway ramps along SR 1: Lightfighter Drive and 12th Street/Imjiiun Parkway

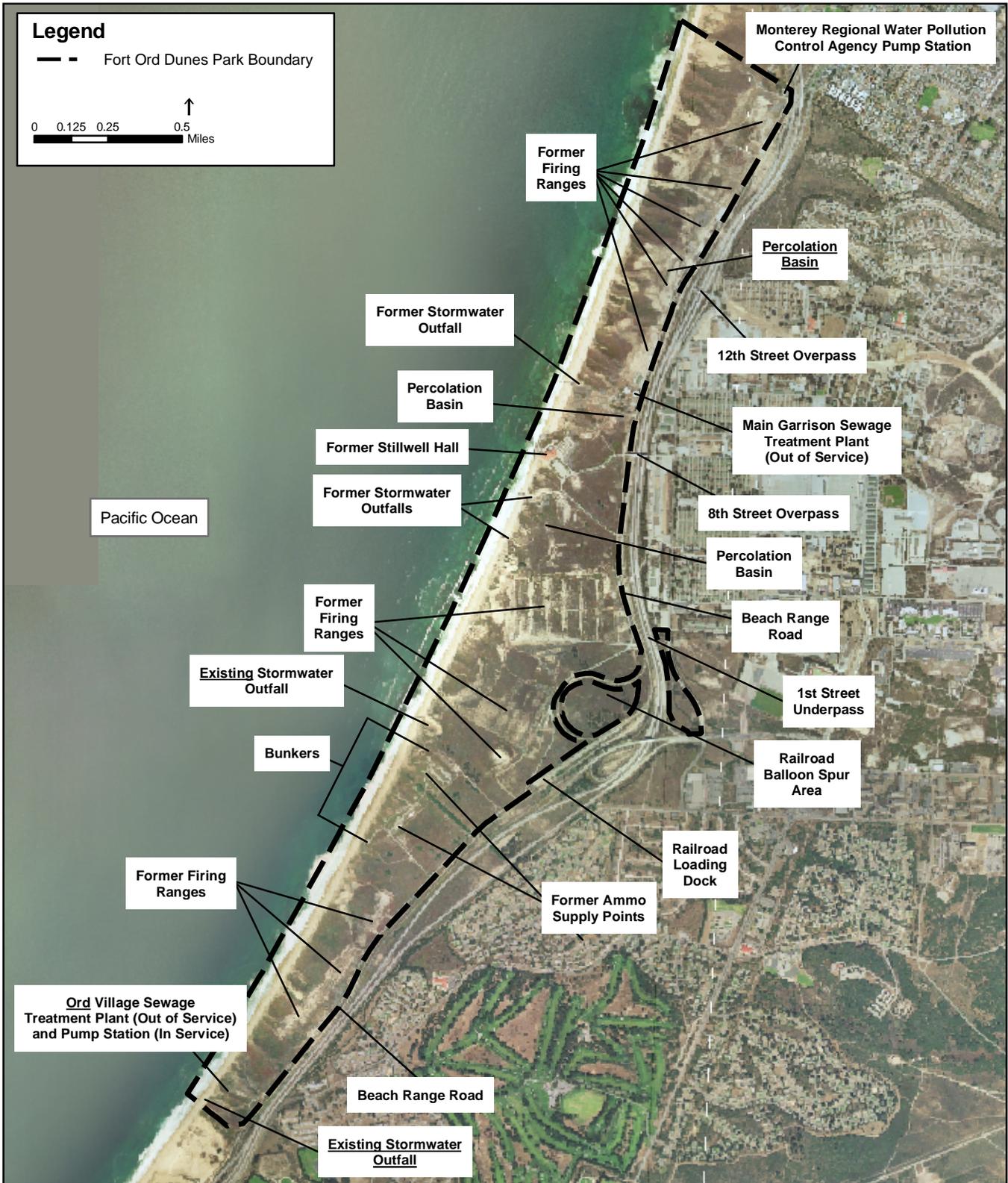
As a staff-initiated text change, page 2-11, paragraph 1 has been revised as follows:

### **Groundwater**

The former Fort Ord military reservation was placed on the National Priority ~~Pollutant~~ List Superfund list in 1990 primarily due to the extent of groundwater contamination resulting from Army operations. Although the majority of groundwater impacted areas are outside Fort Ord Dunes, a portion of Fort Ord Dunes is underlain by impacted groundwater (see Hazards and Hazardous Materials, below). A groundwater treatment system was constructed to remediate volatile organic compounds concentrations and began operation in 1994; it is anticipated that the system will operate for 30 years in order to reach water quality cleanup objectives (USACOE, 2002).

As a staff-initiated text change, page 2-61, paragraph 5 has been revised as follows:

Preliminary investigations into potential soil or groundwater impacts resulting from Army operations began in 1984. The former Fort Ord military reservation was placed on the National Priority List for designation as a federal Superfund Site primarily due to the discovered extent of groundwater contamination in 1990. Following selection for base closure in 1991, troops were moved from the base in 1993, and the Fort Ord Army Base officially ceased operations in 1994. Following base closure, the Army has focused on remediation of soil and groundwater in anticipation of future real estate dispersal. The Army, California Department of Toxic Substances Control, and the Department are preparing management and monitoring guidelines for on-site residual contaminants within Fort Ord Dunes. Following property transfer, the Army will continue to be responsible for management of hazardous materials resulting from Army operations, including any potential contaminants that were previously undiscovered.



Fort Ord Dunes State Park

SOURCE: C DPR, 2003a; ESA, 2003; USACOE, 1993

**Figure 1-2**  
Project Site and Existing Facilities

As a staff-initiated text change, page 2-61, paragraph 5 has been revised as follows:

Preliminary investigations into potential soil or groundwater impacts resulting from Army operations began in 1984. The former Fort Ord military reservation was placed on the National Priority List for designation as a federal Superfund Site primarily due to the discovered extent of groundwater contamination in 1990. Following selection for base closure in 1991, troops were moved from the base in 1993, and the Fort Ord Army Base officially ceased operations in 1994. Following base closure, the Army has focused on remediation of soil and groundwater in anticipation of future real estate dispersal. The Army, California Department of Toxic Substances Control, and the Department are preparing management and monitoring guidelines for on-site residual contaminants within Fort Ord Dunes. Following property transfer, the Army will continue to be responsible for management of hazardous materials resulting from Army operations, including any potential contaminants that were previously undiscovered.

As a staff-initiated text change, page 2-62, paragraph 1 has been revised as follows:

***Soil Conditions***

Decades of use as a firing range resulted in spent ammunition and elevated levels of heavy metals (particularly lead) in soil throughout Fort Ord Dunes. Remediation undertaken in 1997 and 1998 included excavation of approximately 162,800 cubic yards of soil and vegetation in areas with over 10% percent area coverage of spent ammunition or soil containing more than 1,860 milligrams per kilogram (mg/kg) lead concentrations (see Figure 2-9), which is the health-based clean up level established for Fort Ord lead remedial activities based upon expected exposure of park rangers, nearby residents, and visitors to lead-impacted soils. At this level, blood-lead levels are not expected to exceed 10 micrograms per deciliter (~~see Figure 2-9~~). Approximately 719,000 pounds of spent ammunition was recovered during remediation activities by separating bullets from excavated soil. The excavated lead-impacted soil was disposed at the Fort Ord OU2 Landfill located east of SR 1 (USACOE, 2002).

As a staff-initiated text change, page 2-64, paragraph 2 has been revised as follows:

***Existing Army Structures***

Although many buildings were removed from Fort Ord Dunes, structures originally constructed by the Army still remain. These structures include the wastewater treatment plant, and other smaller buildings associated with firing range training operations, as shown on Figure 1-2. A survey to determine the potential presence of asbestos within former Army buildings indicated that asbestos is present in many of these structures. Asbestos is a fibrous material used as a fireproofing and insulating agent in building construction before such uses were banned by the Environmental Protection Agency in the 1970s. Due to the age of these structures, it is assumed that buildings within Fort Ord Dunes also contain lead-based paint. Lead-based paint was commonly applied on interior and exterior structural surfaces prior to being banned by the Environmental Protection Agency in 1978. Detailed assessment of the potential presence of lead-based paint has not been conducted at Fort Ord Dunes.

As a staff-initiated text change, page 2-64, paragraph 5 (continued to page 2-65) has been revised as follows:

Shallow groundwater within the Salinas groundwater basin underlying Fort Ord Dunes has been impacted by former Army operations. Specifically, concentrations of dissolved volatile organic compounds, including ~~tetrachloride, 1,2-dichloroethane, dichloroethene, and tetrachloroethene~~ are present in the Salinas groundwater basin 180-foot aquifer. A plume of contaminated groundwater underlies a portion of Fort Ord Dunes in the vicinity of the wastewater treatment plant site. A groundwater collection, treatment, and reinjection system was constructed in 1999 to remediate volatile organic compounds concentrations; ~~it began operation in 1994~~. The system consists of groundwater extraction and treatment components, in addition to groundwater re-injection components which return pumped, treated groundwater to the aquifer. The system presently includes eight groundwater extraction wells, an aqueous phase carbon adsorption treatment unit consisting of two 10,000-pound carbon vessels located east of SR 1, and five recharge structures (two re-injection wells and three infiltration galleries). Groundwater extraction wells associated with this system are located within Fort Ord Dunes. Treatment of volatile organic compounds-impacted groundwater underlying Fort Ord Dunes is anticipated to be in operation for 30 years in order to reach water quality cleanup objectives (USACOE, 2002).

As a staff-initiated text change, page 2-82 paragraph 2 has been revised as follows:

The Environmental Protection Agency's ~~ies~~ California-modified preliminary remediation goal for lead in residential soils is 150 milligrams per kilogram, which serves as a guideline for clean-up standards, but is not a required standard. The California-modified goal is lower than the general residential preliminary remediation goal for Environmental Protection Agency Region 9 of 400 mg/kg, and was developed using California Environmental Protection Agency toxicity standards.

### **CHAPTER 3, THE PLAN**

As a staff-initiated text change, page 3-10, paragraph 6 has been revised as follows:

GEO-1 Exclude construction of new facilities and permanent structures in areas expected to be subject to coastal erosion within 100 years of construction (a maximum of approximately 700 feet), ~~based on California Coastal Commission recommendation (California Coastal Commission, 1996).~~ Exceptions may be allowed for roads, trails, and other facilities that may be considered expendable. Existing facilities may remain in use subject to periodic health and safety inspections.

As a staff-initiated text change, page 3-15, paragraph 4 has been revised as follows:

BIO-6 Identify and maintain a minimum of 700 acres of park property that will be designated for habitat preservation and restoration, including all areas of management zones that are not proposed for development during site specific planning. Restore natural landforms and native plant communities within this area. Restore plant communities to the conditions that prevailed in the area prior to Euro-American influences, to the maximum extent practical.

As a staff-initiated text change, page 3-29, paragraph 3 has been revised as follows:

AES-2 Develop unobtrusive park facilities to enhance and create public opportunities for viewing existing panoramic views from the dunes.

As a staff-initiated text change and in response to Comment 6-3, page 3-35, paragraph 4 has been revised as follows:

- CIR-1 Consider the transportation and circulation goals, guidelines, and traffic levels of service of the Fort Ord Reuse Authority (and applicable former Fort Ord military reservation land users), Marina, Seaside, Monterey County, Transportation Agency for Monterey County, and Caltrans, Association of Monterey Bay Governments, California Coastal Commission, Coastal Conservancy, and other applicable agencies, transportation and circulation goals, guidelines, and traffic levels of service with respect to potential park entrances and travel corridors approaching entrances. Develop a **Circulation and Access Management Plan** to assess circulation, access (including beach access), and parking demands, in coordination with the plans of other agencies.

As a staff-initiated text change and in response to Comments 6-3 and 9-3, page 3-38, paragraph 1 has been revised as follows:

- CIR-12 Develop a **Unit Trails Plan** that would create opportunities for visitors to enjoy the unique and diverse topography, geology, biotic communities, and scenic values of the park. The actual location, distance, and use of future trails would be governed by this plan. Include specifications and policies concerning trail construction and maintenance, coordinated with soil erosion and sedimentation control measures. Incorporate design requirements from the Federal Architectural and Transportation Board Guidelines for Outdoor Developed Areas for public pedestrian access. Coordinate development of the Unit Trails Plan with applicable agencies, including but not limited to the Association of Monterey Bay Area Governments, the California Coastal Commission, the Coastal Conservancy, and the Transportation Agency for Monterey County's Bicycle and Pedestrian Facilities Advisory Committee.

As a staff-initiated text change, page 3-38, paragraph 6 has been revised as follows:

- CIR-17 To the extent feasible, provide trail information signage and trail access information. Access information should be located at each designated trailhead and trail junction (per Department standards)-as appropriate.

As a staff-initiated text change, page 3-42, paragraph 6 has been revised as follows:

- PUB-10 Coordinate with appropriate fire suppression agencies, such as the California Department of Forestry and Fire Protection and county and volunteer fire departments, to maintain a **Fire Management Plan** for the park. Include in the plan ~~should~~ all aspects of wildfire planning, including prevention, pre-suppression, and suppression. Identify modified fire suppression methods and ways to protect sensitive park resources in the plan.

As a staff-initiated text change, page 3-53, paragraph 3 has been revised as follows:

- 8S-1 Consider providing day-use visitor facilities within the 8th Street Zone, which could include an entrance station, visitor center, trailheads, picnic sites, interpretive sites, restroom, scenic vista, parking (up to approximately 90 to 100 day use parking spaces may be appropriate within this zone), and a pedestrian beach access route.

As a staff-initiated text change, page 3-54, Table 3-2, line 5 has been revised as follows:

|                     |   |
|---------------------|---|
| Possible Facilities | <ul style="list-style-type: none"> <li>▪ Entrance station, visitor center/kiosk</li> <li>▪ Vista point, paved and unpaved trails, day use parking (<u>up to</u> approximately 90 to 100 day use parking spaces may be appropriate within this zone), outdoor exhibit stations, restroom/utilities infrastructure</li> <li>▪ Emergency/operational vehicle routes</li> </ul> |
|---------------------|---|

As a staff-initiated text change, page 3-55, paragraph 6 has been revised as follows:

This zone will provide a drivable park experience through the 1st Street and adjacent 8th Street and Storage Bunker Zones. Limited short-term visitor parking will be developed to serve access to interpretive facilities and a vista point providing views of Monterey Bay. It is anticipated that a range of up to approximately 10 to 15 total parking spaces may be appropriate to serve the interpretive facilities and a range of approximately 4 to 6 parking spaces may be appropriate

As a staff-initiated text change, page 3-56, Table 3-3, line 5 has been revised as follows:

|                     |  |
|---------------------|--|
| Possible Facilities | <ul style="list-style-type: none"> <li>▪ Entrance station, visitor center/kiosk</li> <li>▪ Paved and unpaved trails; interpretation of former firing range and military era structures with outdoor exhibit stations, vista point, limited short-term parking (<u>up to</u> approximately 15 to 20 parking spaces may be appropriate within this zone), restroom/utilities infrastructure</li> <li>▪ Emergency/operational vehicle routes</li> </ul> |
|---------------------|--|

As a staff-initiated text change, page 3-57, paragraph 2 has been revised as follows:

- 1S-1 Consider providing day-use visitor facilities within the 1st Street zone, which could include an entrance station, trailheads, interpretive sites, restroom, scenic vista, and short-term parking (up to approximately 15 to 20 parking spaces may be appropriate within this zone).

As a staff-initiated text change, page 3-57, paragraph 6 has been revised as follows:

***Management Intent***

This zone is comprised of the former ammunition storage bunkers, firing ranges, access roads, and adjacent areas (see Figure 3-1 and Table 3-4). Areas within this zone represent the most accessible, yet secluded area of the unit— especially along a grove of cypress, that, although not a species native to Fort Ord Dunes, provides wind shelter, shade, and evokes a visual association to the Monterey Peninsula as a whole. The land form and existing facilities further provides wind protection and shelter. In addition, this area includes scenic view opportunities and potential beach access. Existing development in this zone minimizes the potential for habitat disturbance related to development of park facilities and use. Consequently, this area is ideally suited for camping. It is anticipated that group and family campsites could be accommodated within this zone, with a potential range of up to approximately 50 to 110 campsites within the cypress area. The bunker zone also includes areas that would be appropriate for pedestrian beach access and day use parking, limited to specific areas.

As a staff-initiated text change, page 3-58, Table 3-4, line 4 has been revised as follows:

|  |   |
|--|---|
| Possible Visitor and Administrative Uses | <ul style="list-style-type: none"> <li>▪ Camping, day use parking, pedestrian beach access, and interpretation</li> <li>▪ Emergency/operational vehicle access (<del>i.e., maintenance equipment, park supplies, collections/artifacts, interpretive materials</del>), park operations, adaptive reuse of bunkers for storage (<del>i.e., maintenance equipment, park supplies, collections/artifacts, interpretive materials</del>)</li> </ul> |
|--|---|

As a staff-initiated text change, page 3-58, Table 3-4, line 5 has been revised as follows:

|                     |   |
|---------------------|---|
| Possible Facilities | <ul style="list-style-type: none"> <li>▪ Family and group campgrounds (<u>up to</u> approximately 50 to 110 campsites may be appropriate within this zone), paved and unpaved trails, boardwalks, day-use parking (<u>up to</u> approximately 40 to 80 day use parking spaces may be appropriate within this zone), and outdoor exhibit stations</li> <li>▪ Adaptive reuse of bunkers and existing buildings, restrooms/utilities infrastructure, emergency/operational vehicle routes</li> </ul> |
|---------------------|---|

As a staff-initiated text change, page 3-59, paragraph 3 has been revised as follows:

- SB-1 Consider providing day-use and overnight visitor facilities within the Storage Bunker Zone, which could include family or group campsites (up to approximately 50 to 110 campsites may be appropriate within this zone), trailheads, picnic sites, interpretive sites, restroom, parking (up to approximately 40 to 80 day use parking spaces may be appropriate within this zone), and pedestrian beach access route(s).

As a staff-initiated text change, page 3-60, paragraph 4 has been revised as follows:

- PSA-1 Consider providing park administration and support functions, such as administrative facility, maintenance/operations yard, and employee housing as appropriate. East of SR 1 consider providing a park or regional multi-agency visitor center, youth hostel, and associated parking (up to approximately 40 to 80 visitor serving parking spaces may be appropriate in this zone).

As a staff-initiated text change, page 3-61, Table 3-5, line 5 has been revised as follows:

|                     |   |
|---------------------|---|
| Possible Facilities | <ul style="list-style-type: none"> <li>▪ Administrative facilities, maintenance/operations yard, employee housing</li> <li>▪ East of SR 1 only – park or multi-agency visitor center, youth hostel, visitor parking (<u>up to</u> approximately 40 to 80 visitor serving parking spaces may be appropriate within this zone)</li> <li>▪ Emergency/operational vehicle routes</li> </ul> |
|---------------------|---|

**CHAPTER 4, ENVIRONMENTAL ANALYSIS**

As a staff-initiated text change, page 4-4, paragraph 2 has been revised as follows:

**AGRICULTURE RESOURCES**

Fort Ord Dunes is not zoned~~s~~ as farmland and no impact would occur.

As a staff-initiated text change and in response to Comment 10-10, page 4-25, paragraph 5 has been revised as follows:

**Impact Bio-2. Potential Construction Phase Effects on Special-status Species**

Implementation of the proposed General Plan could allow new land uses, new facilities and improvements to existing facilities, and could result in effects on special-status species, including Smith’s Blue butterfly, globose dune beetle, black legless lizard, special-status bats and birds, Western snowy plover and several special-status plant species. The 8th Street and 1st Street Zones contain medium density and low density Monterey spineflower populations, respectively. Localized, minor, short-term to long-term effects on special-status species could occur from construction of potential facilities and/or actions. Effects would be related to night lighting during operations, trampling, dust, heavy equipment, and construction activities and could result in direct removal of habitat, harassment or mortality, and introduction and spread of non-native species.

## **APPENDIX B, LITERATURE AND SOURCES CONSULTED**

As a staff-initiated text change, the following has been deleted as the twelfth reference to page B-1:

~~California Coastal Commission, Comment Letter Submitted Regarding the 1996 Fort Ord Dunes State Park Preliminary General Plan and Environmental Impact Report, 1996.~~

## **EIR TEXT REVISIONS RESULTING FROM PUBLIC COMMENT**

### **CHAPTER 2, EXISTING CONDITIONS AND USES**

In response to Comment 11-2, page 2-14, paragraph 1 has been revised as follows:

#### **Regional Faults**

The potentially active portions of the Ord Terrace and Seaside faults are located immediately south of Fort Ord Dunes, while the active Monterey Bay Fault Zone lies immediately offshore. The active San Gregorio Fault-Palo Colorado fault is located approximately 14 miles southwest of Fort Ord Dunes, while the active San Andreas Fault Zone is approximately 20 miles ~~southwest~~ east (see Figure 2-3). Maximum credible earthquakes and historic seismic activity on these faults is summarized on Table 2-2.

In response to Comment 5-1, pages 2-67, paragraph 1 has been revised as follows:

The Preliminary Draft Monterey County General Plan designates the area that includes Fort Ord Dunes as a Public/Quasi-Public zone. This category applies to a variety of existing and proposed uses that are either operated by a public agency or serve the public at large. Public quasi-public uses include parks, recreation areas, and natural reserves. Monterey County is undergoing the Periodic Review for its Local Coastal Program and anticipates that the Coastal Development Permit Authority for Fort Ord Dunes State Park will eventually be transferred to Monterey County's local permitting authority pursuant to its incorporation into the North County Land Use Plan. The North County Land Use Plan may designate Fort Ord Dunes as an Open Space Recreation zone rather than a Public/Quasi-Public zone.

In response to Comment 6-1, the following has been added to page 2-71 as paragraph 2:

**Transportation Agency for Monterey County**

The Transportation Agency for Monterey County is a twenty-three member agency which consists of local officials from each of its twelve incorporated cities and five county supervisorial districts, and ex-officio members from six public agencies, including the Association of Monterey Bay Area Governments, Monterey-Salinas Transit, the Monterey Bay Unified Air Pollution Control District, the California Department of Transportation, the City of Watsonville, and the Monterey Peninsula Airport District. The Transportation Agency for Monterey County is Monterey County’s State designated Regional Transportation Planning Agency, Congestion Management Agency, Local Transportation Commission, and Service Authority for Freeways and Expressways (TAMC, 2004).

As the Regional Transportation Planning Agency, the Transportation Agency for Monterey County is responsible for developing a plan that reflects the needs, concerns, and actions of all the agencies involved in the region and of the public and as such, prepares and updates the Regional Transportation Plan. The purpose of the Regional Transportation Plan is to provide policy guidance, plans, and programs for the next twenty years to attain balanced comprehensive, multimodal transportation solutions, considers all modes of travel, and identifies anticipated funding for projects and programs. The Regional Transportation Plan addresses special factors affecting the transportation system, such as air quality, land use, special transportation needs and multimodal integration (TAMC, 2004).

In response to Comment 6-1, page 2-83, paragraph 2 has been revised as follows:

**Other Relevant Regional Plans and Policies**

Additional regional plans may influence the unit that represent adjoining jurisdictions or geographic areas, such as:

- Monterey County Local Coastal Program, North County Land Use Plan (City of Marina to Pajaro River)
- Programmatic Agreement with the Advisory Council on Historic Preservation

■ ~~Transportation Agency for Monterey County Plans~~

In response to Comment 6-2, page 2-89, paragraph 1 has been revised as follows:

***CIRCULATION***

The existing roadway network that provides access to Fort Ord Dunes is limited; 8th Street is currently the only vehicle access to the dunes. There is also a SR 1 underpass at 1st Street into Fort Ord Dunes that is currently closed by large concrete blocks. Access to the dunes from either 8th Street or 1st Street would require passage through City of Marina and/or City of Seaside streets, contributing to traffic levels on those roadways. Regional vehicular access from SR 1 would be via the SR 1/Lightfighter Drive and the SR 1/12th Street interchanges.

In response to Comment 6-2, page 2-94, paragraph 3 has been revised as follows:

In addition to issues associated with the development of access routes within the park, the methods of accessing the park from nearby cities and freeways needs to be addressed. Currently, the roadway network that provides access to Fort Ord Dunes is limited; 8th Street is the only vehicle access to the dunes. There is also a SR 1 underpass at 1st Street into Fort Ord Dunes that is currently closed by large concrete blocks. Access to the dunes from either 8th Street or 1st Street would require passage through City of Marina and/or City of Seaside streets, contributing to traffic on those roadways. Regional vehicular access from SR 1 would be via the SR 1/Lightfighter Drive and the SR 1/12th Street interchanges. The potential traffic congestion and reductions in levels of service to city streets that may result from park users is a concern for nearby communities.

***CHAPTER 3, THE PLAN***

In response to Comment 10-5, page 3-14, paragraph 6 has been revised as follows:

- BIO-3      Establish a **Western Snowy Plover Management Program** to monitor and protect nesting areas and activities, and to establish appropriate levels of public access to these areas. When determined necessary, implement appropriate supplemental measures, such as erection of exclosures, and predator control, in accordance with the Department's "Western

Snowy Plover Systemwide Management Guidelines,” and as necessary through consultation with regulatory agencies and local experts, including the U.S. Fish and Wildlife Service.

In response to Comment 10-5, page 3-15, paragraph 5 has been revised as follows:

BIO-7 Prepare a long-term **Vegetation Management Plan** that addresses restoring native dune habitats. Coordinate development of the plan with the U.S. Fish and Wildlife Service and other agencies, as appropriate. The Vegetation Management Plan should consider incorporation of science-based management of natural and restored habitat to the maximum extent feasible, and address ecosystem processes. The Vegetation Management Plan should include specific goals and guidelines and could address the following topics, but is not limited to:

- Continuing restoration of natural processes, topography, native dune vegetation restoration, and exotic plant management.
- Re-establishing habitat corridors
- Developing and managing non-native plant species and replacing with native plants; priority given to most invasive and conspicuous species within the park
- Controlling non-native predators, such as feral cats and dogs
- Reintroducing key animal species where feasible
- Creating buffers between habitats and high use areas
- Continuing ongoing biological monitoring
- Educating the public about natural plant and animal communities

In response to Comment 10-6, page 3-17, paragraph 8 has been revised as follows:

BIO-18 Control domestic dogs accompanying visitors to the park in accordance with the terms of California Code of Regulations Title 14, Division 3, Section 4312 (Control of Animals) or as

otherwise permitted by the Department. Section 4312 lists several requirements, including restricting dogs to the limits of campgrounds, picnic areas, parking areas, roads, etc.; restricting dogs from beaches; and requiring leashes.

In response to Comment 6-2, page 3-35, paragraph 2 has been revised as follows:

***Parkwide Circulation***

The general public has not had access to Fort Ord Dunes in the past and the roadway network that provides access to the park is limited. A SR 1 overpass at 8th Street is currently the only vehicle access to Fort Ord Dunes. Access via 8th Street is controlled by a locked gate and access to the underpass at 1st Street into the park is currently blocked large concrete barriers. Access to the park from SR 1 is limited and would occur through streets operated by local jurisdictions. Regional vehicular access from SR 1 would be via the SR 1/Lightfighter Drive and the SR 1/12th Street interchanges. This General Plan has been designed to provide public access to Fort Ord Dunes for the enjoyment of its unique resources.

In response to Comment 9-4, page 3-38, paragraph 5 has been revised as follows:

CIR-16 Allow for development of a north-south connector trail for pedestrian and bicycle use. This connector trail segment is recognized as an important and high priority project by local agencies. Consider ways to separate pedestrian and bicycle uses from vehicular use. When this is infeasible, use traffic management strategies to slow vehicular traffic. Provide bike lanes along roads.

In response to Comment 9-5, page 3-44, paragraph 4 has been revised as follows:

REG-2 Consider existing and future Fort Ord Reuse Authority, Seaside, Marina, Monterey County, Transportation Agency for Monterey County, and other agency plans and proposed land uses within, adjacent to, and near Fort Ord Dunes as related to compatibility and capacity of potential Fort Ord Dunes uses. Planning and development should be carefully coordinated with other agencies to assure that all concerns are addressed, avoiding cumulative impacts to the extent feasible.

## **CHAPTER 4, ENVIRONMENTAL ANALYSIS**

In response to Comment 11-13, page 4-18, paragraph 3 has been revised as follows:

**Mitigation Measure Air-1.** Potential construction air quality impacts should be reviewed at the project-level for specific facilities or management plans proposed under the General Plan and mitigation measures shall be considered, including but not limited to requiring construction contractors to implement a dust abatement program to reduce the contribution of project construction to local respirable particulate matter concentrations. The program may include the following specific measures:

- Water all active construction areas at least twice daily
- Cover all trucks hauling soil, sand, and other loose materials, or require all trucks to maintain at least two feet of freeboard (i.e., the minimum required space between the top of the load and the top of the trailer)
- Pave, apply water two times daily, or apply non-toxic soil stabilizers to all unpaved access roads, parking areas, and construction staging areas
- Sweep daily with water sweepers any paved access roads, parking areas, and staging areas at construction sites
- Sweep streets daily with water sweepers if visible soil material is carried onto adjacent public streets
- Limit the area of construction sites with minimal earthmoving to 8.1 acres per day and the area of construction sites with grading and/or excavation to 2.2 acres per day<sup>1</sup>
- Suspend excavation and grading activity when winds (instantaneous gusts) exceed 25 miles per hour
- Hydroseed with native species or apply (non-toxic) soil stabilizers to inactive construction areas previously graded areas inactive for ten days or more

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<sup>1</sup> These limits are based on Monterey Bay Unified Air Pollution Control District's threshold of 82 pounds/day of direct PM10 emissions in the *CEQA Air Quality Guidelines*, 2002. The limits are intended for screening purposes and do not represent a definitive significance threshold.

- Enclose, cover, water twice daily or apply (non-toxic) soil stabilizers to exposed stockpiles (dirt, sand, etc.)
- Limit traffic speeds on unpaved roads to 15 miles per hour
- Install sandbags or other erosion control measures to prevent silt runoff to public roadways
- Replant vegetation in disturbed areas as quickly as possible
- Where applicable, phase construction projects in such a manner that minimizes the area of surface disturbance (e.g., grading, excavation) and the number of vehicle trips on unpaved surfaces

In response to Comment 10-10, page 4-23, paragraph 4 has been revised as follows:

**Impact Bio-1. Potential Construction Phase Effects to Native Habitats and Species**

Implementation of the proposed General Plan could allow new land uses, new facilities and improvements to existing facilities, and could result in an effect on native habitats and species. Localized, minor, short-term, temporary effects on native vegetation could occur from construction activities (e.g., potential visitor center/kiosk, day-use and/or overnight parking lots, trail development and other new facilities). Effects would be related to heavy equipment and construction activities and could include soil compaction, dust, vegetation removal, wildlife harassment or mortality, root damage, erosion, and introduction and spread of non-native species. Construction effects on native habitats and species may be site-specific short-term and long-term negative effects. The development zones, i.e., 8th Street, 1st Street, and Storage Bunker Zones, could require removal of primarily disturbed plant communities, including disturbed dunes and ice plant dominant communities. Potential removal of these communities within development zones would not negatively affect native habitat; however, the majority of these areas will be developed and would not benefit native habitats and species.

In response to Comment 6-4, page 4-53, paragraph 2 has been revised as follows:

**Mitigation Measure Tra-1.** Potential traffic circulation impacts should be reviewed at the project-level for specific facilities or management plans proposed under the Fort Ord Dunes State Park General Plan, and mitigation measures shall be implemented, including but not limited to:

- Concurrent with the planning and development of project level facilities and management plans, conduct a traffic study for the park's components in consultation with the Department of Transportation, Transportation Agency for Monterey County, and other appropriate jurisdictions. Elements of the traffic study would include, but not be limited to, the following: 1) project trip generation estimate; 2) roadway, intersection and freeway mainline operations and level of service analyses; 3) an onsite circulation and access analysis; and 4) provision of mitigation measures to reduce potential project traffic impacts. Project specific mitigation would be developed based and implemented on the results of these studies.

### ***APPENDIX B, LITERATURE AND SOURCES CONSULTED***

In response to Comment 6-1, the following has been added as the first reference to page B-7:

Transportation Agency for Monterey County (TAMC), website information, accessed 2004. <http://www.tamcmontery.org>



# CHAPTER 4

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## CEQA DOCUMENTS

1. Notice of Preparation
2. Notice of Availability
3. Notice of Completion
4. Notice of Determination

**NOTICE OF PREPARATION**  
**FORT ORD DUNES STATE PARK**  
**GENERAL PLAN**  
**DRAFT ENVIRONMENTAL IMPACT REPORT**

The California Department of Parks and Recreation is preparing a Draft Environmental Impact Report (EIR) for the General Plan for the future Fort Ord Dunes State Park. The Department of Parks and Recreation is the lead agency pursuant to the California Environmental Quality Act and pursuant to Section 15082 (CCR) of the State EIR guidelines and has prepared the Notice of Preparation. Your agency's comments are requested in connection with the scope and content of the environmental information germane to your agency's statutory responsibilities in connection with the proposed project. Your agency may need to use the EIR prepared by our agency when considering your permit or other approval for the project.

The project location, description, possible environmental impacts, and map are attached.

Your response must be sent to the address below not later than thirty (30) days after the receipt of this notice. We would appreciate the name of a contact person in your agency. If you have any questions, please call Jason Spann at (916) 445-8907.

Jason Spann  
Project Coordinator  
Northern Service Center  
California Department of Parks and Recreation  
One Capitol Mall, Suite 500  
Sacramento, CA 95814  
(916) 445-8907

## NOTICE OF PREPARATION

The California Department of Parks and Recreation is the Lead Agency under the requirements of the California Environmental Quality Act and is considering the preparation of a program level (first tier) environmental document for the project identified below.

### PROJECT TITLE:

Fort Ord Dunes State Park General Plan/Draft Environmental Impact Report

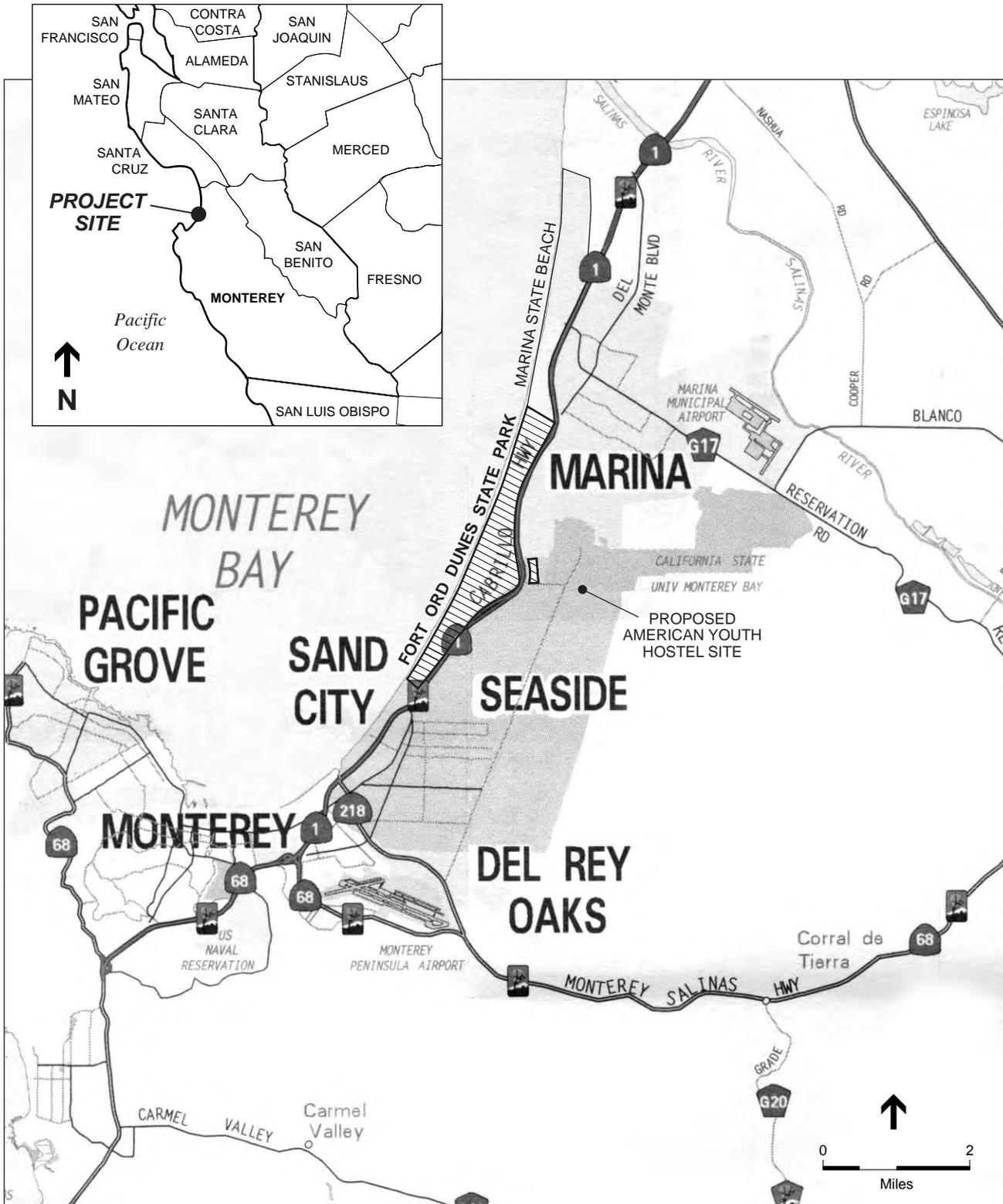
### PROJECT LOCATION:

Fort Ord Dunes consists of approximately 886 acres of proposed parkland located in Monterey County, including 4 miles of ocean beach (see Figures 1 and 2). The property is bordered on the west by the Pacific Ocean, on the south by the City of Sand City, on the east by State Route (SR) 1, and on the north by the City of Marina. Fort Ord Dunes is also located adjacent to Marina State Beach to the north. The property includes 11 acres east of SR 1.

The Fort Ord Dunes property is dominated by a continuous coastal sand dune formation that rises steeply to block ocean views from most of SR 1. The property includes the remnants of fifteen small arms firing ranges, the former Fort Ord ammunition storage area consisting of twelve bunkers, a railroad loading dock, and other military era structures, including Stilwell Hall and a sewage treatment plant (not in use). Stilwell Hall is a 51,822 square foot building completed in 1943 that has served as a Soldier's Club and a Non-Commissioned Officer's Club, in addition to other uses. Fort Ord Dunes also includes an internal road system and utility lines.

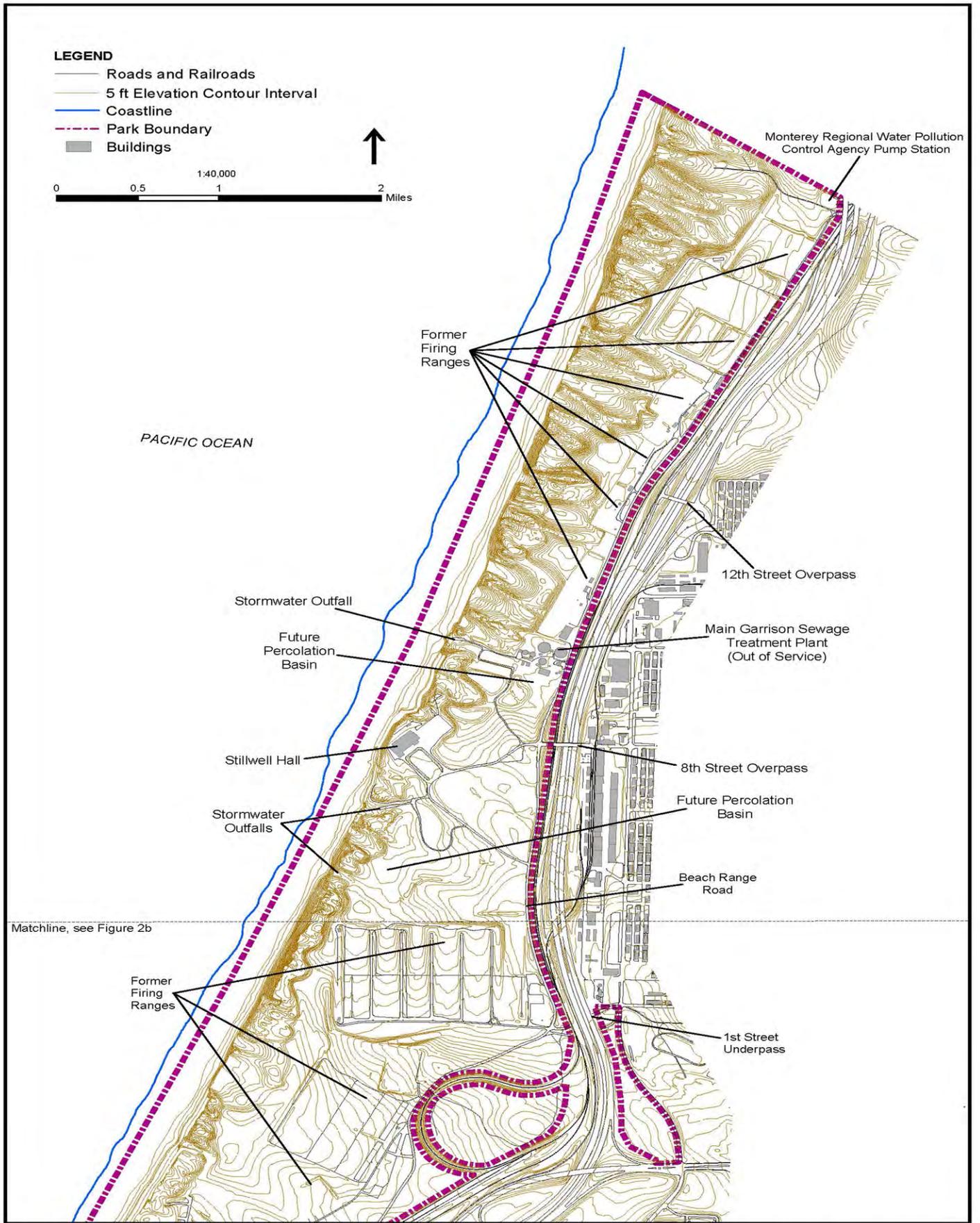
### PROJECT DESCRIPTION:

The general plan will provide a long-term outline and guidelines for future proposed facilities, land use, resource policies, management, operation, interpretation, and concession operations at the future Fort Ord Dunes State Park. Specific development proposals or management plans are not part of the general plan. The general plan/draft environmental impact report is the first tier of environmental analysis. Future implementation of general plan proposals



SOURCE: Rand McNally, Environmental Science Associates

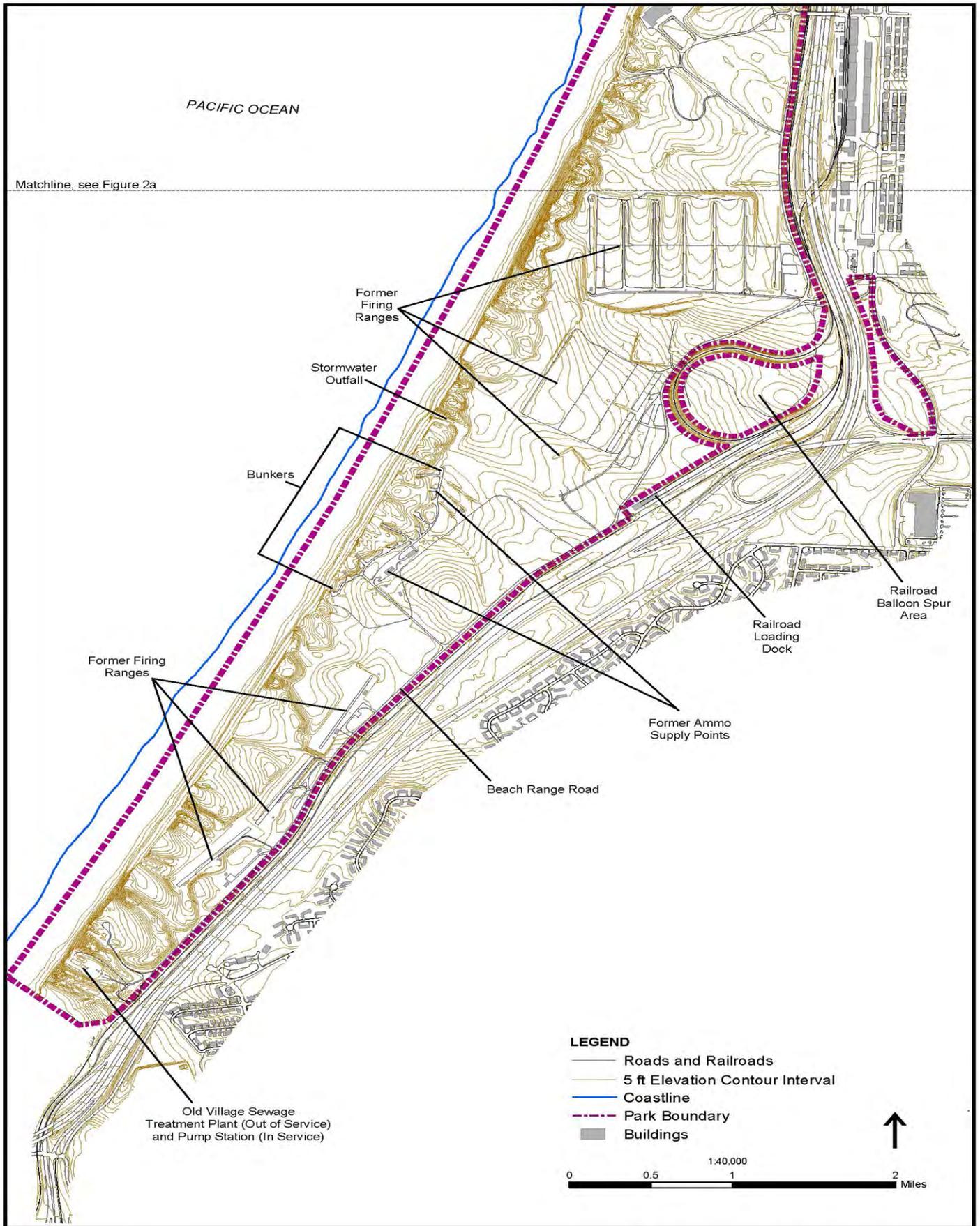
Fort Ord  
**Figure 1**  
 Project Location



SOURCE: USACOE, 1993

Fort Ord Dunes State Park

**Figure 2a**  
Project Site and Existing Facilities



SOURCE: USACOE, 1993

Fort Ord Dunes State Park

**Figure 2b**  
Project Site and Existing Facilities

could occur in phases as funding becomes available, and these proposals will be subject to additional (tiered) environmental review.

The general plan will be based upon the future park's classification, Declaration of Purpose, and Vision, which will provide a context and direction for future park management and site specific planning and development. The plan will consider project alternatives and may recommend further studies for future development projects.

The general plan will develop park-wide goals and guidelines and could also suggest the preparation of management plans covering subjects such as natural resources and sensitive species, cultural resources, park recreation, interpretation, trails, regional influences, and carrying capacity.

The following are some of the primary planning issues anticipated in this process:

This planning effort will focus on defining the framework for resource stewardship, with sustainable public recreation and interpretation, at the future Fort Ord Dunes State Park. The Plan will also bring current resource knowledge to bear on defining the protection, preservation, and management of the future park's unique natural and cultural resources, and protect its special sense of place.

**Regional influences and parks relationship with surrounding areas.**

Opportunities exist for providing beach access, in concert with Marina State Beach to the north, and guidelines for shaping the former Fort Ord military reservation lands to better public benefit. Opportunities also exist for providing a regional trail route.

**Growing demand for recreational opportunities and visitor experiences.**

The State and the Monterey Bay Area region continue to see a growing demand for recreational opportunities. The plan will address opportunities to define the future park's framework for the stewardship of ecological, biological, and cultural resources and their interpretation to the public. In addition, opportunities exist to define the types of facilities, visitor use, and services that will be offered at the future park, while protecting natural and cultural resources.

**Visitor use impacts on resources.** The general plan will evaluate the impacts of potential development and visitor use on sensitive resources, including the dunes and sensitive habitat within.

**Preservation and restoration of sensitive biological resources within Fort Ord Dunes.** Fort Ord Dunes currently includes sensitive wildlife and plant species. Opportunities exist to enhance these habitats, restore populations, and protect these and other less sensitive species, while providing recreational

opportunities for the public. This plan could establish natural preserve areas to better protect significant resources within Fort Ord Dunes.

**Exotic plant species management.** Exotic plant species are negatively affecting the native plants, animals, and habitats of Fort Ord Dunes. Guidelines are needed for long-term management.

**Transportation, circulation, and parking.** Opportunities exist to prevent or lessen future traffic impacts, related to park entrances, circulation, and parking, on intrinsic park values. Road and trail systems could be required to meet management and recreation needs for Fort Ord Dunes.

**Park interpretive and educational resources, programs, and facilities.** Opportunities exist to define the future park's interpretive and educational programs and facilities, particularly related to the natural and cultural resources, and the Fort Ord Dunes military history.

**Employee housing.** Opportunities could exist to provide employee housing.

#### POSSIBLE ENVIRONMENTAL IMPACTS:

If the guidelines and proposals made by the general plan were implemented, there could be potential adverse impacts to soils; water resources and quality; vegetation, wildlife, and habitat; cultural resources; aesthetics resources; and traffic circulation. Potential addition of new facilities and park users could result in environmental impacts related to air quality, noise, and hazards and hazardous materials. If the guidelines and proposals made by the general plan were implemented, there could be potential adverse cumulative impacts.

#### DEPARTMENT OF PARKS AND RECREATION CONTACT PERSON:

Jason Spann  
Project Coordinator  
Northern Service Center  
California Department of Parks and Recreation  
One Capitol Mall, Suite 500  
Sacramento, CA 95814  
(916) 445-8907



## NOTICE OF AVAILABILITY FORT ORD DUNES STATE PARK PRELIMINARY GENERAL PLAN DRAFT ENVIRONMENTAL IMPACT REPORT

**Date:** January 22, 2004

**To:** All Interested Agencies, Organizations, and Persons

A Draft Environmental Impact Report (EIR) has been prepared by the California Department of Parks and Recreation (Department) for the Fort Ord Dunes State Park Preliminary General Plan (General Plan). The Department is the lead agency, pursuant to the California Environmental Quality Act (CEQA), responsible for preparation of this document.

### PROJECT LOCATION

Fort Ord Dunes consists of approximately 990 acres of future parkland located in an unincorporated area of Monterey County. Fort Ord Dunes includes 4 miles of ocean beach and 11 acres east of SR 1. The Fort Ord Dunes property is dominated by a continuous coastal sand dune formation that rises steeply to block ocean views from most of SR 1. The property includes the remnants of fifteen small arms firing ranges, the former Fort Ord ammunition storage area that includes twelve bunkers, and other military era structures that are not in use, including a wastewater treatment plant. Fort Ord Dunes also includes an internal road system and utility lines.

### PROJECT DESCRIPTION

The 990 acre Fort Ord Dunes State Park unit is a new park unit that will provide a unique opportunity to preserve and make available for public use, inspiration, aesthetic enjoyment, and education, an area along the Monterey Bay shoreline of unique natural beauty and scientific significance including sandy beaches, coastal dunes, and remnants of the site's military history.

The Fort Ord Dunes State Park General Plan has been prepared to address management of these lands in a comprehensive manner. The purpose of a California State Park General Plan is to provide the primary management guideline for a park unit by defining a framework for resource stewardship, interpretation, facilities, visitor use, and services. General Plans define the ultimate purpose, vision, and intent for unit management through goal

statements, guidelines, and broad objectives, but stop short of defining specific objectives, methodologies, and designs on how to accomplish these goals.

Five management zones were identified for Fort Ord Dunes: the Natural Resource Zone (approximately 785 acres), the 8th Street Zone (approximately 30 acres), 1st Street Zone (approximately 45 acres), Storage Bunker Zone (approximately 80 acres), and the Administrative/Operations Zone (approximately 25 acres). Desired resource condition, desired visitor experience, and potential uses and facilities were identified for each zone, along with zone specific goals and guidelines. In association with the management zones, potential circulation routes and access points have been identified based on existing resources and uses and facilities described for management zones. Site-specific management zone and circulation and access development will be analyzed, designed, and implemented on a project specific basis.

## SUMMARY OF IMPACTS

The EIR analyzes a program-level analysis of the potential environmental impacts associated with the Preliminary General Plan. No significant environmental impacts would occur as a result of the proposed project.

## PUBLIC COMMENT PERIOD

**The 45-day public comment period for this Draft EIR will commence on January 29, 2004 and concludes on March 14, 2004.** Copies of the Preliminary General Plan and Draft EIR will be available on line at [www.parks.ca.gov](http://www.parks.ca.gov) and at these local locations:

Monterey District Headquarters  
2211 Garden Road  
Monterey, CA 93940

Monterey City Library  
625 Pacific Street  
Monterey, CA 93940

Monterey County Free Library –  
Marina Branch  
266 Reservation Road  
Marina, CA 93933

Monterey County Free Library –  
Seaside Branch  
550 Harcourt Avenue  
Seaside, CA 93955

Please submit comments in writing to the address provided below. Comment letters must be postmarked by March 14, 2004.

Mr. Jason Spann  
Project Coordinator  
California Department of Parks and Recreation  
Northern Service Center  
One Capitol Mall, Suite 500  
Sacramento, CA 95814  
(916) 445-8907

Notice of Completion & Environmental Document Transmittal

SCH # 2003051145

Mail to: State Clearinghouse-Office of Planning & Research, 1400 Tenth Street, Room 222 P.O. Box 3044, Sacramento, California 95812-3044 • 916/445-0613

Project Title: Fort Ord Dunes State Park General Plan

Lead Agency: State of California - The Resources Agency Contact Person: Jason Spann, Project Coordinator Department of Parks and Recreation

Street Address: Northern Service Center, California Department of Parks and Recreation, One Capitol Mall, Suite 500 Phone: (916) 445-8907

City: Sacramento Zip: 95814 County: Sacramento

Project Location:

County: Monterey City/Nearest Community: Cities of Seaside and Marina

Cross Streets: State Route 1 and 12th Street Zip Code: Not Applicable Total Acres: 990 acres

Assessor's Parcel No. Not Applicable Section: Unsectioned Twp. 14S and 15S Range: Range 1E

Base: Mt. Diablo Base and Meridian

Within 2 Miles: State Hwy State Route 1 Waterways: Pacific Ocean Airports: Not Applicable

Railways: Not Applicable Schools: California University Monterey Bay, Golden Gate University, Seaside High School, Marina Del Mar Elementary School

Document Type:

- CEQA: [ ] NOP [ ] Supplement/Subsequent EIR NEPA: [ ] NOI Other: [ ] Joint Document [ ] Early Cons [ ] EA [ ] Final Document [ ] Neg Dec [ ] Other [ ] Draft EIS [ ] Other [ ] Draft EIR [ ] FONSI

Local Action Type:

- [ ] General Plan Update [ ] Specific Plan [ ] Rezone [ ] Annexation [ ] General Plan Amendment [ ] Master Plan [ ] Prezone [ ] Redevelopment [ ] General Plan Element [ ] Planned Unit Development [ ] Use Permit [ ] Coastal Permit [ ] Community Plan [ ] Site Plan [ ] Land Division (Subdivision, etc.) [ ] Other General Plan

Development Type:

- [ ] Residential: Units Acres [ ] Water Facilities: Type MGD [ ] Office: Sq ft Acres Employees [ ] Transportation: Type [ ] Commercial: Sq ft Acres Employees [ ] Mining: Mineral [ ] Industrial: Sq ft Acres Employees [ ] Power: Type Watts [ ] Educational [ ] Waste Treatment: Type [ ] Recreational [ ] Hazardous Waste: Type [ ] Other:

Funding (approx.): Federal \$ State \$ Total \$

Project Issues Discussed in Document:

- [x] Aesthetic/Visual [x] Flood Plain/Flooding [x] Schools/Universities [x] Water Quality [x] Agricultural Land [x] Forest Land/Fire Hazard [x] Septic Systems [x] Water Supply/Groundwater [x] Air Quality [x] Geologic/Seismic [x] Sewer Capacity [x] Wetland/Riparian [x] Archeological/Historical [x] Minerals [x] Soil Erosion/Compaction/Grading [x] Wildlife [x] Coastal Zone [x] Noise [x] Solid Waste [x] Growth Inducing [x] Drainage/Absorption [x] Population/Housing Balance [x] Toxic/Hazardous [x] Landuse [x] Economic/Jobs [x] Public Services/Facilities [x] Traffic/Circulation [x] Cumulative Effects [ ] Fiscal [x] Recreation/Parks [x] Vegetation [ ] Other

Present Land Use/Zoning/General Plan Designation:

979 acres - Public/Quasi-Public (Monterey County); 11 acres - Community Commercial (City of Seaside)

Project Description:

Because there is no applicable General Plan for this unit, the Fort Ord Dunes State Park General Plan has been prepared to address management of these lands in a comprehensive manner. The purpose of the General Plan is to provide the primary management guideline for a unit, by defining a framework for resource stewardship, interpretation, facilities, visitor use, and services. General Plans define an ultimate purpose, vision, and intent for unit management through goal statements, guidelines, and broad objectives, but stop short of defining specific objectives, methodologies, and designs on how to accomplish these goals.

# Reviewing Agencies Checklist

|   |
|---|
| <b>KEY</b><br><b>S</b> = Document sent by lead agency<br><b>X</b> = Document sent by SCH<br><b>/</b> = Suggested distribution |
|---|

**Resources Agency**

- Boating & Waterways
- Coastal Commission
- Coastal Conservancy
- Colorado River Board
- Conservation
- Fish & Game
- Forestry & Fire Protection
- Office of Historic Preservation
- Parks & Recreation
- Reclamation Board
- S.F. Bay Conservation & Development Commission
- Water Resources (DWR)

**Business, Transportation & Housing**

- Aeronautics
- California Highway Patrol
- CALTRANS District # 5
- Department of Transportation Planning (headquarters)
- Housing & Community Development

**Food & Agriculture**

**Health & Welfare**

Health Services \_\_\_\_\_

**State & Consumer Services**

- General Services
- OLA (Schools)

**Environmental Protection Agency**

- Air Resources Board
- California Waste Management Board
- SWRCB: Clean Water Grants
- SWRCB: Delta Unit
- SWRCB: Water Quality
- Regional WQCB #3 \_\_\_\_\_

**Youth & Adult Corrections**

Corrections

**Independent Commissions & Offices**

- Energy Commission
- Native American Heritage Commission
- Public Utilities Commission
- Santa Monica Mountains Conservancy
- State Lands Commission
- Tahoe Regional Planning Agency
- Other \_\_\_\_\_

**Public Review Period** (to be filled in by lead agency)

Starting Date 1/29/04 Ending Date 3/14/04

Signature \_\_\_\_\_ Date \_\_\_\_\_

**Lead Agency** (Complete if applicable):  
 Consulting firm: Environmental Science Associates  
 Address: 225 Bush Street, Suite 1700  
 City/State/Zip: San Francisco, CA 94104  
 Contact: Alisa Moore  
 Phone: (916) 896-5900

**Applicant:** Northern Service Center, Department of  
Parks and Recreation, One Capitol Mall, Suite 500  
 City/State/Zip: Sacramento, CA 95814  
 Phone: (916) 445-8907

**For SCH Use Only:**  
 Date Received at SCH \_\_\_\_\_  
 Date Review Starts \_\_\_\_\_  
 Date to Agencies \_\_\_\_\_  
 Date to SCH \_\_\_\_\_  
**Clearance Date** \_\_\_\_\_  
 Notes:



### NOTICE OF DETERMINATION

**TO:** State Clearinghouse  
Office of Planning and Research  
1400 Tenth Street, Room 222  
P.O. Box 3044  
Sacramento, California 95812-3044

**FROM:** Department of Parks and Recreation  
1416 Ninth Street  
P.O. Box 942896  
Sacramento, California 94296-0001

**SUBJECT:** Filing of the Notice of Determination in compliance with Section 21108 of the Public Resources Code.

**PROJECT TITLE:** Ft. Ord Dunes State Park General Plan

**STATE CLEARINGHOUSE NUMBER:** #2003051145

**CONTACT PERSON:** Ellen Wagner  
One Capitol Mall, Suite 500  
Sacramento, CA 95814

**PHONE NO.:** (916) 445-8929

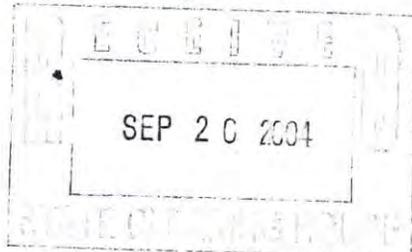
**PROJECT LOCATION:** Ft. Ord Dunes State Park, Monterey County

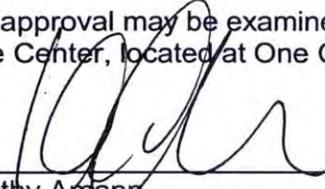
**PROJECT DESCRIPTION:** General plan for the development, operation, management, and interpretation of Ft. Ord Dunes State Park

**The California Department of Parks and Recreation has approved this project on September 17, 2004, and has made the following determinations:**

- 1.  The project will not have a significant effect on the environment.  
 The project will have a significant effect on the environment.
- 2.  A Final Negative Declaration was prepared and adopted, pursuant to the provisions of the California Environmental Quality Act (CEQA).  
 A Final Environmental Impact Report has been completed in compliance with CEQA, and has been presented to the decision-making body of this Department for its independent review and consideration of the information, prior to approval of the project.
- 3. Mitigation measures were were not made conditions of project approval.
- 4. A Statement of Overriding Considerations was was not adopted for this project.
- 5. Findings were were not made on environmental effects of the project.

The EIR or Negative Declaration and record of project approval may be examined at the California Department of Parks and Recreation, Northern Service Center, located at One Capitol Mall, Suite 410, Sacramento, California, 95814.



  
\_\_\_\_\_  
Kathy Amann  
Acting Deputy Director  
Acquisition and Development

SEP 09 2004  
\_\_\_\_\_  
Date