

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/ 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/ March 16, 2004	Hazardous Materials	2
C	Joyce Stevens	Not Applicable	Carmel, California	March 15, 2004/ March 16, 2004	Natural Resources	8
D	Charles Lester, District Director	California Coastal Commission	Santa Cruz, California	March 22, 2004/ March 24, 2004	Coastal Resources	42
E	Nat Roajanasathira, Environmental Senator	California State University Monterey Bay, The Associated Students	Seaside, California	March 30, 2004/ 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/ April 5, 2004	Regional Planning	17

Alan W. Church

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March 14, 2004

RECEIVED

MAR 16 2004

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

NORTHERN SERVICE CENTER

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?

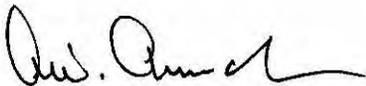
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In closing, most of the activities listed in Section 2, pg 2-91 are in direct conflict with maintaining the wild, natural state that has developed in the area. The creatures and plants that now inhabit the area gravitated to this place because of absence 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.

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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.

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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 8th 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 8th 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 8th 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

SECNIC 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.



Department of Toxic Substances Control

Edwin F. Lowry, Director
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Sacramento, California 95826-3200



Arnold Schwarzenegger
Governor



Terry Tamminen
Agency Secretary
Cal/EPA

March 16, 2004

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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, California 95814

**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.

Specific Comments:

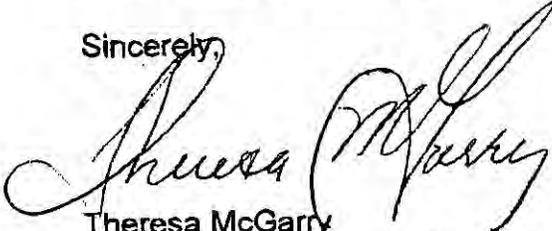
Background and Current Site Condition section; Soil Conditions; page 2-62

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).

Mr. Jason Spann
March 16, 2004
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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
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Ms. Gail Youngblood
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Mr. Jason Spann
March 16, 2004
Page 4

cc: Mr. Grant Himebaugh
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Project Manager
Office of Military Facilities
Department of Toxic Substances Control
8800 Cal Center Drive
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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 ordinance recognition training and reporting.

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

Mr. Jason Spann
Project Coordinator
California Department of Parks and Recreation
Northern Service Center
One Capitol Mall, Suite 500
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14 March 2004

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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 8th 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

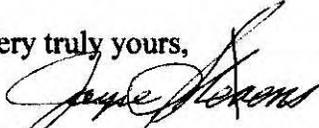
9. Use electric park vehicles.

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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.

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Very truly yours,



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

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**RECEIVED**

MAR 24 2004

NORTHERN SERVICE CENTER

March 20, 2004

Mr. Jason Spann
 Project Coordinator
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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 8th 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 1st Street Management Zone of approximately 45 acres could provide an entrance station, visitor center, vista point, restroom/utilities, 15-20 parking spaces, interpretation

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 8th 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 8th Street beach access route with day use parking and a 1st 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.

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.

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 8th 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.

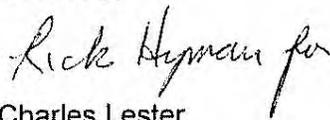
- We recommend that the Department work with the Marina County Water District that in the long term, if feasible, the pump stations in the dunes be relocated to the east side of Highway 1.
- The Department's frontage road which is proposed as a bike/hike through trail parallels and will duplicate the 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 *shall* use water conserving design and equipment, native vegetation *shall* be used in landscaping; water conserving devices *shall* 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 th 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

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| 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 th 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

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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

- 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 (USACOF, 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."

19

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 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. 7

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. 8

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. reseeding, 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

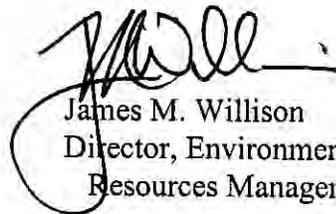
2. Page 4-2. **AREAS OF KNOWN CONTROVERSY**, the sixth bullet item states “Potential human health hazards associated with lead contamination...” The text should reference the Army’s risk assessment (and it’s conclusions) that was prepared for this site.

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 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

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
Geology and Soils	
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).
Biotic Resources	
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 basewide Habitat Management Plan (HMP) and the Draft Habitat Conservation Plan (HCP).	BIO-34 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, <u>including the U.S. Fish and Wildlife Service.</u>
	BIO-5 Review all area- and site-specific planning for consistency with the basewide 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 Vegetation Management Plan 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
<i>Aesthetic Resources</i>	
Identify, preserve, and perpetuate the distinctive landscape qualities of the dunes.	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.
	AES-2 Develop unobtrusive park facilities to enhance and create public opportunities for viewing existing panoramic views from the dunes.
Ensure manmade facilities complement and do not detract from the park's natural setting.	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.
	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.
<i>Recreation</i>	
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.	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.
	REC-2 Develop and operate recreational facilities to enable the public to see, enjoy, and understand the primary resources of the park.

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

Goals	Guidelines
<i>Circulation</i>	
Establish a circulation system that establishes clear traffic patterns, conveys the park image, and minimizes traffic impacts.	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, transportation and circulation goals, guidelines, and traffic levels of service</u> 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.
Balance the need for parking with visitor experience, aesthetics, and protection of park's natural and cultural resources.	CIR-9 Balance parking needs with alternate forms of transportation to accommodate public access to the park and serve park uses and facilities.
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.	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. <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>

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

Goals	Guidelines
<i>Circulation (continued)</i>	
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.
<i>Public Safety and Law Enforcement</i>	
<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 Fire Management Plan 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>
<i>Hazards and Hazardous Materials</i>	
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
<p><i>Regional Planning</i></p> <p>Continue coordination with local land use agencies regarding transfer and/or acquisition of additional nearby property, or other cooperative land management efforts.</p>	<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, <u>Transportation Agency for Monterey County</u>, 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**

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

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>
<u>15122 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>
<u>15123 Summary</u>	<u>The EIR Summary is located on pages 4-1 through 4-8</u>
<u>15124 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>
<u>15125 Environmental Setting</u>	<u>Chapter 2, Existing Conditions and Uses</u>
<u>15126.2 Consideration and Discussion of Environmental Impacts, Consideration and Discussion of Significant Environmental Impacts</u>	<u>Chapter 4, Environmental Analysis</u>
<u>(a) Significant Environmental Effects of the Proposed Action</u>	<u>Significant Environmental Effects and Mitigation, pages 4-9 through 4-57</u>
<u>(b) Significant Environmental Effects Which Cannot be Avoided if the Proposed Project is Implemented</u>	<u>Unavoidable Significant Environmental Effects, page 4-57</u>
<u>(c) 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>
<u>(d) Growth-Inducing Impact of the Proposed Project</u>	<u>Growth-inducing Impacts, page 4-58</u>
<u>15126.4 Consideration and Discussion of Mitigation Measures to Minimize Significant Effects</u>	<u>Significant Environmental Effects and Mitigation, pages 4-9 through 4-57</u>
<u>15126.6 Consideration and Discussion of Alternatives to the Proposed Project</u>	<u>Alternatives to the Proposed Action, pages 4-59 through 4-64</u>
<u>15127 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>
<u>15128 Effects Not Found to Be Significant</u>	<u>Effects Found Not To Be Significant, pages 4-66 through 4-74</u>
<u>15129 Organizations and Persons Consulted</u>	<u>Appendix B, Literature and Sources Consulted and Appendix C, Public and Agency Consultation</u>
<u>15130 Discussion of Cumulative Impacts</u>	<u>Cumulative Impacts, pages 4-64 through 4-66</u>
<u>15131 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.

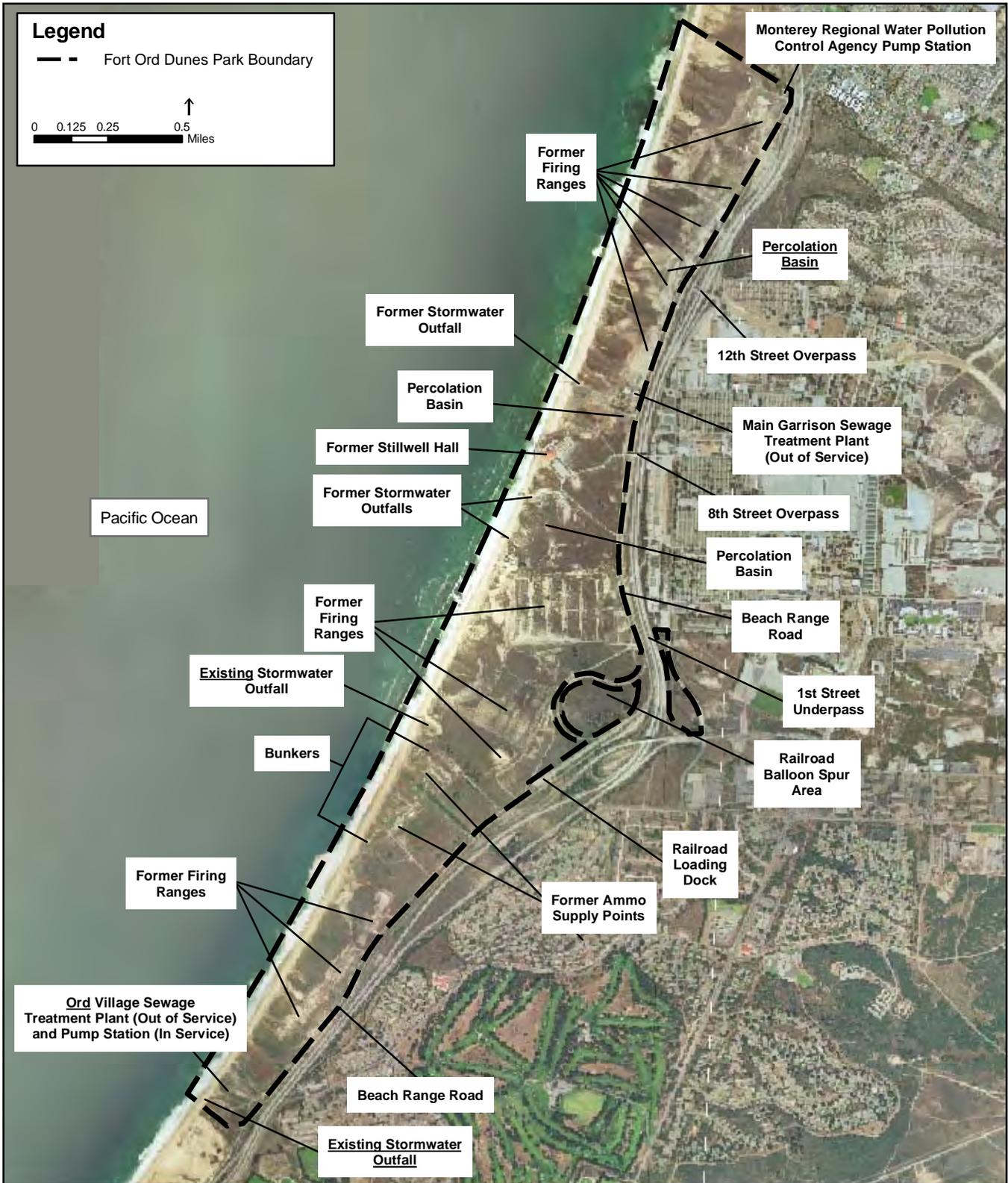


Figure 1-2
Project Site and Existing Facilities

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"> ▪ Entrance station, visitor center/kiosk ▪ 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 ▪ Emergency/operational vehicle routes
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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"> ▪ Entrance station, visitor center/kiosk ▪ 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 ▪ Emergency/operational vehicle routes
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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"> ▪ Camping, day use parking, pedestrian beach access, and interpretation ▪ Emergency/operational vehicle access (i.e., maintenance equipment, park supplies, collections/artifacts, interpretive materials), park operations, adaptive reuse of bunkers for storage (i.e., maintenance equipment, park supplies, collections/artifacts, interpretive materials)
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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"> ▪ 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 ▪ Adaptive reuse of bunkers and existing buildings, restrooms/utilities infrastructure, emergency/operational vehicle routes
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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"> ▪ Administrative facilities, maintenance/operations yard, employee housing ▪ 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) ▪ Emergency/operational vehicle routes
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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 day¹
- 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

¹ 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>