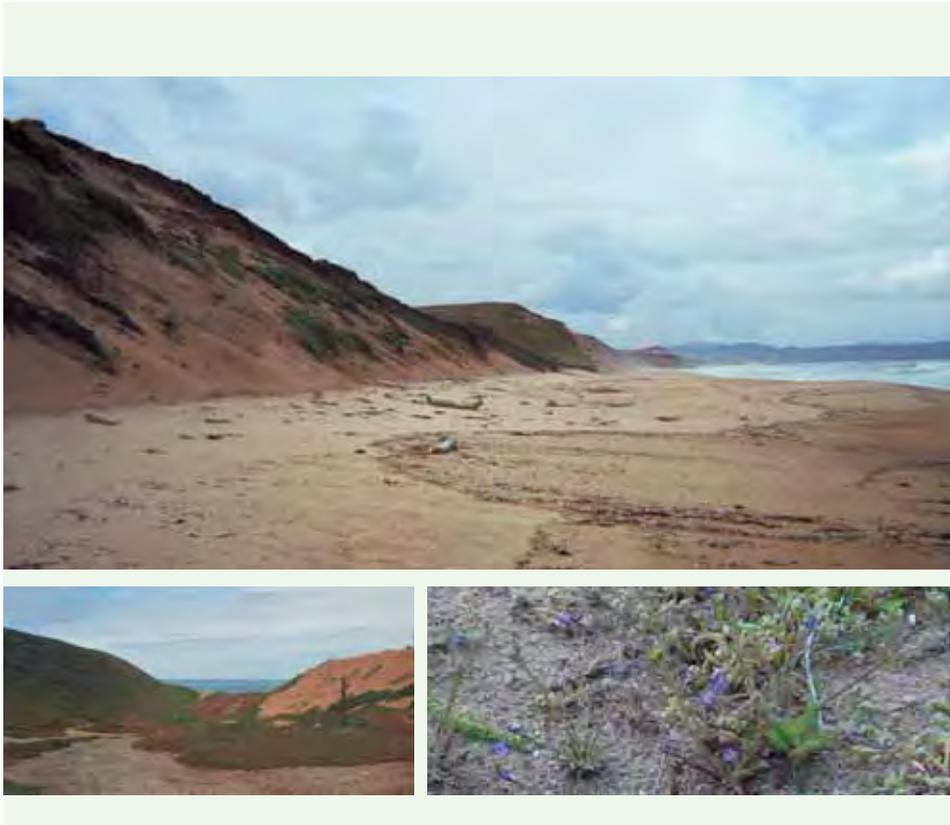


FORT ORD DUNES STATE PARK

Preliminary General Plan and Environmental Impact Report



Responses to Comments

June 2004

Prepared for
State of California - The Resources Agency
DEPARTMENT OF PARKS AND RECREATION

Prepared by



FORT ORD DUNES STATE PARK

Preliminary General Plan and Environmental Impact Report

Responses to Comments

SCH # 2003051145

*Arnold Schwarzenegger
Governor*

*Michael Chrisman
Secretary for Resources*

*Ruth Coleman
Director of Parks and Recreation*

State of California - The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
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CHAPTER 1

INTRODUCTION

PURPOSE OF THE FINAL ENVIRONMENTAL IMPACT REPORT

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

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

The Final EIR shall consist of:

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

ENVIRONMENTAL REVIEW PROCESS

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

CHAPTER 2

COMMENT LETTERS AND RESPONSES TO COMMENTS

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

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

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

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

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

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

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

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

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



MONTEREY BAY

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

AIR POLLUTION CONTROL OFFICER
Douglas Quetin

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

DISTRICT BOARD MEMBERS

CHAIR:
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Santa Cruz
County

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Santa Cruz
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County

Tony Gualtieri
Capitola

Edith Johnsen
Monterey County

Butch Lindley
Monterey County

Arturo Medina
San Juan
Bautista

John Myers
King City

February 3, 2003

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

RECEIVED

FEB 04 2004

NORTHERN SERVICE CENTER

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

Dear Mr. Spann:

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

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

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

Sincerely,

Janet Brennan
Supervising Planner
Planning and Air Monitoring Division

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



Monterey Regional Water Pollution Control Agency

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

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

February 18, 2004

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FEB 22 2004

NORTHERN SERVICE CENTER

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

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

Dear Mr. Spann:

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

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

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

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

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

1
cont.

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

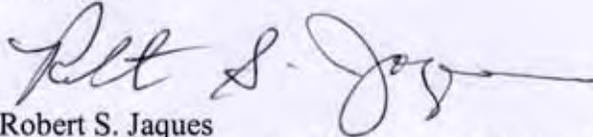
2

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

3

Thank you for the opportunity to provide these comments.

Sincerely,



Robert S. Jaques
Director of Engineering Planning and Technology

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

2 ROBERT S. JAQUES, MONTEREY REGIONAL POLLUTION CONTROL AGENCY

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

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

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

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

February 23, 2004

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

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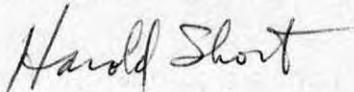
NORTHERN SERVICE CENTER

Dear Jason,

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

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

Best regards,



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

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

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

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

RECEIVED

MAR 02 2004

NORTHERN SERVICE CENTER

February 26, 2004

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

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

Dear Mr. Spann

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

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

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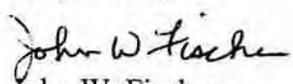
p. 2-88 The last sentence in the first paragraph notes speaks about critical habitats for western snowy plovers. Do I assume, as in my comment above, that this will also be included under Impact Geo-1?

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

3

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

Respectfully,


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

4 JOHN W. FISCHER

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

MONTEREY COUNTY



PLANNING AND BUILDING INSPECTION DEPARTMENT

240 CHURCH STREET, SALINAS, CALIFORNIA 93901 PLANNING: (831) 755-5025 BUILDING: (831) 755-5027 FAX: (831) 755-5487
MAILING ADDRESS: P.O. BOX 1208, SALINAS, CALIFORNIA 93902

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

March 5, 2004

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

MAR 09 2004

NORTHERN SERVICE CENTER

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

Dear Mr. Spann:

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

Future County Jurisdiction

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

Specific Comments

Ch. 2 – Existing Conditions and Issues

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

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

3

Ch. 3 – The Plan

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

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Ch. 4 – Environmental Analysis

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

General Comments

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

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

Sincerely,



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

cc: Jeff Main, Planning and Building Inspection Manager

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

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

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

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

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

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

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

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

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

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

- considered expendable. Guidelines GEO-2 and GEO-3 call for monitoring and documenting geologic processes, including coastal erosion, and undertaking protective measures if necessary. While facilities have not yet been designated for the former Stilwell Hall site, implementation of these guidelines would address potential local and parkwide coastal erosion.
- 5-9 Monterey County requests that a detailed discussion be provided for consistency with the North County Land Use Plan, assuming the park will eventually be incorporated into this Land Use Plan. See the response to Comment 5-1. The General Plan has considered the existing and potential land use patterns of adjacent jurisdictions at a preliminary level, but has not conducted a detailed consistency analysis. However, it is noted that the General Plan calls for review of all area- and site-specific development plans for consistency with resource and land use plans, as appropriate (General Plan Policy REG-3). As noted in response to Comment 6-1, should Fort Ord Dunes be incorporated within the Monterey County's North County Land Use Plan during implementation of the Fort Ord Dunes State Park General Plan, consistency with the North County Plan would be conducted during Coastal Development Permit processing, as appropriate.
- 5-10 Monterey County requests information on park water usage requirements, numbers of visitors, and types of visitor uses. As described on General Plan/EIR page 3-1, the purpose of the General Plan is to describe the desired resource conditions of the new park unit, the goals for recreation facility development, and the desired visitor experiences that will be available in the park, and to provide goals and guidelines that will direct future management efforts toward achieving those desires. The General Plan, by necessity, is visionary in nature, with much of its content driven by current issues. Parkwide and area goals and guidelines are prescribed, which state the management intentions and provide general guidance supportive of the park's natural, cultural, scenic, and recreational resources. To the extent possible, the General Plan establishes ranges for future facilities that indicate potential facilities size, projected uses, and number of users that are considered to be compatible with the desired visitor experiences and the resources that exist within planning areas. Estimations of the maximum number of facilities that could be accommodated within park management zones (see General Plan/EIR Chapter 3) were used for program-level impact analysis, based on resource conditions and physical connections. However, because Fort Ord Dunes has no history of public use, projections of visitors and utilities requirements based on user demands and regional planning, such as roadway infrastructure restrictions, cannot be conducted at this time. The

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

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

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

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

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

DEPARTMENT OF TRANSPORTATION

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6



*Flex your power!
Be energy efficient!*

March 11, 2004

MON-001-83.89
SCH# 2003051145

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

RECEIVED

MAR 11 2004

NORTHERN SERVICE CENTER

SUBJECT: Fort Ord Dunes State Park Draft EIR

Dear Mr. Lee:

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

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

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

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

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

Sincerely,



Mike Galizio

District 5 Development Review Branch

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

6 MIKE GALIZIO, STATE OF CALIFORNIA DEPARTMENT OF TRANSPORTATION

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

Transportation Agency for Monterey County

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

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

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

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

Other Relevant Regional Plans and Policies

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

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

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

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

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

CIRCULATION

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

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

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

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

Parkwide Circulation

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

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

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

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

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

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

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

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

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

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

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

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

MST

MONTEREY-SALINAS TRANSIT

JOINT POWERS AGENCY MEMBERS:

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

March 12, 2004

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

RECEIVED

MAR 15 2004

NORTHERN SERVICE CENTER

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

Dear Mr. Spann:

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

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

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

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

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

Sincerely,

A handwritten signature in black ink, appearing to read "B. Hunter Harvath". The signature is fluid and cursive, with a long, sweeping underline that extends to the right.

B. Hunter Harvath, AICP
Planning Manager

Enclosure

7 B. HUNTER HARVATH, MONTEREY-SALINAS TRANSIT

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



CITY MANAGER

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March 11, 2004

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MAR 15 2004

**NORTHERN SERVICE
CENTER**

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

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

Dear Mr. Spann:

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

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

1

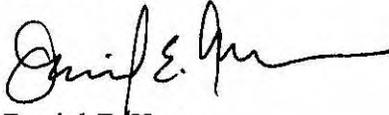
2

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

2
cont.

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

Sincerely,



Daniel E. Keen
City Manager

8 DANIEL E. KEEN, CITY OF SEASIDE

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

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

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



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

March 11, 2004

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

RECEIVED
MAR 15 2004
NORTHERN SERVICE CENTER

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

Dear Mr. Spann:

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

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

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

5
cont.

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

6

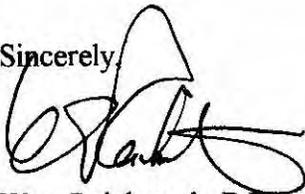
7. TAMC requests that there be no public access inside the balloon spur that is identified as part of the **PSA zone**. All public parking and public access related to that zone should be located on the east side of highway one. The potential train turn around use of the balloon spur is incompatible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

7

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

8

Sincerely,



Wm. Reichmuth, P.E.
Executive Director

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

9 WM. REICHMUTH, TRANSPORTATION AGENCY FOR MONTEREY COUNTY

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

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

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

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

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

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

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

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

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

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



United States Department of the Interior

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



IN REPLY REFER TO:
 PAS 201.398.1659

March 12, 2004

RECEIVED

MAR 15 2004

NORTHERN SERVICE CENTER

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

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

Dear Mr. Spann:

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

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

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

1. We commend your preparation of a plan that promotes the restoration and protection of an important coastal ecosystem. Your plan appears consistent with the 1997 Installation-wide Multispecies Habitat Management Plan for Former Fort Ord (HMP). We note that it does not preserve the distinction, present in the HMP, of the “coastal dune zone” as opposed to the “disturbed habitat zone.” Your plan’s more condensed areas of development are an improvement over the broader regions defined in the HMP. However, you should ensure your plan maintains biological corridors along the length of the Fort Ord Dunes State Park parcel. We note that two of your defined development zones (8th Street Zone and Storage Bunker Zone) extend from the Beach Range Road west to the coastal bluffs. We recommend a corridor of undeveloped, restored, native vegetation be defined and maintained through these areas to provide connections for dispersal and movement of listed and sensitive species between different regions of the Natural Resource Zone. 2
3

2. We recommend that you use the general plan as the basis for revisions to the State Park section of the Fort Ord HCP. For the HCP, you will need more detail than is currently present in the proposed general plan and DEIR. This is particularly important if the construction and use of the visitor-serving facilities proposed in the plan (or some subset of them) are to be included as HCP covered activities. Facilities that will promote increased visitation of the dunes and beaches have the potential to adversely affect the Smith’s blue butterfly, western snowy plover, and listed dune plants, far beyond the footprint of the defined visitor-oriented management zones. We provide a few comments below, to assist with revisions for the HCP. Please also refer to our November 13, 2003, comments on the draft Fort Ord HCP for other recommendations related to revising the HCP section addressing the future Fort Ord Dunes State Park. 4
 - a) BIO-1 and BIO-9 refer to monitoring that will be conducted “...to the extent feasible...” For the HCP, monitoring of covered species should be fully described, and is typically required, for the incidental take permit to remain valid.

 - b) We would like to work with you further to develop the Western Snowy Plover Management Program referred to in BIO-3 and the Vegetation Management Plan referred to in BIO-7. For the western snowy plover, we recommend you identify the most likely nesting areas along the beach (for instance, at the north and south ends of the parcel) and restrict visitor access to those areas from the outset, using signage or symbolic fencing and perhaps including a walking corridor at the surf line. We do not recommend a program which waits until nesting western snowy 5

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

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

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

Sincerely,


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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

RECEIVED

13 March 2004

MAR 15 2004

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

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

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

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

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

Executive Summary – ch. 1

Reg-1, p. ES-7

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

1

Existing Conditions – ch. 2

Regional Faults

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

2

Biotic Resources

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

3

The Plan – ch. 3

HYD-6 on p.3-9

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

4

GEO-3 on p.3-11

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

5

NOI-2 on p. 3-13

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

6

BIO-13 on p.3-17

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

7

Natural Resource Zone

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

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

8

Lead management in 1st St. zone pp. 3-55 to 3-57

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

9

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

9
cont.

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

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

10

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

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

11

Chapter 4 "Environmental Analysis"

Water Resources

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

12

Mitigation Measure Air-1, p. 4-18

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

13

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

13
cont.

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

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

14

Mitigation Measure Hyd-1, p. 4-42

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

15

Alternatives

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

16

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

Other Comments

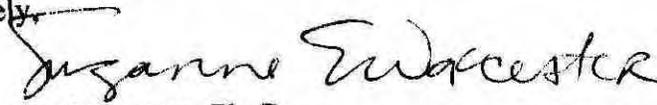
I found no specific discussion of lifeguards, lifeguard stands, swimming safety or ways to deal with ocean hazards. (There was some interpretation on this issue, but I didn't see any discussion of facilities, emergencies on the beach, etc. I apologize if I

17

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

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

Sincerely,



Suzanne E. Worcester, Ph. D.

17
cont.

11 DR. SUZANNE WORCESTER, CALIFORNIA STATE UNIVERSITY MONTEREY BAY

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

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

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

Regional Faults

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

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

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

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

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

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

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

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

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

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

- Limit the area of construction sites with minimal earthmoving to 8.1 acres per day and the area of construction sites with grading and/or excavation to 2.2 acres per day²
- Suspend excavation and grading activity when winds (instantaneous gusts) exceed 25 miles per hour
- Hydroseed with native species or apply (non-toxic) soil stabilizers to inactive construction areas previously graded areas inactive for ten days or more
- Enclose, cover, water twice daily or apply (non-toxic) soil stabilizers to exposed stockpiles (dirt, sand, etc.)
- Limit traffic speeds on unpaved roads to 15 miles per hour
- Install sandbags or other erosion control measures to prevent silt runoff to public roadways
- Replant vegetation in disturbed areas as quickly as possible
- Where applicable, phase construction projects in such a manner that minimizes the area of surface disturbance (e.g., grading, excavation) and the number of vehicle trips on unpaved surfaces

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

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

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

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

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