

MONTEREY COUNTY



Resource Management Agency

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November 16, 2012

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

RE: PUBLIC DRAFT REASSESSMENT REPORT
October 16, 2012

Thank you for the opportunity to comment on the Base Reuse Plan Reassessment Report. We reviewed the subject document and would like to submit a few general comments. While the Reassessment Plan breaks issues down into categories, Monterey County finds that reuse of the former Fort Ord is integrated in many significant ways and reassessment needs to be evaluated globally. It is critical to keep in mind the original purpose of the Base Reuse Plan which was to address the economic impacts (population and businesses) to the cities and the County that resulted from the closure of the Base. With every long range plan, there are economic cycles that affect implementation. The Reuse Plan needs to remain based on the 1990 threshold, not 2007 when the economy changed, in order to address impacts that actually occurred from the Base closure.

All Plans (Specific Plans, Redevelopment Plans, Reuse Plans, etc.) need to be consistent with the adopted General Plans of the local agencies with territory in the former Fort Ord. Monterey County staff has an underlying premise that reassessment is meant to simply assess what has been accomplished under the adopted Reuse Plan, what remains to be accomplished within the limited timeframe of FORA, and finally to prepare for post-reuse. The Reuse Plan should retain a context of providing parameters for getting the former base lands ready for land use within individual jurisdictions (land clearing, title transfers, CIP). Each jurisdiction is charged with addressing specific land use matters as that jurisdiction deems appropriate. Monterey County recognizes that the end of Redevelopment has shifted Monterey County away from seeking development to reacting to development proposals. As such, it now appears more appropriate that the unincorporated lands near Seaside and Marina be viewed as potential urban growth areas for those cities.

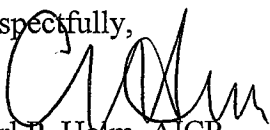
Plans and agreements entered into and being implemented based on the current adopted Reuse Plan must be acknowledged and respected. Not doing so is likely to have significant legal implications. For example, there were various agreements related to Parker Flats that were memorialized in the East Garrison Specific Plan which was adopted by the Monterey County Board of Supervisors and found consistent by the FORA Board. Within these existing agreements, among other things, Monterey County agreed to accept a large amount of open space lands with the expectation to be able to be allowed a certain amount of development. If the reassessment process results in proposing to increase restrictions for what can be developed thereby reducing Monterey County's development potential,

then the County's agreement to accept open space lands must also be reassessed. Also, if the Reuse Plan is revised to restrict development to previously developed sites, then we do not need to complete a Habitat Conservation Plan. Related, the Reassessment Plan would need to include an economic assessment to evaluate financial implications of proposed land use changes, including identification of financial implications to the FORA CIP and to the Reuse Plan as a whole.

There are a number of places where the reassessment plan states that Monterey County has not applied zoning to lands within its jurisdiction. Most of the lands remain designated as "public/quasi-public" as federal lands, except East Garrison where a Specific Plan was adopted. There are two reasons for this: 1) Lands remain under Federal control, County has not received title; and 2) Monterey County was processing a General Plan (GP) Update from 1999 to 2010. It was not technically appropriate to establish new zoning classifications until the GP was adopted or an actual project came forward (e.g. East Garrison). Although the County has now submitted its GP for a consistency determination, FORA determined that further County action is required.

In summary, now is not a time to shift gears relative to the Reuse Plan. There are generally three phases to processing this type of document in Monterey County; planning, environmental review, and litigation. Trying to process a revised Reuse Plan will not likely be accomplished in the limited time remaining for FORA, and it will divert critical resources needed to accomplish what FORA was established to do, which is prepare the former base lands for reuse by the local jurisdictions. FORA's role should be to assist the local agencies to complete the Reuse Plan as it is currently adopted and prepare for the dissolution of FOR A, including cleaning and transferring lands as well as completion of the CIP program. Any consideration of land use or policy changes should be left to the local jurisdictions in which the land is located.

Respectfully,



Carl P. Holm, AICP

Deputy Director

Monterey County Resource Management Agency

cc: Monterey County Board of Supervisors

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