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The Board of Supervisors may also wish to consider amending the FOMP to take into account the designation of the National Monument, as this change in designation clearly impacts land use decisions.

Error in Land Use Description (or Mapping Designations)

Although the FORP maps 3.3-1 and 4.1-7 label the more general East Garrison land parcels as a Planned Development Mixed Use District, the HMP includes parcels within this general area as habitat reserve, specifically Army Parcels E11b.7.2, E11b.7.1.2, and E11b7.1.1. These three parcels are not distinguished as either Open Space/ Recreational or Habitat Management on either the aforementioned FORP maps or LU6a. However, the general language of the FORP addresses Planned Development/ Mixed Use concept as encompassing the juxtaposition of developed areas with habitat areas. The 2002 Assessment report authored by Zander Associates speaks rather clearly to this:

The Base Reuse Plan designated East Garrison as a Planned Development Mixed-Use District. This designation is intended to encourage the development of pedestrian-oriented community centers that support a wide variety of commercial, residential, retail, professional service, cultural and entertainment activities. The Base Reuse Plan concept for East Garrison envisions central core village with adjacent office and commercial uses transitioning (e.g. with equestrian staging areas, trailheads) from developed areas to HMP-designated habitat reserve lands. (my emphasis)

This suggests that either the description of Planned Development/Mixed Use on p. FO-5 of the FOMP should clarify that habitat reserve is a key element in this concept of the associated Planned Development/Mixed Use District designation or that both the FORP maps (map3.3-1 and 4.1-7), as well as the FOMP map (LU6a), should be amended to reveal the habitat reserve designation of habitat parcels.

Misquoted Policy

Recreation/ Open Space Land Use Policy A-1, as stated in the FOMP (p. FO-21), misquotes the policy in the FORP and thereby changes its specificity. In order to be in conformance with the FORP, the policy should read: "The County of Monterey shall *protect* irreplaceable natural resources and open space at former Fort Ord." (my italics to emphasize altered language in the FOMP).

Because the wording in the FOMP – "... encourage the conservation and preservation of..." – is more general and does not convey the same level of responsibility as the FORP language does, it is inconsistent with the FORP.

Policy Omission

The FOMP omits mention of the FORP Recreation/Open Space Land Use Program A-1.2 – Natural Ecosystem Easement Deed Restriction (FORP Volume 4, p. 270). Program A-1.2 states that "The County of Monterey shall cause to be recorded a Natural Ecosystem Easement restriction that will run with the land in perpetuity for *all identified open space lands*." (my italics

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16 September 2013

Dear Monterey County Board of Supervisors:

The Fort Ord Master Plan (FOMP), Chapter 9.E of the 2010 Monterey County General Plan includes a number of significant errors, including mistaken map designations, misaligned land use descriptions, at least one misquoted policy, and the wholesale omission of a program that was described in both the Fort Ord Reuse Plan (FORP) and the FORP Reassessment report. The Sierra Club requests that the Board of Supervisors delay a vote on consistency with the FORP until the errors in the FOMP are corrected. The Sierra Club also requests that the County staff prepare a complete report, with substantiating evidence, regarding all discrepancies between the corrected FOMP and the FORP.

What follows is an identification of the more obvious errors in the publically posted web-version of the FOMP.

Map Concerns

Despite the fact that the text of the FOMP notes that: "...the Land Use Map contained in this plan is the County of Monterey Land Use Plan (Figure 6a) adopted by FORA into the Reuse Plan" (p. FO-4), there are a number of obvious discrepancies between Figure LU6a and FORP County of Monterey Land Use Concept Map 4.1-7/ FORP Land Use Concept Map 3.3-1, including the following:

Although a boot-shaped parcel corresponding to Army Parcel # L.20.2.2 and L.20.2.3.1 is designated Public Facility/Institutional on the FORP Land Use Concept Map 3.3-1 and County of Monterey Land Use Concept Map 4.1-7, the same parcel in Figure LU6a Fort Ord Master Plan-Land Use Plan is labeled Habitat Management and Planned Development Mixed Use.

The square-ish polygon west of Laguna Seca Recreation Area corresponding to Army Parcel # L.20.6 is designated as Open Space/Recreational on 3.3-1 and 4.1-7, but is labeled as Habitat Management in Figure LU6a.

The strip of 7.2 acres that corresponds to Army Parcel # L20.18, acknowledged as Low Density Residential on 3.3-1 and 4.1-7 is represented as roadway in Figure LU6a.

Although the parcel corresponding to Army Parcel # E11b.2 is wholly designated as Development on 3.3-1 and 4.1-7, Figure LU6a labels a significant strip along the west edge as Habitat Management.

These errors render FOMP Figure LU6a inconsistent with FORP maps 3.3-1 and 4.1-7.

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to emphasize the breadth of this mandate). Recreation/Open Space Land Use Program A-1.2 is also clearly identified in the Reassessment report (p. 3-48: as an unfinished program).

Omission of an entire program identified in the FORP and the Reassessment report would clearly be inconsistent with the FORP.

The points above are illustrations of apparent errors in the current version of the FOMP, but they likely do not exhaust the changes that would be required before a vote by the Board of Supervisors would be merited. For instance, the header near the bottom of p. FO-4 reads "Design Principals" when it should read "Design Principles".

The Sierra Club looks forward to further work on the Fort Ord Master Plan so that, as described in the Master Resolution, its substantial conformance with the Fort Ord Reuse Plan is assured.

Sincerely,

Scott Waltz, Ph.D.

Sierra Club, Ventana Chapter

(SW/RD)