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June 4, 2012

Michael Houlemard Jr.
Executive Officer
Fort Ord Reuse Authority
920 2nd Ave., Suite A
Marina, CA 93933

SUBJECT: REASSESSMENT OF FORT ORD REUSE PLAN

Dear Mr. Houlemard:

Please accept the following recommendations regarding issues to be reassessed as LandWatch's formal comments:

1. **Implementation of the Fort Ord Base Reuse Plan**
 - A. Review of all Consistency Determinations made by FORA.
 - B. Review of land use decisions by participating agencies that did not require FORA consistency determinations for consistency with the Plan.
 - C. Status of the Habitat Conservation Plan.
 - D. Status of mitigation measures adopted to address significant and unavoidable environmental impacts of the Plan.
 - E. Status of policies and mitigation measures identified in Attachment I.
 - F. Status of the Capital Improvement Project Program.
 - G. Status of job creation in relationship to goals in the Plan.
 - H. Status of removal of urban blight.
 - I. Status of ordnance removal and groundwater cleanup.
 - J. Identification of water allocation by jurisdiction and project.

2. **Economic Condition**
 - A. Impact of approved and unconstructed residential units on countywide and Monterey Peninsula housing market.
 - B. Impact of approved and unconstructed residential units on property tax revenues and redevelopment funding for Marina, Seaside and Monterey County.
 - C. Impact of the demise of redevelopment agencies on future sources of funding.
 - D. Impact of decline in local government revenue on plan implementation.
 - E. Impact of approved and unconstructed retail, commercial, and industrial projects on local economy.

3. **Population and Employment Forecasts**

- A. While we understand that your economic consultant plans to assess population and employment trends, we strongly recommend that formally adopted forecasts be those adopted by the AMBAG Board of Directors. This will assure that all regional planning efforts for air quality, water supply and transportation are consistent in terms of planning for future conditions.
- B. We also urge FORA staff to participate in development of the AMBAG forecasts.

4. **Role of Staff in Plan Implementation**

- A. Identification of process for responding to public record requests.
- B. Identification of role of staff as advocate for projects that have not been submitted to FORA Board for action.

We appreciate having participated in the meetings with the Sierra Club, LandWatch and FORA staff set up by Assemblymember Monning. These meetings were very helpful in clarifying issues related to FORA. Finally, thank you for your consideration of our formal submission of issues that we recommend be addressed in the reassessment process.

Sincerely,



Amy L. White
Executive Director

Enc. Attachment I

cc: Assemblymember Bill Monning

ATTACHMENT I

Fort Ord Reuse Plan Final EIR – certified June 13, 1997

Water Supply (P. 4-49)

Two regional water management agencies have jurisdiction at former Fort Ord. The Monterey County Water Resources Agency (MCWRA) is responsible for regulation and supply of water from the Salinas Valley, and the Monterey Peninsula Water Management District (MPWMD) is responsible for regulation and supply of water from the Seaside Valley Basin. Through an agreement between the Army and MCWRA, 6,600 acre feet per year (afy) of water is available from the Salinas Valley groundwater basin for former Fort Ord land uses, provided that such provisions do not aggravate or accelerate the existing seawater intrusion. The Seaside Valley groundwater basin supplies an additional 400 afy of water, which is used for the City of Seaside golf course.

(P. 4-53, Section 2. Paragraph 3) By reason of an Army agreement with the Monterey County Water Resources Agency (MCWRA), a potable water supply of 6,600 afy is assumed to be assured from well water until a replacement is made available by the MCWRA (provided that such withdrawals do not accelerate the overdraft and seawater intrusion problems in the Salinas Valley groundwater aquifer). The 6,600 afy of well water could support the first phase of development of the proposed project to the year 2015.

Development to 2015 would result in a water demand of 6,469 afy; this figure accounts for a 10% distribution loss due to leaks and does not include an additional demand of 1,952 afy expected to be supplied by reclaimed water. However, given the existing condition of the groundwater aquifer, there is public concern over the ability of the water wells to “assure” even 6,600 afy.

(P. 4-54, paragraphs one and two) If groundwater wells were unable to supply the projected 2015 demand of 6,600 afy of water for former Fort Ord land uses, e.g., if pumping caused further seawater intrusion into the Salinas Valley aquifer, the desalination plant could be developed earlier than the year 2015. It is recommended that an alternate water supply source, such as on-site storage facilities, be considered.

In order to ensure the water supply issue is resolved and the proposed project does not aggravate or increase the seawater intrusion problem, policies and programs have been developed that would need to be adopted before development of the proposed project could proceed. The following policies and programs for the Cities of Marina and Seaside and Monterey County relate to water supply. [Also refer to the policies and programs related to groundwater recharge in Section 4.5.2].

(P.4-55) Hydrology and Water Quality Policy C-3: The MCWRA and the City/County shall cooperate with MCWRA and MPWMD to mitigate prevent further seawater intrusion based on the Salinas Valley Basin Management Plan, to the extent feasible.

Program C-3.1: The City/County shall continue work with the MCWRA and MPWMD to estimate the current safe yields within the context of the Salinas Valley Basin Management Plan for those portions of the former Fort Ord overlying the Salinas Valley and Seaside groundwater basins, to determine available water supplies.

Program C-3.2: The City/County shall work with the MCWRA and MPWMD appropriate agencies to determine the extent of seawater intrusion into the Salinas Valley and Seaside groundwater basins in the context of the Salinas Valley Basin Management Plan and shall participate in developing and implementing measures to prevent further intrusion.

These programs and policies serve to define the local jurisdictions' involvement in future water supply planning for former Fort Ord, identify potential water supply sources on- and off-site, and affirm the local jurisdictions' commitment to preventing further harm to the local aquifers. They also ensure that water supply remains the primary constraining factor for ultimate buildout of the proposed project, by limiting development in accordance with the availability of secured supplies. However, these programs and policies do not adequately address groundwater recharge; therefore, the following mitigation measures have been recommended for consideration.

Mitigation: Write a program to be adopted by the Cities of Marina and Seaside and the County of Monterey prior to implementing the proposed project that states: the City/County shall adopt and enforce a stormwater detention plan that identifies potential stormwater detention design and implementation measures to be considered in all new development, in order to increase groundwater recharge and thereby reduce potential for further seawater intrusion and augment future water supplies.

Mitigation: A Development and Resource Management Plan (DRMP) to establish programs and monitor development at Fort Ord to assure that it does not exceed resource constraints posed by transportation facilities and water supply shall be established by FORA.

See also the following:

Seawater Intrusion map - 180-foot aquifer:

<http://www.mcwra.co.monterey.ca.us/SVWP/01swi180.pdf>

Seawater Intrusion mpa - 400-foot aquifer:

<http://www.mcwra.co.monterey.ca.us/SVWP/01swi400.pdf>

Conclusion from a 2001 hydrogeologic report on the Marina and Fort Ord area [Final Report: Hydrogeologic Investigation of the Salinas Valley Basin in the Vicinity of Fort Ord and Marina, Salinas Valley, California] .

http://www.mcwra.co.monterey.ca.us/Agency_data/Hydrogeologic%20Reports/Salinas%20Basin%20Ft%20Ord%20Marina/SV_BASIN_FT_ORD_MARIN.HTM

"Seawater intrusion is continuing to migrate inland near the city of Marina and former Fort Ord areas, in addition to along the axis of the Salinas Valley. This intrusion is likely due to the continued production of groundwater from the 180-Foot and 400-Foot Aquifers in this area, despite a substantial transfer of pumping to the Deep Aquifer since the 1980's."

7.0 RECOMMENDATIONS

The following recommendations are made following the evaluation of lithologic, geophysical, ground water elevation, and ground water quality data available in the study area for the 180-Foot and 400-Foot Aquifers:

1. Continue monitoring ground water quality and elevations at the Fort Ord production wells (FO-29, FO-30, and FO-31) and wells to north (14S/2E-33P01 and 14S/2E-28C01). Measurement of elevations have not been possible at the Fort Ord wells for several years and maintenance may be required.
2. Continue monitoring ground water quality at wells 14S/2E-21N01 and 14S/2E-21E01 and collect additional lithologic and groundwater quality data from surrounding wells to determine the most likely path of seawater migration to this area.
3. Include the Beach and Airfield wells in MCWRA's ground water monitoring program and continue to search for early monitoring data collected by the U.S. Army.
4. Collect depth-specific samples for chloride analysis at the dually perforated Airfield well near Marina Airport to determine if elevated concentrations derive from the 180-Foot Aquifer or from the 400-Foot Aquifer.
5. Redefine the Pressure Zone to include the Marina and former Fort Ord area as defined by the extent of the SVA clay and underlying valley fill deposits (including the 180-Foot and 400-Foot Aquifers). This will clarify the potential for hydraulic interaction between the Salinas Valley and city of Marina/Fort Ord area.
6. If monitoring well data must be relied upon in lieu of production well data, the monitoring well should specifically be screened at the bottom of and also the most permeable zone of the subject aquifer to account for the higher density of seawater. Alternatively, depth specific samples should be collected to evaluate the potential for stratification within the monitoring well if possible.
7. Install an exploratory boring near well 14S/2E-28C01 to confirm the thickness of the SVA clay at this location. Knowledge of a 'hole' in the SVA has significant implications concerning potential for agricultural runoff migration to deeper aquifers.
8. Collect and analyze clay samples from the SVA beneath both former Fort Ord and the Salinas Valley to clarify the lithologic relationship between these two clay units. Possible analytical methods include radiocarbon dating, x-ray diffraction, or multi-spectral gamma analysis.
9. Reevaluate the lithologic contacts within the Paso Robles Formation and with underlying formations between 14S/1E-24L and the deep MCWD wells after the USGS report on 14S/2E-24L is available. A more in-depth correlation between these two areas will directly address features of the "Marina trough", if it exists.

10. Digitize geophysical logs available for wells in the study area for future evaluation. Most geophysical logs vary in scale and converting this data to an electronic format would allow for rapid comparison and inclusion into computer models.