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January 17, 2013

David Mack, Associate Planner  
County of Monterey Planning Department  
168 West Alisal, 2nd Floor  
Salinas, CA 93901

**SUBJECT: DEIR FOR FERRINI RANCH**

Dear Mr. Mack:

LandWatch Monterey County submits the following additional comments on the draft environmental impact report (DEIR) for the proposed project.

The DEIR improperly dismisses aesthetic impacts to the "BLM public land" north of Highway 68 as less than significant. DEIR, pp. 3.1-22, 3.1-43. The rationale for this conclusion is as follows:

"Given that BLM locations are used for trail hiking and active outdoor recreation, viewer sensitivity from these public viewing locations is considered high. However, given the physical challenges of accessing the higher BLM trails, with no designated vista point, the BLM trails are not considered by the County to be 'common public viewing areas' as defined by Title 21." DEIR, p. 3.1-43.

The DEIR entirely fails to acknowledge that the "BLM public land" north of Highway 68 is now the Fort Ord National Monument, thereby failing to describe the existing setting accurately.

Furthermore, the DEIR's conclusion that the trails within the Fort Ord National Monument are not a "common public viewing area" within the meaning of Monterey County Code section 21.06.195 is not accurate. That section provides as follows:

"'Common public viewing area' means a public area such as a public street, road, designated vista point, or public park from which the general public ordinarily views the surrounding viewshed." MCC, § 21.06.195; DEIR, p. 3.1-2.

Clearly the Fort Ord National Monument qualifies as a "public park from which the general public ordinarily views the surrounding viewshed." The presidential Proclamation makes clear that enjoyment of scenic resources from its trails is a primary purpose of the Monument:

"Today, this expansive, historic landscape provides opportunities for solitude and adventure to nearly 100,000 visitors each year. By bicycle, horse, and foot visitors can explore the Fort Ord area's scenic and natural resources along trails that wind over lush grasslands, between gnarled oaks, and through scrub-lined canyons. Within the boundaries of the Fort Ord area, visitors admire the landscape and scenery and are exposed to wildlife and a diverse group of rare and endemic plants and animals. Because visitors travel from areas near and far, these lands support a growing travel and tourism sector that is a source of economic opportunity for the community, especially businesses in the region. They also help to attract new residents, retirees, and businesses that will further diversify the local economy." The White House, Office of the Press Secretary, Proclamation, Establishment of the Fort Ord National Monument by the president of the United States of America, April 20, 2012, available at [http://www.blm.gov/ca/st/en/fo/hollister/fort\\_ord/proclamation.html](http://www.blm.gov/ca/st/en/fo/hollister/fort_ord/proclamation.html).

Even if the Fort Ord National Monument trails were not "common public viewing areas," it is clear that the DEIR has not reasonably evaluated view impacts to the Monument. It is improper for the DEIR to adopt a significance criterion that would foreclose the identification of clearly significant impacts. Furthermore, only two viewpoints were evaluated.

The Fort Ord National Monument provides 86 miles of trails for public use. The enclosed trail map demonstrates the views from many of these trails will be significantly adversely affected by the Ferrini Ranch project, including the Guidotti, Skyline, and Oil Well roads and proximate trails.

These trails are already being used daily by many hikers, runners, bicyclists, and equestrians. Designation of the Fort Ord National Monument was intended to, and will, increase the public use of these trails. Indeed, a partnership between Caltrans, the Federal Highway Administration, and BLM is improving the trail access parking along Highway 68 between Torero Drive and San Bernancio Road, including development of the Creekside Terrace Trailhead and the new Badger Hills parking area, directly across Highway 68 from the Ferrini Ranch site.

The DEIR must be revised and recirculated to identify the significant view impacts to the monument.

Thank you for the opportunity to comment on the DEIR.

Sincerely,

A handwritten signature in black ink, appearing to read "Amy L. White". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

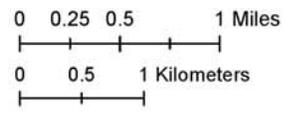
Amy L. White  
Executive Director

# FORT ORD NATIONAL MONUMENT

Trail Map - June 2012



Sensitive Habitat Area  
Please Use Only Signed Trails



--- Single Track Trails	▲ Gates
— Nonmotorized Dirt Roads	Ⓟ Parking
— Nonmotorized Paved Roads	Ⓣ Toilet
— Paved Roads	🏠 MOU Training Center
— Highway	🔥 Fire Station
🟦 Ponds/ Vernal Pools	🏕️ Campground
🟩 Fort Ord National Monument	🏠 Anza Trail
🟨 BLM	
🟪 Army	
🟩 Current/Future Monterey County Park	

