



August 8, 2017

Department of the Army  
Fort Ord Base Realignment and Closure (BRAC) Office  
ATTN: William K. Collins  
BRAC Environmental Coordinator  
P.O. Box 5008  
Monterey, CA 93944-5008

RE: Track 2 Parker Flats Road

Dear Mr. Collins:

LandWatch Monterey County opposes the proposed Record of Decision regarding Parker Flats. While we understand the reason for removing the restriction on residential development on Track 2, there are many reasons that the restriction should remain:

- Development of Parker Flats would support urban sprawl onto valuable oak woodlands.
- Seaside doesn't need the land as identified in background information prepared for its general plan update, and there is undeveloped or blighted land within the existing city limit that should be developed first.
- The public has repeatedly rejected development on former Fort Ord open space, with Whispering Oaks and Monterey Downs/Parker Flats as clear examples. Future projects are likely to be opposed similarly.
- There's a severe water problem on the former Fort Ord, as demonstrated by new seawater intrusion maps of the Salinas Valley Groundwater Basin. New development will only worsen the problem.
- Finally, the County of Monterey swapped residential development on Parker Flats for residential development at East Garrison.

With regard to the "land swap," as reported in the Monterey Herald (August 25, 2012):

According to the East Garrison Specific Plan, the swap was motivated by concerns over loss of oak woodland. It states that the county found Parker Flats unsuitable for a "mixed-use urban village development," partly because of the loss of oaks. Instead, it swapped residential units that had been planned for Parker Flats to East Garrison.

Proposed housing at East Garrison aimed to provide land to meet the County's workforce housing and other needs (especially with housing eliminated from Parker Flats). In exchange for habitat loss at East Garrison, the County agreed to designate 450 acres of habitat reserve at Parker Flats, and the Monterey Peninsula College (MPC) agreed to

locate its law enforcement training center and Emergency Vehicle Operation Center (EVOC) facility at Parker Flats.

It is our understanding the FORA has not amended the Base Reuse Plan (BRP) to remove the residential uses at Parker Flats and Monterey County has not amended its General Plan as required for consistency with the 2010 General with Fort Ord Reuse Plan. As we note in our [Aug. 26, 2013 letter to the Monterey County Board of Supervisors](#):

Although the County and FORA acknowledge that the East Garrison/Parker Flats Land Swap Agreement (“LSA”) somehow changed permissible levels of development in the Parker Flats area, neither FORA’s Fort Ord Reuse Plan nor the County’s Fort Ord Master Plan explain what those changes are.

We understand the Department of the Army does not have jurisdiction over local land use decisions. However, removing restrictions on residential development will facilitate development that is not intended for Parker Flats.

Thank you for your consideration.

Sincerely,

Michael DeLapa  
Executive Director