



July 17, 2015

Bob Schubert, Senior Planner
Monterey County Planning Department
168 West Alisal, 2nd Floor
Salinas, CA 93901

SUBJECT: MND FOR THE TANIMURA AND ANTLE EMPLOYEE HOUSING PROJECT

Dear Mr. Schubert:

LandWatch Monterey County reviewed the Mitigated Negative Declaration for the Tanimura and Antle Employee Housing Project and has the following comments. The proposed project includes 100 units of agricultural employee housing with two bedroom apartments to accommodate 200 to 800 adult agricultural employees for 8 months out of the year:

1. Please explain the need for 79 parking spaces if “The H2A Visa recruits do not come to the U.S. with automobiles, as T&A provides the transportation to and from the county of origin and the facility” (p. 2)
2. The following statement is speculative: “It appears that the treatment facility, with appropriate revisions to the waste water treatment process and to the operating permit, can treat the additional loading from the proposed project” (pp. 3 and 36). The MND additionally states, “T&A is in discussions with the Regional Water Quality Control Board as [to] the adequacy of California American Water’s proposal” (p. 36). Please identify if proposed changes to the system would have significant environmental effects and how the upgrades would be funded. Please also address how the project can move forward based on speculation that Cal-Am can meet project demands.
3. Policy GS-8 in the Greater Salinas Area Plan (GSAP) provides that the property may be developed as agriculturally related commercial uses provided the development meets specific conditions. (P. 13). The 2010 General Plan does not include a definition of “agriculturally related commercial uses”. Please explain how the provision of housing meets the requirements of the 2010 General Plan Agricultural Element and Policy GS-8 of the GSAP particularly in consideration of the following MND finding “Although the project is not considered commercial development, the project is consistent with the

policies.” (p. 15)

4. Project Consistency with the Air Quality Management Plan. (p. 13) The MND does not address requirements for a consistency determination identified by the Monterey Bay Unified Air Pollution Control District (MBUAPCD). See mbuapcd.org/programs-resources/planning/ceqa for the appropriate methodology. This comment also applies to the finding that project emissions are accommodated in the AQMP. (p. 24)
5. The table identifying Mass Daily Thresholds, Construction Thresholds shows 550 lbs/day of CO. This threshold applies only to stationary source emissions, not mobile source emissions.
6. Green House Gas (GHG) emissions should be quantified and compared to thresholds of other air districts. Quantifying CO emissions as identified on p. 29 is not a substitute for addressing GHG emissions.
7. Several mitigation measures to address hazards and hazardous material are proposed (p. 32). Please indicate if the applicant agreed to Mitigation Measures No. 8.1 and 8.4 prior to the issuance of the MND as required by CEQA Guidelines.
8. The MND finds, “At these distances, the noise associated with the site preparation and construction phase may be audible, but their impacts would be less than significant ...These facilities are approximately 1,500 feet from the existing residences in the town of Spreckels and noise is expected to be less than significant.” (P. 39) Please provide noise data to support these findings.
9. The project would conflict with the following provision in CEQA Appendix G, XIII: Population and Housing (a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure). The MND finds, “The project will accommodate agricultural employee housing at the project site, and is not anticipated to induce population growth in the surrounding area, including nearby Town of Spreckels.” (P.40) This CEQA provision refers to substantial population growth in an area and not “in the surrounding area” referenced above. The current population of Spreckels is approximately 880 people (2013 data). The proposed project could almost double the population in the area. This finding requires that an environmental impact report be prepared.
10. The MND finds that agricultural employees would live and work in the areas during a six month period. (p. 40). This conflicts with the project description indicating that employees would reside in the area for eight months from April through November. (Notice of Intent to Adopt a Mitigated Negative Declaration, p. 1). Please explain the discrepancy.
11. Please indicate if Mitigation Measures 14.1 and 14.2 were agreed to by the applicant at the time the MND was issued as required by CEQA Guidelines.

12. The MND finds, “Under existing conditions, seasonal harvest employees (all of whom live off-site) have the option of driving to and parking at the Spreckels site and boarding buses to transport them to the fields or driving directly to the fields in their own cars.” (p. 44. Please address the inconsistency of this finding with the following: “The H2A Visa recruits do not come to the U.S. with automobiles, as T&A provides the transportation to and from the county of origin and the facility” (p. 2) or “Under this scenario, 800 seasonal harvest employees will be bused in from Mexico or Arizona in grounds as needed to meeting harvesting requirements. These employees will not have cars and will be transported to the fields on the existing buses.” (P. 44)
13. Please indicate if Mitigation Measured 16.1 and 17.2 were agreed to by the applicant at the time the MND was issued as required by CEQA Guidelines.
14. Consistency of the project with 2010 General Plan Policies encouraging the location of population centers near services such as shopping, public transit, etc. should be addressed. For example, how would workers get to town on Sundays for services and shopping? If by buses, how many buses would be required? Was bus transportation accounted for in the traffic analysis?
15. In order to address potential public health and safety concerns from pesticide exposure, the buffer around the proposed project should be increased to 200 feet.
16. To mitigate potential traffic impacts from a lack of services in the Town of Spreckels, T&A should consider including a general store on site for the residents of the proposed project.
17. LandWatch notes that 800 people would double the population of Spreckels. Consideration should be given to reduce the total allowable occupancy.
18. The project description should be revised to identify that the site is a brownfield site.

Thank you for the opportunity to comment on the proposed project.

Sincerely,

A handwritten signature in black ink, appearing to read 'Amy L. White', written in a cursive style.

Amy L. White
Executive Director