



**LandWatch**  
monterey county

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March 3, 2011

Craig Spencer  
Associate Planner  
Monterey County Planning Department  
168 West Alisal St., 2<sup>nd</sup> Floor  
Salinas, CA 93901

SUBJECT: FEIR FOR MST WHISPERING OAKS BUSINESS PARK

Dear Mr. Spencer:

LandWatch Monterey County has reviewed the FEIR and has the following comments:

1. In our letter of August 13, 2010 on the DEIR, we noted the project would result in removal of over 4,400 oak trees including 2,400 for the MST project. The FEIR finds removal of the trees would be less than significant based on the following (p. 2-8):
  - (a) Project specific mitigation measures.
  - (b) The Reuse Plan EIR found that build-out of the former Fort Ord would result in less than significant impacts from changes to visual quality because of implementation of visual protection policies in the Fort Ord Reuse Plan and that the proposed project would implement applicable policies. **However, the FEIR fails to identify applicable visual policies from the Reuse Plan.**

Based on the information provided in the FEIR, we believe impacts to visual quality from removal of over 4,400 trees would be an unavoidable and significant impact.

2. In our comment letter, we requested that the visual impact of a 10-foot high wall compared to the existing environment be evaluated. The FEIR states, "The wall is not cited as the reason that the impact is less than significant." (p. 2-8). This response does not address the comment.
3. Regarding mitigation measures for cumulative traffic impacts, we requested that construction schedules for projects to be funded by impact fees be identified along with a determination of whether or not the measures would avoid significant impacts in a timely manner. The FEIR references CEQA Guidelines §15130(a)(3) which authorizes fair share fee payments as a means of reducing a project's cumulative impact to less than significant. While the response is consistent with CEQA Guidelines, the requested information should nevertheless be provided to decision-makers and to the public so that actual mitigation measures - not paper mitigation measures - can be considered.

4. The DEIR found that all phases of the project would emit 35,800 tons per year of Green House Gas (GHG) emissions. Emissions from carbon sequestration were addressed in the FEIR which found the project would emit 2,448 tons of carbon resulting from tree disposal. The project would also increase carbon emissions by 1,071 tons during the first 50 years due to tree removal with mitigation measures reducing emissions by 190 tons. The total estimated emission increases after 50 years would be 1,635 tons (Appendix M). Please indicate if these emission estimates are annual, daily or total emissions. The data should also be compiled in tabular form for ready comprehension.

Thank you for the opportunity to review the document.

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