



LandWatch
monterey county

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Craig Spencer, Assistant Planner
Monterey County Planning Department
168 West Alisal, 2nd Floor
Salinas, CA 93901

SUBJECT: DEIR FOR MST WHISPERING OAKS BUSINESS PARK

Dear Mr. Spencer:

LandWatch Monterey County has reviewed the DEIR for a 58 acre business park subdivision including 24.37 acres for the MST Administrative and Maintenance Facility on Fort Ord. Our comments follow:

1. Aesthetics (p. 2-1). . The site is visible from Imjin Road, intersection of Seventh Avenue and Inter-Garrison Road, Inter-Garrison Road, Frederick Park. The subdivision would result in the removal of over 4,400 oak trees, including 2,400 for the MST project.

The DEIR limits its findings on the project's impacts on aesthetics to the following:

- there would be no significant impact on visual resources from State designated scenic highways.
- there would be a less than significant impact on the visual quality of the Inter-Garrison Road Corridor because the MST site would include a 10-foot tall masonry wall along a portion of the south property line adjacent to the Inter-Garrison Road right-of-way.
- there would be a less than significant impact from glare.

The DEIR fails to address the impact of the subdivision including the MST project on visual quality of the area even though the DEIR finds (p. 2-6) "The natural landscape of the project site contributes to the scenic quality and visual characteristics of this area of the former Fort Ord when viewed from nearby public streets...". This impact should be addressed pursuant to Appendix G, CEQA Guidelines, "(c) Substantially degrade the existing visual character or quality of the site and its surroundings?" Additionally, the DEIR should address the visual impact of a 10-foot high wall compared to the existing environment.

2. Air Quality (p. 2-14).

- A. Reference is made to air quality plans providing for district-wide emission reductions of five percent per year averaged over consecutive three-year periods (p. 2-15). This was a requirement for State ozone planning only and is no longer applicable.
- B. The AQMP includes control measures for both VOC and NO_x emissions, just not VOC emissions as stated (p. 2-18).
- C. The DEIR states MBUAPCD CEQA guidelines do not have thresholds that apply to construction NO_x emissions and that the impact is considered less than significant if reasonable and feasible measure are employed (p. 2-28). District Guidelines should be cited correctly. Section 5.2 states, "Construction projects using typical construction equipment...are accommodated in the emission inventories of State- and federally-required air plans and would not have a significant impact on the attainment and maintenance of ozone AAQS. The District should be consulted regarding emissions from non-typical equipment...".
- D. Table 6. The threshold of significance for PM₁₀ is identified as 82 lbs per day and that the threshold only applies to on-site emissions. The threshold applies to non-mobile sources only. The table should make a distinction between mobile and non-mobile sources if the threshold is to be referenced. Additionally, the table should identify what bus emissions are included in Table 6, i.e., only new bus emissions resulting from the change of locations should be included.
- E. The DEIR references the 2004 MST bus fleet (p. 2-31) indicating that 20% of the fleet is comprised of CNG buses. However, these buses are no longer in service. If the 2004 bus fleet were used to run the URBEMIS model, it should be revised to reflect the bus fleet at the time of buildout.

3. Hazards and Hazardous Waste. The DEIR has extensive discussion of the Salinas Valley Solid Waste Authority (p. 2-81). The document should identify the relevance of this section to the project.

4. Traffic and Circulation.

- A. Increased trips at State Route I interchanges resulting from the MST project as well as the total project are found to be significant and unavoidable even with payment of traffic impact fees. However, the payment of impact fees for road improvements is found to reduce impacts to less than significant at the following intersections: Davis Road/Reservation Road; Fifth Ave-California Avenue/Imjin Parkway; Third Avenue/Imjin Parkway; General Jim Moore Blvd/Broadway Ave., Abrams Drive;Imjin Parkway; Imjin Parkway/Reservation Road and Blanco Road/Reservation Road. The feasibility of implementing these mitigation measures should be addressed. A construction schedule with an estimated time of completion should be provided along with a determination of whether or not the measures would avoid significant impacts in a timely manner.
- B. This comment applies to the traffic cumulative impact analysis as well (p. 3-25). Construction schedules for all proposed mitigation measures to be funded by impact fees should be identified along with a determination of whether or not the measures would avoid significant impacts in a timely manner.

5. Greenhouse Gas Emissions (GHG).

- A. The DEIR finds that all phases of the project would emit 35,800 tons per year of GHG emissions and the impact would be significant and unavoidable even with mitigation. However, the analysis fails to include emission increases related to the loss of over 4,400 oaks trees and other vegetation. Without estimates associated with the loss of this source of sequestration, the analysis is inadequate. Additionally, emissions from tree disposal should be calculated and offset.
- B. Table 23 identifies annual CO₂ emissions based on a “business-as-usual” scenario (p. 3-16). Reference is also made to Table 23 as identifying reduced annual CO₂ emission if all the mitigation measures were implemented (p. 3-21). Table 23 (p. 3-21) should be identified as Table 24 (p. 3-22).

Thank you for the opportunity to review the DEIR.

Sincerely,

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Amy L. White, Executive Director
LandWatch Monterey County

EXHIBIT 1

The attached document describes non-fossil fuel greenhouse gas emissions associated with terrestrial conversions and the scientific/factual basis for analyzing these natural resource GHG emissions under the California Environmental Quality Act.