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November 12, 2013

Elizabeth Caraker  
City of Monterey Planning Office  
Colton Hall, 1<sup>st</sup> Floor  
Monterey, CA 93940

SUBJECT: MND FOR NORTH FREMONT SPECIFIC PLAN

Dear Ms. Caraker:

LandWatch Monterey County reviewed the Mitigated Negative Declaration (MND) for the North Fremont Specific Plan and has the following comments:

1. Project Description: The project consists of the North Fremont Specific Plan and associated zoning map amendments. The specific plan serves as a guide for future development within the planning area. Key components of the plan include land use, development/design standards and guidelines, circulation, parking, and streetscape, infrastructure, and financing and implementation.

The MND states, “The General Plan and General Plan Environmental Impact Report (EIR) assumes a development potential of 130 residential units in the Planning Area. The North Fremont Specific Plan build-out does not assume that a new water source is available for future development with the Planning Area...” (Introduction, p. 2) The MND then states, “The specific plan buildout scenario projects a limited number of new housing units (260), as compared to the potential allowable buildout number based on the General Plan allowed densities (900+). This is due to the lack of available water, requiring a conservative buildout projection for the specific plan. (Initial Study, p. 37) Both the 130 units and 260 units appear to be constrained by lack of water. Please explain the two different residential unit numbers in relationship to water availability.

2. Residential Projects Consistent with Specific Plans: CEQA Guidelines exempt residential projects consistent with a specific plan from future environmental review under specific circumstances (CEQA Guidelines, Sec. 15182). While the Initial Study indicates the specific plan will be updated when water becomes available, it should also identify that the specific plan as proposed is for 130 units, and that water availability allowing for more than 130 units will trigger an update to the specific plan.

3. Air Quality: The MBUAPCD has a different methodology for determining a project's cumulative impact on ozone levels than the method used in the Initial Study (p. 51). The District should be contacted regarding the appropriate methodology.

Thank you for the opportunity to review the environmental 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