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June 3, 2011

Department of the Army
Presidio of Monterey, Directorate of Public Works
Monterey, CA 93940
john.elliott5@us.army.mil

SUBJECT: DEIS FOR PRESIDIO OF MONTEREY REAL PROPERTY MASTER PLAN

Dear Mr. Elliott:

LandWatch Monterey County has reviewed the document which is for a new master plan for the Presidio of Monterey. Installation consists of two locations, the Presidio of Monterey (POM) and the Ord Military Community (OMC). Improvements would include modernizing or replacing aging classrooms and dormitories and improving transportation circulation within the POM. Three Alternatives are evaluated: No Action alternative; the POM-Centric alternative, under which the majority of POM Installation improvements would occur within the POM with only some support facility improvements at the OMC; and the POM and OMC alternative which would involve moving some of the new classrooms and housing facilities planned for the POM to the OMC. The POM-Centric alternative is the preferred alternative. Finally, the EIS addresses both short range and long-range projects. Impacts for projects with assured funding and developed construction design details are addressed at a project level. Impacts for projects that have uncertainty in their timing or funding, or lack construction details are addressed at a programmatic level. Our comments follow:

1. **Climate Change.** While the DEIS includes extensive discussion of Greenhouse Gas Emissions (GHG) and related regulations, it fails to include an analysis of the impacts of the project's GHG emissions on climate change even through the long-range daily CO₂ emissions are estimated to be over 12,000 lbs/day (p. 4-14). The MBUAPCD has prepared draft Thresholds of Significance for GHG emissions of 4.6 tons/year of CO₂ Equivalents per Service Population for land use projects and an Efficiency Metric of 6.6 tons/year of CO₂ Equivalents per Service Population for land use plans. These thresholds are the same as those adopted by the BAAQMD. An analysis of GHG impacts should be included in the FEIS using the draft thresholds.
2. **Air Quality.** The project is found to be consistent with the Air Quality Management Plan (AQMP) based on the finding that it would not exceed population and emission trends forecast in the AQMP (p. 5-4). Table 2-1 (Appendix) shows the project population growing from 9,570 in 2010 to 10,088 in 2013 through 2020, an increase of 518 people. Population forecasts for the City of Monterey show an increase of 172 people between 2010 and 2020 (Table 3.6-3, p. 3-46). Please provide the analysis showing how population consistency was determined.

3. **Water.** The DEIS finds there would be insufficient water available for the POM-centric alternative (Appendix, p. 15). Mitigation measures include water transfers from the OMC to the POM or water from the RUWAP or the Regional Project (CWP). A more complete evaluation of the availability of water for the long-term project should be included in the FEIS. Issues related to water transfers between water basins in relationship to the prohibition against transporting water out of the Salinas Valley Groundwater Basin should be addressed. While the DEIS acknowledges that water from RUWAP or the Regional Project may already have been allocated, a more complete discussion should be included in the FEIS. For example, water from Phase I of the proposed the Regional Project which includes the desalination facility is only for meeting existing water needs and regulatory requirements and not for growth. Also, the Regional Project does not include water for the Monterey Peninsula in the RUWAP, even though 300 AFY were initially provided for that purpose. Finally, because of the State Water Board Cease and Desist Order, any new water supply must go towards meeting water reduction requirements before it can be used for new uses.
4. **Slopes.** Both the FY11 and FY15 barracks would be constructed on steep slopes (>25%). The DEIS states (p. 4-5), “Although building designs would be completed by qualified engineers who would consider slope stabilization needs, the potential for soil erosion from the steep slopes would be potentially significant. Adherence to the NPDES stormwater construction permit and Section 438 of the EISA, combined with the required SWPPP and soil protection BMPs to minimize impacts **could** reduce impact potential to less than significant (emphasis added).” The FEIS should clarify if the proposed mitigation measures **would** reduce impacts to less than significant and identify alternatives locations for the barracks on the POM.
5. **Traffic.** Mitigation measures were identified that would reduce traffic impacts to less than significant. These measures include creation of shuttle bus runs; payment of a fair share to the Del Monte Widening Capital Improvement Project; preparation of a traffic analysis and construction capacity improvements on Del Monte Avenue; implementation of the 126 mitigation projects identified in the 2010 traffic study; and development of a new Highway 68 access control point which would have significant environmental impacts that would be addressed in later documents. The FEIS should identify the feasibility of implementing these measures and the schedule and funding for each measure, e.g., Del Monte Widening Capital Improvement Project.

Thank you for the opportunity to review the DEIS. We look forward to reviewing the final document.

Sincerely,



Amy L. White
Executive Director