



Post Office Box 1876, Salinas, CA 93902

Email: LandWatch@mcldw.org

Website: www.landwatch.org

Telephone: 831-759-2824

FAX: 831-759-2825

August 16, 2011

Elizabeth Caraker, AICP, Principal Planner
City of Monterey
Monterey, CA 93940

Subject: 32 Cannery Row Boatworks Expansion

Dear Ms. Caraker:

LandWatch Monterey County has reviewed the Mitigated Negative Declaration for the proposed project which includes a 75-foot extension of the existing service dock to accommodate guest vessels; a new 50-foot guest dock located to the south of the service dock to accommodate guest vessels; 106-foot extension of the A-dock to accommodate three 70-foot slips, one 60-foot slip, and one 50-foot slip; and, the A-dock extension will also include a 150-foot dedicated guest dock to accommodate guest vessels.

The Initial Study states, "Construction of the proposed project will require the use of diesel-powered equipment, to drill the holes for the dock extension pilings. The equipment use will generate a small amount of fugitive particles and diesel exhaust that could result in an increase in criteria pollutants during construction activities and could also contribute to the existing nonattainment status of the NCCAB for ozone and inhalable particulates." The diesel-equipment oxides of nitrogen (NO_x) emissions or Toxic Air Contaminants (TACs) are not quantified. Depending on the duration of time and type of equipment used, NO_x and TACs could be significant. Emissions should be quantified and compared to the District's thresholds of significance for construction emissions.

The following statement (p. 33) relates to ozone; however, it is included under the discussion of cumulative impacts related to Climate Change:

Projects which are not consistent with the Air Quality Management Plan (AQMP) have not been accommodated in the AQMP and will have a significant cumulative impact on regional air quality unless emissions are totally offset. A project that is inconsistent with the AQMP has not been accommodated in the emissions budget and will have a significant cumulative impact on attainment of the state's ozone ambient air quality standards (AAQS) unless project emissions are totally offset.

The paragraph should either be moved to the air quality section or included in a separate section of cumulative impacts on air quality related to ground level pollution.

Thank you for the opportunity to review the document.

Sincerely,

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

Amy S. White, Executive Director
LandWatch Monterey County