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January 10, 2012

Delinda Robinson  
Senior Planner  
Monterey County Planning Department  
168 West Alisal St., 2<sup>nd</sup> Floor  
Salinas, CA 93901

**SUBJECT: MND FOR POPPY HOLDINGS INC.**

Dear Ms. Robinson:

LandWatch Monterey County has reviewed the document for the Poppy Hills Golf course “refinements” which includes changes to the existing irrigation system and other improvements and removal of 533 trees. We have the following comments:

1. The document should address why the proposed project is being processed separately from the Pebble Beach Company project. Since this project will require removal of 533 trees and generate significant greenhouse gas emissions, the Poppy Hills Golf course changes are best addressed as part of the overall Pebble Beach Company project which would have similar impacts. At a minimum, the cumulative impacts of both projects must be addressed, and the revised environmental documents for both projects should be recirculated.
2. The MND references California Air Resources Board guidelines that recommend separation distance between sensitive receptors and a freeway or high traffic road of 500 feet. P. 26. It also indicates that sensitive receptors in the vicinity of the project include Robert Louis Stevenson School and residential uses located about 300 feet from the project site. The document concludes that with implementation of two mitigation measures to address PM<sub>10</sub> and diesel particulate emissions, impacts will be less than significant. The findings are conclusionary without any supporting evidence. Diesel exhaust modeling should be undertaken to support the document’s finding regarding impacts from toxic air contaminants from diesel exhaust on nearby sensitive receptors.

3. The project would remove 533 trees on 2 to 2.5 acres and replace them with 4 acres with a net gain of about 1.5 acres. The cumulative impact of removal of over 7,000 trees resulting from this project combined with the Pebble Beach Company project should be assessed.
4. The project would generate 4.3 tons/day of CO<sub>2</sub> during the 9 month construction period or 2,227 tons over the life of the project. PP. 23 and 41. In addition, removal of 533 trees would eliminate a source of CO<sub>2</sub> sequestration until the new trees reach maturity.

The document uses the California Air Resources Board threshold of significance of 7,000 million metric tons of CO<sub>2</sub> per year to assess the project's impact. This approach is inconsistent with the approach used in the DEIR for the Pebble Beach Company project. Further, the Poppy Hills project MND identifies only CO<sub>2</sub> emissions while the Pebble Beach Company DEIR identifies CO<sub>2</sub> equivalent emissions (MT CO<sub>2</sub> e).

Using the ARB's criterion, the project is found to have less than a significant impact on climate change. However, the document fails to address the cumulative impact of the two projects proposed for the Del Monte Forest. A consistent methodology should be used to assess the project's impact on climate change for both projects.

Thank you for the opportunity to review the document.

Sincerely,

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

Amy L. White  
Executive Director